



Child Protection and Safeguarding Policy

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Statutory or Best Practice Policy	Statutory
School or Trust Policy	School

We want to ensure that your needs are met.
If you would like this information in any other format, please contact us on
01637 303106 or email info@kernowlearning.co.uk.

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1. Introduction

This policy is issued in line with Keeping Children Safe in Education 2026 which is statutory guidance from the Department for Education issued under Section 157/175 of the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). We have regard to it when carrying out our duties to safeguard and promote the welfare of children in our school.

This policy is available on our school website and at request from our school office. We inform parents and carers about it when their children join our school, and this policy is shared with all staff (including temporary staff and volunteers) at the point of induction and on an annual basis alongside our Staff Code of Conduct.

In addition to this, all staff read and understand the contents of Part One of Keeping children safe in education (KCSiE), with DSL's and DDSL's reading the entirety of its content. [Keeping children safe in education - GOV.UK](#)

We want to ensure that our safeguarding standards can be read and understood by all. If you would like this information in audio type, Braille, large print, any other format or interpreted in a language other than English please inform the Designated Safeguarding Lead in our school.

Links with Other Policies

This policy is linked to our wider safeguarding agenda to ensure safeguarding is fully embedded across our school and community. This includes the following Kernow Learning/school policies:

- a) Whistleblowing
- b) Behaviour
- c) Staff Code of Conduct
- d) Safer Recruitment
- e) Low Level Concerns
- f) Restrictive interventions including the use of reasonable force
- g) Preventing extremism and radicalisation
- h) Young Carers
- i) Children in Care
- j) Attendance
- k) Artificial Intelligence
- l) Supporting pupils with medical conditions
- m) Allergy policy

And National guidance/legislation, including;

[Working together to safeguard children 2026](#)
[Cornwall and the Isles of Scilly Safeguarding Partnership website](#)
[What to do if you are worried a child is being abused](#)
[Working together to improve school attendance - GOV.UK](#)
[Behaviour in Schools - Advice for headteachers and school staff Feb 2024](#)
[Information sharing advice for safeguarding practitioners - GOV.UK](#)
[Convention on the Rights of the Child | OHCHR](#)
[when-to-call-the-police--guidance-for-schools-and-colleges.pdf](#)
[Families First Partnership programme - GOV.UK](#)
[Children's Wellbeing and Schools Bill - Child's rights impact assessment](#)
[Crime and Policing Act 2026 - GOV.UK](#)

We recognise it is not sufficient to have policies in place that are compliant with legislation and so all safeguarding personnel including our DSL, DDSL's, safeguarding governor, trust safeguarding lead and safeguarding trustee regularly review practice to ensure effectiveness.

Whilst we are proud to be part of Kernow Learning Multi-Academy Trust, this safeguarding policy has been individualised to reflect the unique characteristics and contextual setting of our school.

2. Key Safeguarding Contacts

Role in Trust	Name	Contact Details
Trust Safeguarding lead	Lisa Farmer	lfarmer@kernowlearning.co.uk
Trust SEND Lead	Tanya Banks	tbanks@kernowlearning.co.uk
Trust Prevent Lead	Lisa Farmer	lfarmer@kernowlearning.co.uk
Safeguarding Trustee	Derek Rushton	drushton@kernowlearning.co.uk
Trust Whistleblowing Officer	David Houghton	dhoughton@kernowlearning.co.uk
Whistleblowing Trustee	Holly Sykes	hsykes@kernowlearning.co.uk
Headteacher	Alana McGovern	head.foxhole@kernowlearning.co.uk
Designated Safeguarding Lead (DSL)	Alana McGovern	dsl.foxhole@kernowlearning.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Carrie Marshall	foxhole@kernowlearning.co.uk
Prevent Lead	Alana McGovern	head.foxhole@kernowlearning.co.uk
Nominated Governor for Safeguarding	Jo Roberts	jroberts@kernowlearnig.co.uk
Nominated Governor for Attendance	Jo Roberts	jroberts@kernowlearnig.co.uk
Chair of Governors	Jo Roberts	jroberts@kernowlearnig.co.uk
Designated Teacher	Alana McGovern	head.foxhole@kernowlearning.co.uk
Mental Health Lead	Alana McGovern	head.foxhole@kernowlearning.co.uk
SENDco	Katie Truscott	sendco@kernowlearning.co.uk

PSHE / RSHE Lead	Alana McGovern	head.foxhole@kernowlearning.co.uk
Allergy Lead	Alana McGovern	head.foxhole@kernowlearning.co.uk
Filtering and monitoring Lead	Alana McGovern	head.foxhole@kernowlearning.co.uk

3. Purpose and aims

The purpose of our Safeguarding policy is to ensure that we:

- Have a school culture where safeguarding and promoting the welfare of children is **everyone's** responsibility, where the **voice of the child** is always heard and documented. This includes the voice of the child in all its forms, including behaviour.
- **Everyone's** approach is **child-centred**, considering what is in the **best interests** of the child and with a commitment to understanding the child's lived experience.
- **Are committed** to developing a robust safeguarding culture of vigilance and challenge, that exists both within our school and extends out to our families and communities.
- Understand that **no single practitioner** can have the full picture of a child's needs and circumstances, ensuring that sharing of information with others is timely.
- **Build resilience** by raising awareness of safeguarding and child protection issues and equip children with the language and skills to keep themselves safe. This includes teaching children, as part of a robust PSHE programme about bereavement, vaping, understanding their own mental health and where to seek support. (In line with [Relationships and sex education \(RSE\) and health education - GOV.UK](#))
- Support this with online activities, to enable children to enhance their safeguarding skills and knowledge whilst understanding risks associated with the use of artificial intelligence, misinformation, disinformation and deepfakes.
- **Establish a safe environment** in which children can learn and develop within an ethos of openness. Where children are taught to treat each other with respect, to feel safe, have a voice and know they will be listened to.
- **Support vulnerable pupils** who have been or are vulnerable to abuse, neglect or exploitation, or those who have witnessed violence towards others. Ensuring staff understand the complexity of these issues and that exploitation can be linked to abuse within the home.
- **Support children and young people** in accordance with his/her agreed child protection or family help plan, following the procedures set out by the OSCP and take account of all guidance issued by the DfE, Ofsted and other significant bodies.
- Support children and families so they receive the right help at the right time by the right service, and that everyone working in or visiting our school understands they have a role to play in identifying concerns early. This includes identifying families who may benefit from early support or family help, sharing information and taking prompt action.
- **Prevent unsuitable people** from working with children by practicing safer recruitment when checking the suitability of **all** school staff, supply staff, trainee teachers and volunteers and maintain an active, ongoing vigilance in line with our safeguarding culture.

- **Follow robust procedures** where an allegation is made against a member of staff, including those that meet the LADO threshold and those which go against our code of conduct, referred to as low-level concerns. We ensure there are clear records of investigations, appropriate outcomes and a focus on lessons learnt.
- **Risk-assess** any off-site activity, led by our schools.
- **Risk-assess** and carry out due diligence for any parties providing on-site activities on our school site, in and outside of the school day, whether these activities include children from our school or not.
- **Implement procedures** where all staff can identify and report cases of suspected abuse and regularly review them.
- **Keep written, dated and signed records** of concerns about “vulnerable” children, even where there is no need to refer the matter immediately. and to keep records securely.
- **Develop effective links** with other agencies and co-operate as required with their enquiries at all levels of safeguarding including family help (early help and child in need) and child protection.
- **Understand** the role we play in safeguarding, not leaving key agencies including police and social care to deal with safeguarding matters in isolation.
- **Maintain an awareness** of staff knowledge and understanding, embedding safeguarding through clear systems of communication and continuous professional development (CPD).

Our aim is to follow the procedures set out by:

[Cornwall and the Isles of Scilly Safeguarding Partnership website \(ciossafeguarding.org.uk\)](https://www.ciossafeguarding.org.uk)
and [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

At Foxhole learning Academy, we understand that staff within our school are an important part of the wider safeguarding system for our children and strive to:

- Provide help and support to meet the needs of children as soon as problems emerge.
- Protect children from maltreatment, whether that is within or outside of the home, or online.
- Prevent the impairment of children’s mental and physical health or development.
- Ensure that children grow up in circumstances consistent with the provision of safe and effective care.
- Take action to enable ALL children to achieve their best outcomes.

We understand our role in the “collective responsibility to create a safe and nurturing environment for all children, with a particular focus on keeping children within their family home, including through a period of time in kinship care, when it is safe and beneficial” to do so. (Working Together 2026 and the Families First Partnership Programme, updated 2026) We understand that by identifying concerns at the earliest opportunity, providing support to children and families and working collaboratively with other agencies, we are more likely to achieve this.

4. Our school ethos and culture

At Foxhole Learning Academy, children's welfare is of paramount importance, and we are a child centred school. Our children are reassured that they have a voice, will be listened to and what they say will be taken seriously. They know they will be supported and kept safe and will never be given the impression they are creating a problem by reporting a concern.

Children are encouraged to talk freely with staff if they are worried or concerned and our staff understand that a victim of any type of abuse should never feel ashamed for making a report. The child's views and wishes will inform any assessment and/or provision we make for them.

We make every effort to listen to and capture the voice of children, whether this be via the spoken word, sign language, through their behaviour or by any other means. Listening to our children enables us to have a clear understanding of their daily lived experiences and therefore whether they are at risk or need our support.

In our school, we understand that children may not feel able to disclose some concerns, despite the trusted relationships built with staff. We therefore ensure there are alternative pathways for children to report concerns or worries, including "Things I wish my teacher knew" boxes and expression faces. Additionally, we capture pupil voice through pupil leadership roles including school council and the planet protectors' team. Furthermore, we reflect on the responses to our annual Kernow Learning pupil survey.

We are aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated or are being threatened.

This does not prevent staff from having professional curiosity and speaking to the DSL if they have concerns about a child, particularly where their vigilance has led to noticing a change, no matter how small, to a child's presentation or demeanour. Our staff determine how best to build trusted relationships with children to facilitate this communication. We regularly re-visit who the children's trusted adults in school may be with them, both in whole school assemblies, class assemblies and PSHE/RSE lessons and when responding to individual concerns and issues.

We understand our statutory duty to safeguard and promote the welfare of children and maintain a professional attitude of '*it could happen here*' where safeguarding is concerned. Rather than our staff worry about reporting a concern based on "What if I'm wrong?", we foster a culture where we think "What if I'm right?" We expect **ALL** staff, governors, volunteers, and visitors to share our commitment of maintaining a safe environment and culture of vigilance. This applies particularly for concerns we may not come across very often, and where we may only have one opportunity to act, including Female Genital Mutilation (FGM), Forced Marriage, Modern Slavery or Perplexing Presentations and Fabricated and Induced Illness.

Everyone has a responsibility to act without delay to protect children by reporting anything that might suggest a child is being abused, neglected or exploited. It is our willingness to work collaboratively with others and challenge inappropriate behaviours, that underpins this commitment. We work in partnership with families including extended family members where appropriate and other agencies to improve outcomes for children who are vulnerable or in need. Our staff are aware that any child can be a victim or may be vulnerable at any moment within their lives.

Our culture of vigilance ensures staff are confident in the timely challenge of unacceptable behaviours witnessed in our school, that occur online or in the community, particularly in respect of child-on-child abuse. These are dealt with appropriately and robustly, including incidents of bullying, problematic or harmful sexualised behaviour, harassment and violence or the extremely rare occasion when children may bring knives or weapons into our school. Staff do not accept any behaviour which others may refer to as 'banter', 'having a laugh' or 'part of growing up'. Where there are concerns of this nature, we may choose to provide internal support and education or to work closely with partner agencies, including Gweres Kernow.

[Gweres Kernow - Cornwall Council](#)

On occasion, a referral is justified by a single incident, such as an injury or disclosure of abuse. However, concerns can accumulate over time and are evidenced by building a picture of harm,

particularly true in cases of abuse, neglect and exploitation. We are committed to ensuring that our record keeping is of consistently high quality and contains chronologies where we can identify patterns of concern over time. We consider historical concerns in decision making and understand the effects of cumulative harm. Our ability to view safeguarding and behaviour in a single chronology, aids our understanding of a child's daily lived experience and whether outcomes are improving.

When dealing with safeguarding matters, we are conscious of the language and terminology we use, especially in front of children. Sometimes reference is made to a child who has been subjected to abuse or exploitation as a victim. However, not all children will consider themselves a victim nor will they want to be referred to in this way. We are conscious of this and when managing any incident, we are prepared to use terminology that children are most comfortable with.

We will also at times, use the term 'alleged perpetrator' and where appropriate 'perpetrator' and we know that these are widely used terms. However, we know that abusive, harmful or problematic behaviour is likely to be harmful to the perpetrator as well as the victim and could be a result of trauma or harm they have experienced. In this vein, we are mindful of appropriate language and decide terminology on a case-by-case basis. We understand that the role of perpetrator and victim can sometimes be interchangeable and our DSL's are aware of the term the "Alpha Victim" [Crossing the Line: Rethinking the 'Alpha Victim' - Vulnerability & Policing Futures Research Centre](#)

We work closely and restoratively with our safeguarding partners but have the confidence and knowledge to challenge decisions and practice. When challenge is necessary to improve outcomes for children, we remain professional, and child focussed. We do not cease challenge until we believe a child has been adequately safeguarded and protected and at times this may include raising a concern to the safeguarding board or requesting a learning/rapid review.

At Foxhole Learning Academy, we are committed to working with parents in a positive, open and transparent way. We ensure all parents are treated with respect, dignity and courtesy and that our school is a welcoming space where parents and wider members of the community feel able to share concerns.

We recognise the stressful and traumatic nature of safeguarding and child protection work, and support staff by signposting them to our "Support for Schools" advisory service when needed and without judgement. Staff are encouraged to speak to our DSL when they have dealt with difficult and challenging situations, and the Trust Safeguarding Lead is available for supervision with our DSL/DDSL's. The impact on individuals of dealing with safeguarding daily is both understood and supported.

5. Equality

At Foxhole Learning Academy, we have clear obligations under the Equality Act 2010. We do not unlawfully discriminate against children or staff because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). All the above protections are important in the context of safeguarding, and we take seriously our duty to consider how we support these individuals.

Under the Equality Act, our school can take proportionate positive action to address disadvantages for children with certain protected characteristics so we can meet their needs. We can for example, consider taking action to support girls if there is evidence they are being disproportionately subjected to sexual violence or harassment, including online. Proportionate action can also be taken when deciding how we teach some elements of sport. We will always make reasonable adjustments for disabled children.

All staff at Foxhole Learning Academy, are aware of their duties under the Equality Act 2010, and this forms an integral part of Level Two safeguarding training. Staff actively identify and challenge racism in our school and recognise cultural nuances and how these may lead to differences in how children act or families work with us. (Working Together 2026)

Our DSL's and DDSL's ensure culturally competent practice in multi-agency decision-making and meetings and will challenge the decision making of others if it appears to be based in discrimination.

Our DSL and DDSL's understand the Supreme Court ruling on the definition of sex (2025) and how this forms practice within our school environment. In line with this guidance, we do not allow children into toilets designated for the opposite biological sex. This includes where we are responding to a request to support any degree of social transition for children who are questioning their gender. We provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time). This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014 and reflects our safeguarding obligations.

The same principle applies to any school residential trip, where children of one biological sex will never share accommodation overnight with a child of the opposite sex. Where we make any special arrangements for children, for example use of a separate disabled toilet or separate accommodation at their request, this will be recorded in the child's safeguarding file.

Some children have an increased risk of abuse, and additional barriers can exist with respect to some children recognising or disclosing it, which may be based on a protective characteristic. We ensure that all children have the same protection, regardless of barriers they may face. Assurances are given to all, but we give special consideration to children who:

- Have special educational needs (SEN), disabilities or health needs
- Are young carers
- May experience discrimination due to their race, ethnicity, religion or sex
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
- Are at risk of FGM, exploitation, forced marriage, radicalisation and/or modern slavery.
- Are asylum seekers
- Are at risk due to either their own or a family member's poor mental health
- Are looked after or previously looked after
- Have a social worker or have previously had a social worker
- Are living in kinship care

We are committed to ensuring all children, irrespective of sex, age, disability, race, religion or belief, sexual identity or social status, are protected from abuse and exploitation. We seek to:

- Ensure all children feel listened to and valued.

- Create a safe and welcoming environment where children can develop their skills and confidence.
- Support and encourage other groups and organisations to implement similar policies.
- Ensure all staff receive training that includes a focus on anti-discriminatory practice.
- Ensure training or events are managed to the highest possible safety standards.
- Demonstrate anti-discriminatory and anti-oppressive practice throughout our school and with our parents, carers and all those we work with.
- Recognise the additional needs of children from minority ethnic groups and disabled children and the barriers they may face.
- Work closely with the local authority, ensuring all concerns relating to intolerance are reported to them and where appropriate to the police and MASSH (multi-agency support and safeguarding hub)
- Carefully recruit and select all employees, contractors and volunteers.

[Equality-act-2010-advice-for-schools](#)
[Equality and human rights guidance](#)

6. The role of all staff in keeping children safe

All staff know who the DSL/DDSL is in our school and understand that as well as being the expert in this field, they are there to support staff, volunteers and the governing body.

All staff have read and have a good understanding of **part 1** of [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#) 2026 and are aware of its link to other policies within our school and across our Trust.

All staff receive Level One and Level Two safeguarding training in addition to focussed training on Prevent, Keeping Children Safe in Education (updates), low-level concerns, searching screening and confiscation, restrictive interventions and kinship care.

All staff receive **online safety training** which incorporates emerging digital risks including **artificial intelligence** and how AI relates to the **four C's of online risk** (Content, Contact, Conduct, and Commerce). This includes deepfakes, chatbot grooming, and AI-generated image sharing. Staff also know what action to take with regards to misinformation, disinformation (including fake news) and conspiracy theories.

All staff understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring. [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#). Filtering and monitoring training takes place at the point of induction and updated on an annual basis. Training is specific to the systems used within our school, so staff understand the role they play in raising awareness and being vigilant and alert to weaknesses in the system.

All staff receive safeguarding and child protection (including online safety) updates regularly and at least annually, to ensure they have the relevant skills and knowledge to safeguard children effectively every day. Here at Foxhole Learning Academy, we use a range of innovative ways of embedding staff knowledge, including quizzes, 7-minute briefings and scenarios. The DSL considers which 7-minute briefing should be prioritised in response to current concerns or issues in the school and local community – both here in Foxhole and beyond.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse online as well as face to face. They know that in many cases abuse and other risks will take place concurrently both online and offline. Staff are aware that children can abuse other children online; this can take the form of abusive, harassing, and/or misogynistic/misandrist messages, the sharing of self-generated intimate images and/or videos, especially around chat groups, and the sharing of abusive images and

pornography, to those who do not want to receive such content. Staff are aware of the role of Artificial Intelligence in these issues.

All staff are aware of the indicators of abuse, neglect, exploitation and modern slavery, understanding that children can be at risk of harm at home, inside our school, online and in our communities. Staff are aware that these issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

All staff understand that extra familial harms take a variety of forms and children can be vulnerable to multiple harms at one time including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation. Weekly communication is shared with staff with updates. Safeguarding patterns, issues or incidents that have occurred are prioritised in this communication with a 'need to know' approach taken to the information sharing so that all staff are empowered to remain vigilant, ask questions of the DSL should they need to and be best placed to respond to a safeguarding concern in school or the local community.

All staff are aware that contextual safeguarding concerns including online harms can be linked to misogyny and culture. However, they know these concerns are preventable with timely, evidence-based support and understand the important role they play in the early identification of concerns.

All staff are aware that abuse includes the impact on children who have witnessed any form of domestic abuse, including where they see, hear or experience its effects. (The Domestic Abuse Act 2021) [Domestic Abuse Act 2021: overarching factsheet - GOV.UK](#) They share concerns of this nature with the DSL without delay and understand the right of the child to be recognised as a victim, allowing us to provide any support necessary, often in collaboration with external agencies.

All staff know we are proud members of Operation Encompass and help us to respond quickly and appropriately to any information shared by police. [Home : Operation Encompass](#)

All staff are aware of the mandatory reporting duties under the Crime and Policing Act 2026 [Crime and Policing Act 2026 - GOV.UK](#) and report any known or suspected case of child sexual abuse. They understand it is also a crime to prevent someone else from reporting. All staff know they will be supported by the DSL to fulfil this duty.

All teachers are aware of their mandatory reporting duties under the Serious Crime Act 2015 [Serious Crime Act 2015 - GOV.UK](#) to report all known or suspected cases of FGM to police and to the MASSH

All staff understand the role they play in identifying young carers at the earliest opportunity so support can be provided to them and their family.

All staff know what to do if a child tells them they are being abused, exploited, or neglected and are confident to deal with disclosures. Staff know how to maintain an appropriate level of confidentiality by only involving those who need to be, such as the DSL/DDSL and local authority children's social care. Staff never promise a child they will not tell anyone about a report of abuse, understanding that ultimately this will not be in the best interests of the child.

All staff are aware of the early support and family help process in Cornwall and understand their role in it. They are confident to identify and support children and families who may benefit. All staff are aware they hold privileged positions in our school to identify concerns early, provide help for children and families, promote children's welfare and prevent concerns from escalating.

All staff are aware of their responsibility to provide a safe environment in which children can learn. This includes effectively managing behaviour at all times of the school day and ensuring children only leave classrooms during lessons in exceptional circumstances.

All staff are aware of the potential link between safeguarding, attendance and behaviour and ensure that registers are taken timely at the start of our school day and immediately after lunch.

All staff know that if something doesn't feel right about a child and/or family and they have a "niggle", no matter how small, they can speak to the DSL without fear or judgement. They understand that this gut instinct may allow us to identify concerns early and help change or save a child's life.

All staff are aware of how to make a referral to children's social care, especially for any child whose health and/or development is likely to be impeded without effective support (section 17 child in need) and for any child suffering, or likely to suffer, significant harm (section 47, child protection) along with their potential role in any subsequent assessments.

All staff understand the importance of good quality record keeping. They record incidents without delay, and on the day of the incident and will speak to the DSL first if to wait for the completion of a record could stand in the way of urgent action being taken.

All staff understand their responsibility to report concerns about the behaviour of any adult in our school and know they will be listened to and taken seriously. This is the case for both concerns that meet the harm threshold and those deemed to be "low level".

All staff understand their responsibility to escalate concerns and 'press for reconsideration' both inside the school via the safeguarding team and externally to other agencies if they believe a child's needs remain unmet. The safeguarding team here at Foxhole Learning Academy operate an open-door policy to all staff and encourage anyone to challenge actions if, following the sharing of a concern, a child is still failing to thrive and/or in need or if the child has been harmed or is at continuing risk of harm.

In all cases, if staff are unsure, they know to speak to the DSL/DDSL or Trust Safeguarding Lead.

7. Roles and responsibilities of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead(s)(DDSL)

The Designated Safeguarding Lead (DSL) in our school holds lead responsibility for child protection, early intervention, and multi-agency coordination. They are a senior member of our school leadership team, ensuring safeguarding policies work in practice, managing sensitive child protection files, and advising staff. The DSL in our school is Mrs Alana McGovern

Our DSL/DDSL(s) have received appropriate training to provide them with an understanding of their role and the knowledge and skills to carry out their duties. The DSL and deputies are trained to the same level (Level 3) to allow for strong internal strategic challenge and discussion. The training they receive supports their knowledge of the processes, procedures, and responsibilities of other agencies, particularly children's social care in line with [Working together to safeguard children 2026: statutory guidance \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/616226/Working_together_to_safeguard_children_2026_statutory_guidance.pdf)

Level 3 training for our DSL and DDSL's is updated on a two-yearly basis and regularly refreshed. Training includes a multi-agency focus through the local authority as well as trust specific training.

Our DSL is given the necessary time, funding, training, resources, and support to carry out their role effectively and they attend regular DSL Network Briefings.

The DSL (or a nominated deputy) is always available to staff during school hours to discuss safeguarding concerns. While availability in person is expected in most cases, in exceptional

circumstances availability may be via phone or other digital media. Robust cover arrangements are put in place for periods of DSL absence, such as illness or leave, which often includes a shared confidential mailbox.

The role of the DSL encompasses several core responsibilities, and they act as the primary point of contact for all staff reporting any safeguarding concern.

The DSL ensures **all** staff, volunteers and regular visitors have appropriate safeguarding training to equip them for their role in our school. This includes training on how to recognise indicators of concern, how to respond to a disclosure and how to record and report this information accurately. The DSL ensures systems are in place to induct new staff/governors and that they are robust and monitored. The DSL ensures that safeguarding is a standing agenda item in all staff meetings and responds to any weaknesses or gaps in knowledge they identify.

The DSL maintains our school training matrix to record and monitor the safeguarding training of **all** staff and governors. This includes statutory training, including Levels One, Two and Three, Online and Prevent training as well as additional ways in which knowledge is refreshed.

The DSL monitors the school's emerging contextual concerns and training is focussed in these areas as appropriate.

The DSL, DDSL's, attendance lead and SENDCo hold weekly case management discussion meetings (with attendance by at least 2 individuals) to ensure the crossover between safeguarding, attendance and behaviour is constantly considered. This reflective practice ensures everything has been done to protect a child, so they are able to achieve their best outcomes. These meetings are documented, with clear actions and considerations recorded in the child's safeguarding file.

The DSL/DDSL ensures all staff receive training on the quality of record keeping and monitors these records through auditing case files. The DSL ensures that all concerns are recorded on the day they occur and that all records include:

- a clear and comprehensive summary of the concern including the child's voice where possible
- a detailed description of any action taken

And by the DSL/DDSL:

- The rationale for decision making and/or information sharing, including reference to historical concerns where appropriate
- Evidence of reflective practice and discussions held in case management discussion meetings
- Comments on any lessons learnt from a child's experience that can improve outcomes moving forward.

The DSL/DDSL makes appropriate, timely referrals to local authority children's social care and/or police and ensures their effective coordination with family help services. The DSL liaises with all staff (e.g. pastoral staff, school nurses, attendance staff, SEN staff and Mental Health Leads) on matters of safety and safeguarding and when deciding whether to make a referral.

The DSL/DDSL refers cases of suspected abuse, neglect and/or exploitation to the local authority children's social care without delay and as required, will support other staff to make these referrals.

The DSL ensures strategy discussions, when needed, are arranged by children's social care and/or police within at least 48 hours. For cases where there is an immediate risk of harm, they ensure these are coordinated on the same day and if necessary, within 2 hours.

The DSL ensures all strategy discussions involving child sexual abuse or exploitation are attended by the SARC (Sexual assault referral centre). If other agencies have omitted to invite them, the DSL will do so without delay.

The DSL/DDSL represents our school at child protection conferences and core group meetings and is the expert within our school.

The DSL/DDSL will notify children's social care without delay if a child with a child protection plan is absent from school.

The DSL ensures data protection is never a barrier to safeguarding and shares information without delay to progress the safeguarding and protection of any child.

The DSL/DDSL ensure safeguarding files are only accessed by those who need to see them and where the file or content within is shared, this happens in line with information sharing procedures. The rationale for sharing information with others is always recorded.

The DSL ensures there are clear recording processes to document the transfer of files to other settings and here at Foxhole Learning Academy we use a transfer of records form which is signed by the sending and receiving settings. A copy of this form is retained by us for a minimum of 12 months. The transfer of records is completed only when the child has attended the receiving school and records are sent within 5 working days.

In specific circumstances, where a child requires support due to experiencing abuse and/or exploitation, where a risk assessment needs to be put into place prior to the child arriving and/or there are concerns regarding behaviour and attendance, the DSL may make the decision to share information early. Where this decision is made, the justification is clearly recorded. This practice is in line with Cornwall's agreed protocols and any setting who fails to transfer records within 15 school days, is referred to Ofsted.

Our DSL ensures that information shared with other settings only includes content pertaining to the child whose record it is. Where they know that an associated or linked pupil also attends the setting, they may decide to include this information. The DSL ensures that no identifiable information for a child who does not attend the setting to which records are being sent is included in any transfer. Data breaches are reported by the DSL to Lisa Farmer, the trust safeguarding lead, and David Houghton, COO within 48 hours.

When a parent chooses to remove their child/ren from our school to receive EHE (Elective Home Education), the DSL will pass any safeguarding concerns and the safeguarding file, if there is one, to the EHE Team within Cornwall County Council. They inform other professionals, including family support workers and social workers who are involved with the child. If the DSL has safeguarding concerns, they share them in a timely manner with Cornwall's multi-agency support and safeguarding hub (MASSH) in addition to ensuring the inclusion on the EHE form.

The same process applies for those children who are defined as Children Missing in education, where the child's records are sent to the CME team if another school has not been named or isn't known within 20 school days and where that team has taken responsibility for the child. We are aware of the criteria set out in the Children's Schools and Wellbeing Bill, 2026 regarding local authority responsibilities to ensure children do not become lost within the system. We are committed to the part we play in ensuring this does not happen to children who leave our school by following all procedures in a timely manner and sharing concerns without delay. [Children's Wellbeing and Schools Bill - Child's rights impact assessment](#)

The DSL reports any serious safeguarding incidents to the trust safeguarding lead without delay. This includes cases of serious sexual violence, weapons brought into school, serious cases of exploitation that need to be known and disseminated across the trust, the death of any child or staff member, any allegation against a member of staff regardless of level and any use or proposed use of resolving professional differences at manager level or above. This list is not exhaustive and if in doubt, the DSL/DDSL will share information without delay. (A more comprehensive list can be found in the Kernow Learning internal document DSL/DDSL Job description)

The DSL works closely with ICT4 to understand the school's filtering and monitoring systems, ensuring they block harmful online content. They oversee the school's response to modern risks, including artificial intelligence (AI), deepfakes, misogynistic influencers, and online radicalisation. The DSL ensures all Senso alerts are responded to without delay and keep a

record of these in the child's safeguarding file.

Guidance:

[Filtering and monitoring standards for schools and colleges](#)

As part of online safety in our school, the DSL takes lead responsibility for information security and access management, ensuring we have the appropriate level of security protection measures in place. The DSL reviews the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies and oversees any relevant actions.

This strengthens resilience, reduces the risk of disruption, prevents data breaches, and mitigates against safeguarding risks

Guidance:

[Cyber security standards for schools and colleges](#)
[Cyber Security Training for School staff](#)

The DSL ensures our children are educated on topics including misinformation, disinformation (including fake news) and conspiracy theories.

The DSL ensures our school is a mobile phone-free environment where pupils do not have access to their mobile phone throughout the school day including during lessons, time between lessons, breaktimes and lunchtime. The only exceptions to this are pupils whose medical needs require them to have a mobile phone on their person. When this is the case, this is documented in a child's healthcare plan/safeguarding file and is known by all staff within our school.

The DSL reviews and updates the school's child protection and safeguarding policy annually.

The DSL ensures safer recruitment processes within our school are effective by working collaboratively with office staff and overseeing the completion of the Single central record. Audits of the SCR are documented with clear actions which are completed timely. While the DSL can delegate responsibility for completion of the SCR, they understand it is their responsibility to ensure safer recruitment processes are robust and the SCR compliant.

The DSL/DDSL helps to promote the educational outcomes of looked after children (LAC), previously looked after children (PLAC), children with a social worker, children who have previously had a social worker and children in kinship care by sharing appropriate information about the welfare, safeguarding and child protection issues that children are experiencing, or have experienced. Their role includes ensuring that all staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspiration for this cohort. They support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that could be made to best support these children. The Designated Teacher in our school is Mrs Alana McGovern and they discuss the progress and safety of these children regularly within case management discussions and with the Virtual School for Cornwall (Awena). [Awena | Cornwall Virtual School - Cornwall Council](#)

The DSL/DDSL and dedicated teacher understand the important role that the Virtual School has in working with us to improve the attendance of all pupils who fall under their remit, extended in June 2021. Recognising attendance as a key factor in safeguarding, we work closely with the Virtual School Heads and local authority to set and report on ambitious targets to improve attendance.

The DSL is aware of the importance of teaching about healthy relationships and health as part of a comprehensive and effective PSHE offer. They ensure all teachers have knowledge about the one-stop hub for teachers which can be accessed here: [Teaching about relationships, sex and health - GOV.UK \(www.gov.uk\)](#) The scheme we use at Foxhole Learning Academy to support

delivery of a full and effective PSHE curriculum is 'SCARF'. This scheme is underpinned by Safety, Caring, Achievement, Resilience, Friendship.

The DSL is aware of the importance of learning from Child Safeguarding Practice Reviews/learning reviews regardless of whether our school has been directly involved or not. They ensure, in collaboration with the Trust Safeguarding Lead that key points of learning are disseminated and understood by staff in a timely manner.

The designated safeguarding lead and any deputies liaise with the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) and work effectively with any other agency in line with Working Together to Safeguard Children 2026. In all respects we understand the important role that we play in working with key agencies to keep children safe and protected from harm and to this end we ensure we are engaged, involved and included in any safeguarding arrangements, acting as the presumptive 4th partner.

The DSL has a good understanding of the community in which our school sits and serves, the risks and its resilience. The school shares all school events in local community social media groups including bingo nights and Christmas and Summer Fayres. We liaise with other local clay schools, particularly our local feeder secondary schools in relation to specific and contextual issues around safeguarding. They understand that by engaging with our wider communities, we can create robust safeguarding cultures that extend outside of our school environment.

8. Our Governing Body

At Foxhole Learning Academy we have a confident and knowledgeable Governing Body who have strategic leadership responsibility for safeguarding arrangements. They ensure we have regard to up-to-date legislative guidance and ensure policies, procedures and training are effective and comply with the law. [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education)

Our school has a named safeguarding and attendance governor, and their details can be found at the top of this policy and on our school website.

The Headteacher ensures that policies and procedures, adopted by the governing body and Trustees (particularly those concerning referrals of suspected abuse, neglect and exploitation), are understood, and followed by all staff. These policies are transparent, clear, and easy to understand by all.

Regular training equips our governing body and trustees with the knowledge to provide strategic challenge to test and assure themselves that safeguarding policies and procedures are effective. This supports the delivery of our robust whole school approach. Their assurance is gained amongst other things through termly audits completed by the safeguarding governor and strong strategic challenge and assurance following headteacher reports, where safeguarding trends and priorities are discussed.

The Governing body ensures our school has appointed a Designated Safeguarding Lead (DSL) who takes lead responsibility for safeguarding and child protection, including online safety.

They ensure the DSL understands their responsibility in leading safeguarding across our school and help facilitate conversations around any additional time, funding, training, resources, and support needed to carry out their role effectively. [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education)

Our Governing Body ensures we have identified a Deputy Designated Safeguarding Lead(s)(DDSL), who is/are trained to the same safeguarding standard as the DSL.

The Governing Body ensure that all staff, including governors, receive appropriate

safeguarding and child protection training (including online) at induction. They gain assurance that this training is regularly updated and in line with advice from our safeguarding partners.

The Governing body ensure we have a whole school approach and that safeguarding involves all staff and visitors and remains at the forefront of everyone's mind, underpinning all relevant aspects of process and policy development. They ensure our systems, processes and policies operate with the interests of children at its heart.

The safeguarding governor speaks to children during termly visits to ensure they feel safe, providing pupils with an opportunity to raise concerns regarding our school site or practice and/or risks online or in our community. This helps to provide assurance that safeguarding procedures are effective in practice and not just assumed to be so by our senior leadership team.

During their visit to our school, the governors observe our school environment and raise any concerns in respect of any staff member not managing the behaviour of children effectively both in and outside of the classroom. They understand their responsibility to ensure our school is a safe educational environment, where children can learn without fear or interruption.

In considering their responsibility to safeguard children and provide them with a safe environment in which to learn, our Governing Body ensure that our school has the appropriate filtering and monitoring systems in place. They ensure our leadership team and relevant staff have an awareness and understanding of these provisions, manage them effectively and know how to escalate concerns when identified.

The Governing body discuss with the DSL whether conversations they have had with I.T staff and service providers mean that anything additional needs to occur to support our school in meeting a set of standards. This includes:

- identifying and assigning roles and responsibilities to manage filtering and monitoring systems;
- reviewing filtering and monitoring provisions at least annually;
- blocking harmful and inappropriate content without unreasonably impacting teaching and learning;
- having effective monitoring strategies in place that meet our safeguarding needs.

If the governing body becomes aware of any concerns, they bring these to the attention of our DSL and/or Trust Safeguarding Lead.

Guidance:

[Filtering and monitoring standards for schools and colleges](#)

The Governing Body are aware of their responsibility under cyber security legislation and guidance to ensure the appropriate level of security and protection is in place to safeguard our systems, staff and learners. They understand the need to review the effectiveness of these procedures on at least an annual basis to keep up with evolving cyber-crime technologies. They ensure, through their oversight, that staff within our school know how to deal with misinformation, disinformation (including fake news) and conspiracy theories and that children are taught about these things as part of our robust PSHE curriculum.

Resources

- [Teaching about relationships, sex and health](#)
- [Harmful online challenges and online hoaxes](#)

In this vein, they work within the following guidance:

Guidance:

[Cyber security standards for schools and colleges](#)
[Cyber Security Training for School staff](#)

The Governing body are aware of their obligations under the [Human Rights Act 1998](#), the [Equality Act 2010](#), (including the [Technical Guidance on the Public Sector Equality Duty](#)), and local multi-agency safeguarding arrangements. Further guidance is found in [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#) & [Equality Act 2010-Advice for schools](#)

The Governing Body ensures compliance with the completion of our Section 157 Safeguarding audit return to the Local Authority, where any areas of concern in safeguarding are identified. They oversee our school safeguarding action plan, which is a working document, containing clear actions, completed in a timely manner to improve safeguarding practices. While our governors are aware that our school completes trust safeguarding and governor audits, they understand that these compliment and do not replace the statutory return to the local safeguarding partnership.

The Governing Body ensure that our school contributes to inter-agency practice in line with [Working together to safeguard children 2026: statutory guidance \(publishing.service.gov.uk\)](#)

They ensure those involved with the recruitment and employment of staff to work with children have received safer recruitment training and are compliant with safer recruitment practices. This includes the requirement for appropriate checks to be carried out in line with national guidance. For instance, when candidates have been shortlisted, they are made aware that searches via an online portal will be carried out by the school, with more in-depth checks taking place at the point of recruitment. (Part 3 Safer Recruitment [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)). The governing body ensure that all processes in place for safer recruitment are effective and that actions from audits of the single central record are completed timely.

Governors ensure that all staff have knowledge of the procedures in place for reporting concerns for any adult working or volunteering in our school. This includes an understanding of our Trust whistleblowing policy. Here at Foxhole Learning Academy we have a culture where staff can raise concerns about poor or unsafe practice, and such concerns are addressed professionally and sensitively in accordance with agreed procedures. Our safeguarding governor monitors the numbers of low-level concerns and those meeting the harm threshold to ensure this process is working effectively.

Further guidance on [whistleblowing](#) is available here and our governors ensure the DSL has shared the NSPCC whistleblowing helpline with all staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call 0800 028 0285 and the line is available from 8am to 8pm, Monday to Friday. Email: help@nspcc.org.uk

The Governing Body / Headteacher ensures that when they hire/rent out our school facilities/premises to organisations or individuals (e.g. community groups, sports associations, and service providers to run community or extra-curricular activities), that appropriate arrangements are in place to keep children safe.

The governing body ensures that the DSL has gained assurance that the provider concerned has appropriate safeguarding and child protection policies in place and that they are of the same high quality as our own. Where either the DSL or governor are not assured, we provide evidence to our governing body that we have ceased this activity whilst it is under review. We gain assurance from each provider that their staff have undergone the necessary safeguarding training and that all pre-employment checks we would ordinarily carry out ourselves have been completed.

The governors ensure that safeguarding leads or designated staff from our school visit these provisions / activities as they are taking place and that we document assurance on our single central record. They ensure the DSL has made arrangements for the provider to liaise with the school on any matters of safeguarding or health and safety concern where appropriate.

This applies regardless of whether the children attending these services or activities are on our school roll.

The Governing Body gains assurance that we include safeguarding requirements in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this leads to termination of the agreement.

For further information, please refer to:

[Keeping Children Safe in out-of-school settings](#)

9. The Designated Teacher

We appoint a Designated Teacher (DT) who works with the local authority to promote the educational achievement of registered pupils in our setting who are looked after, previously looked after, have a social worker, have previously had a social worker or are in kinship care. They promote and improve educational outcomes for children in care using evidence-based interventions.

The designated teacher at Foxhole Learning Academy is Mrs Alana McGovern

Our designated teacher has responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care, outside of England and Wales. They are appropriately trained and have the relevant qualifications and experience.

Our Designated Teacher works closely with Cornwall's Virtual School (Awena) to provide the most appropriate support, utilising Pupil Premium Plus funding, to ensure they meet the needs identified in the child's personal education plan (PEP).

At Foxhole Learning Academy we are attachment aware, and trauma informed and take a relational based approach to supporting our most vulnerable children, working restoratively with them to improve their outcomes.

We are aware of the extended role of the Virtual School from March 2024 to include oversight of those children with a social worker and in kinship care and the importance of supporting these children and families. Recognising attendance as a key factor in safeguarding, our designated teacher works closely with the Virtual School Heads and local authority to set and report on ambitious targets to improve the attendance for these children.

[Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK](#)

[Designated Teacher](#)

We ensure staff have been made aware of the "worrying statistics" relating to children in care [Children with complex needs can wait years for a stable home - GOV.UK \(www.gov.uk\)](#) and the role and importance of kinship carers, which is included in staff training. [What is kinship care? - Kinship Compass](#).

The designated teacher in our school is aware of the offer of supervision made to them by the local authority, to help support wellbeing within this role.

10. Working with parents/carers.

At Foxhole Learning Academy we are committed to working in partnership with parents/carers to safeguard and promote the welfare of their children, and to support them to understand our statutory responsibilities in this area.

Our safeguarding culture and ethos are to identify concerns at the very earliest opportunity and work collaboratively with parents and/or carers at an early support/family help level. This allows us to support parents to meet the needs of their own children, without the need for statutory intervention and acting before concerns escalate. We aim to work with

parents/carers, helping them to seek support or make referrals to other agencies and charities where appropriate and with their full consent. To this end, we encourage all parents/carers to take every opportunity to meet with our staff, including our safeguarding team, during school events and coffee mornings so that they feel more able to approach us when a concern arises.

We are committed to building trusted relationships with all parents/carers and extended family members.

A lack of parental engagement or agreement regarding concerns we have about a child however will not prevent us from making a referral to the local authority where we believe a child has been harmed, is at risk of harm or where a continued lack of engagement means that this is deemed necessary. On occasion, a lack of parental consent could be an indicator of concern. We will, however, always work hard to understand any barriers that exist to parents working with us or agreeing to support, including language barriers, learning disabilities, mistrust from previous social care involvement or previous discrimination based on protected characteristics.

When parents/carers are provided with this policy, they are informed of our legal duty to assist our safeguarding colleagues in other agencies with child protection enquiries.

To keep children safe and provide appropriate care for them, we require parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally resides.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above) and **at least 2 contacts**.
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).
- Any legal or criminal changes which effects parental responsibility e.g., bail conditions, court orders, Special Guardianship orders, Child Arrangement Orders.

We will retain this information on the pupil file and only share it with adults who have parental responsibility or where a parent has given permission, and the school has been supplied with the adult's full details in writing.

We recognise we are likely to be in regular contact with parents and carers and we use these communications to reinforce the importance of children being safe online. Our parents/carers find it helpful to understand what systems we use to filter and monitor online use in our school and it is especially important for them to be aware of what their children are being asked to do online, including any sites they are asked to access by us and (if anyone) their child is going to be interacting with online.

We update parents about safeguarding, including online harms through weekly newsletters, our school website and via dojo messages.

11. Cornwall's Early Support "universal services, community-based early help" and "the targeted early help level of Family Help."

Working Together 2026 and the Families First Partnership Guidance 2025 introduced the family help approach, a voluntary and coordinated system led by local authorities that merges targeted early help with statutory support to intervene early before needs escalate. Across Cornwall, a new early support / family help offer has been introduced to reflect this. Any child may benefit from support before statutory intervention, including from universal services, community-based Early support or family help.

Universal Services / Community based early support

Universal or community based early support are those that are accessible to all parents/carers and their children. We provide early support in our school in a variety of ways including play therapy, trauma informed counselling sessions, the SPACE programme [SPACE for Parents/Carers : Headstart Kernow](#), lunch clubs and food vouchers.

We are also happy to help support families to make their own referrals to local charities, to access GP appointments or to contact citizens Advice Bureau or housing.

The local authority has their own universal and community based early support offer, where amongst other things parents/carers can contact Kernow Education Advice Line (KEAL) to find the answer to any education related query. 01872 324497 [Kernow Education Advice Line - Cornwall Council](#) or seek independent support through the [Family Information Service](#) and [parenting offer](#).

If a parent/carer requires any help or support but they are unsure how or where to access it, we encourage them to ask any member of our school staff, who will help to find the appropriate service.

Targeted Early Help (Family Help)

For some families, early support may not be sufficient, and a period of targeted help may be required instead. All staff are aware of the family help process and understand their role in it. This includes being vigilant and identifying emerging problems, liaising with the DSL/DDSL and sharing information with other professionals to support the early identification and assessment of a child's needs. In some cases, and where parents agree, they may also act as the lead professional in a family help assessment. All staff receive training around the importance of all elements of family help, including targeted early help and child in need as part of Level Two training and are reminded about it in separate updates.

Any child may benefit from targeted early help; however staff are particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
 - has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
 - is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
 - is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - are misusing alcohol and other drugs themselves
 - is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child or a child in kinship care

Child in Need - Section 17 (Family Help)

Child in need forms part of Cornwall's family help offer and is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

As outlined in Working Together to Safeguard Children 2026, the local authority in Cornwall, together with their safeguarding partners and relevant agencies, have developed, agreed and published local protocols for assessments and support. In line with this guidance, assessments at this level may be led by a family support worker with the supervision of a social worker.

If the DSL considers the concerns they have for a pupil indicate that a Child in Need assessment is appropriate, they will speak with parents and/or carers and obtain their consent for a referral into Cornwall's Multi-agency support and safeguarding hub (MASSH), or the appropriate social care team if they reside or are the responsibility of a different authority.

In circumstances where parents refuse to give consent, but the child's needs are not being met, the DSL will discuss this with the MASSH. Appropriate school staff will attend Child in Need (CIN) meetings convened by Children's Social Care.

Guidance documents can be accessed at the following links:

- [Family Help - Cornwall Council](#)
- [Guidance for all Practitioners Working with Children](#)

12. What happens if a referral is deemed necessary to escalate beyond early support and family help

Child Protection (Section 47)

If the local authority has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, they make enquires under Section 47 to enable them to decide whether they should take any action to safeguard and promote the child's welfare. This duty also applies if a child is subject to an emergency protection order (under S44 of the Children Act 1989) or in police protective custody (under S46 of the Children Act 1989).

Children's Services will convene an Initial Child Protection Conference (ICPC) once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken, and the child is judged to be at continuing risk of significant harm. A review conference (RCPC) will take place once a child has been made the subject of a Child Protection Plan to monitor the safety of the child and the required reduction in risk. Between conferences, regular meetings of a core group will take place to monitor the progress of the child protection plan.

The DSL/DDSL (sometimes other staff members) will attend the child protection conference on behalf of the school. The person attending will have as much relevant and up to date information about the child as possible. They will contribute to any recommendations on the risks/protective factors for the family and a view on the continued need for a child protection plan. We understand the importance of attendance and contribution at these conferences and if, on rare occasions, no representative from our school can attend, we complete a detailed written report to be shared at the meeting.

Child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved and will work in an open, honest, and transparent way. Our responsibility is to promote the protection and welfare of

children, and our aim is to achieve this in partnership with our parents/carers wherever possible. We understand the importance of keeping children in the family home where possible and will work collaboratively with other agencies, parents, wider family members and children where appropriate to achieve this.

For advice and guidance or to make a referral, please contact Cornwall's Multi-Agency Support and Safeguarding Hub (MASSH) on (0300 123 1116). Or alternatively for the Isles of Scilly: Call 0300 1234 105 (Option 5)

13. Resolving professional differences

Safeguarding practice across Kernow Learning is grounded in a commitment to collaborative and respectful partnership working. We recognise we are more likely to achieve the best outcomes for children and families when we work collaboratively with others. However, we also recognise that protecting children sometimes requires the courage to challenge the decision making of others. This is particularly true when we believe the actions of partner agencies falls below the expectations we hold and where decision making threatens our commitment and promise to safeguard and protect all children in our care. In these instances, we will use the Resolving Professional Differences (RPD) process.

Where disagreements arise, we ensure that our professional challenge is seen not as conflict but as a shared responsibility to uphold the highest standards of safeguarding. By engaging openly with colleagues across agencies, we aim to strengthen collective decision-making across Cornwall, while honouring our promise to change and to save children's lives when they are at risk of harm or in need. Our determination to speak up, question, and escalate concerns, when necessary, reflects our unwavering belief and commitment that every child at Foxhole Learning Academy deserves safety, advocacy, and the strongest possible protection.

We will not cease challenge until we believe a child is adequately protected and safeguarded and are confident to use all levels of this process, including challenge to Heads of service or the OSCP when appropriate.

When significant harm or death has occurred to a child and where there are concerns about the way in which partner agencies have worked with us, we will hold others to account by calling for a Rapid Review/Learning review or make referrals to the IOPC. [We are the Independent Office for Police Conduct | Independent Office for Police Conduct \(IOPC\)](#)

[resolving-profess-diff-pol.pdf](#)

14. A safer school culture

Safer Recruitment and Selection

At Foxhole Learning Academy we pay full regard to 'Keeping Children Safe in Education 2026'. Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity, checking academic or vocational qualifications, obtaining professional and character references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks, prohibition checks (for teaching staff, teaching assistants and other relevant staff who may lead learning whilst not under the direction of a teacher) S128 checks for all senior leaders, governors and any individual who manages either someone or something. We also check whether individuals have been disqualified from providing childcare.

Although we accept employees into our school who are part of the DBS update service and complete all necessary checks, including having sight of the original DBS certificate, we always gain a Kernow Learning enhanced DBS in a timely manner.

Staff who have lived or worked outside the UK undergo the same checks as all other staff, even if they have never been to the UK. We ensure that any other appropriate checks are carried out so that relevant events that occurred outside the UK can be considered. These checks include criminal records checks for overseas applicants and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked. This needs to confirm that they have not imposed any sanctions or restrictions, and/or whether they are aware of any reason why they may be unsuitable to teach.

If it has not been possible to obtain an overseas check, despite our best endeavours, a robust risk assessment will be put into place, considering the enhanced DBS check, the quality of references and any other information pertaining to the potential employee.

In addition, as part of the shortlisting process our school carries out a search (via an online search engine) as part of our due diligence. This helps to identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. We inform shortlisted candidates that online searches may be done as part of due diligence checks and once an individual becomes an employee at our school, a full search (via an online search engine) is completed.

All volunteers taking part in regulated activity in our school have an enhanced DBS check including barred list check.

Evidence of all checks is recorded on our Single Central Record (SCR) and this is audited on a regular basis by our DSL and Trust Safeguarding Lead. A record of these audits is documented.

Guidance

- [Application process for criminal records checks overseas](#)
- [Regulated professions database](#)

Separate barred list checks are only carried out in the following circumstances:

- for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks have been carried out); or,
- where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as above have been carried out).
- For volunteers who have previously not had a barred list check included in their DBS check and who this now applies to (KCSiE 2026)

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of our pupils.

Relevant staff have undertaken appropriate training in Safer Recruitment and at least one trained safer recruitment member of staff is involved in **all** staff and volunteer recruitment processes and sits on the recruitment panel.

Once an individual has been recruited successfully, they are made aware of the systems we have in place to support safeguarding. These are explained as part of a robust staff safeguarding induction process, including:

- This Child Protection and Safeguarding policy which includes child-on-child abuse;
- The Behaviour policy;
- The staff code of conduct.
- The attendance strategy and our safeguarding response to children who are absent from education

- The role of the DSL (including the identity of the DSL and any deputies).
- Part one of KCSIE 2026
- The use of restrictive interventions within our schools.
- Searching, screening and confiscation
- Our low-level concerns policy.

If staff, supply staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. No visitors, volunteers or parent helpers will be left unsupervised with children or out of sight of the teacher or member of staff in charge if they do not have an enhanced DBS check. It is the responsibility of office staff and the DSL/DDSL to ensure this is the case.

In line with our site security procedures, all staff, visitors and volunteers will always wear a lanyard when on school site. There is no exception to this rule, and this is enforced by the DSL. However, all staff are vigilant to this and challenge any individual not wearing one.

All members of Kernow Learning staff wear their trust lanyards. Visitors wear either red or green lanyards depending on the DBS checking status they hold with us. Those without a check with us will wear a red lanyard and will be accompanied by someone who holds a DBS with us at all times. These coloured lanyards are on posters displayed around our school and are shared with children in assembly at the start of the year with regular reminders given as we move through the school year.

Guidance about acceptable conduct and safe practice are given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Where we dismiss a member of staff or if an agency does so because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we always consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. We continue to have regard to our duties under the PSED. [Public sector equality duty - GOV.UK](#)

15. Children with Special Educational Needs, Disabilities or Health Issues

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Staff in our school understand that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand what is happening to them is abuse
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours

in school or the consequences of doing so.

Any reports of abuse involving children with SEND therefore lead immediately to close liaison with the designated safeguarding lead (or a deputy) and the special educational needs coordinator (SENCO). Additional pastoral support and attention is always considered for these children, along with ensuring any appropriate support for communication is in place.

A child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place in our school, the responsible healthcare professional, in conjunction with the DSL will consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident.

In line with Benedict's Law 2026 (Children and Wellbeing Bill) our school has the following in place:

Whole-School Allergy Policy: Our school has adopted and published a comprehensive, standalone allergy policy.

Mandatory Staff Training: All staff have received annual allergy awareness and anaphylaxis training so they can confidently recognise symptoms and administer emergency treatments.

Emergency Medication: Our school stocks "spare" emergency adrenaline auto-injectors (AAIs) on site to be used on any child or adult experiencing anaphylaxis. (From January 2027)

Individual Care Plans: Our school implements specific Individual Healthcare and Allergy Action Plans for any pupil diagnosed with a severe allergy.

For more details, please see our Children with medical conditions policy and our allergy policy

16. Recognising mental Health as a safeguarding concern

Kernow Learning places the mental health of children directly at the heart of safeguarding, with all staff understanding that severe mental health issues (e.g., self-harm, suicidal ideation) are not just pastoral concerns, but safeguarding risks that require swift observation, early targeted support, and multi-agency intervention.

We have regard to the following key factors:

Indicator of Abuse or Neglect: drastic changes in a child's mental state can be an underlying sign that they have suffered or are at risk of abuse, exploitation, or neglect.

Early Intervention: we understand we play a crucial role in observing early signs of mental health issues and intervening before a vulnerability escalates into a full-blown safeguarding crisis.

Educational Attainment: Mental health is inextricably linked to a child's ability to engage with their learning. Emotional distress leads to poor concentration, behavioural issues, and reduced academic success.

Staff Roles: While education staff are not expected to diagnose or treat mental illnesses, they are relied upon to promote well-being, observe pupils, and appropriately refer cases to designated safeguarding leads or medical professionals.

17. Visitors to Our School

We receive a range of visitors to our school. These include professionals such as educational psychologists, social workers, and other education-related practitioners, as well as educational visitors like guest speakers or performers. We also host individuals connected to the site, including contractors working on the building or grounds, children's family members, or others attending school events such as sports days.

We do not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. We instead use our professional judgement about the need to escort or supervise such visitors.

For visitors in a professional capacity, we check identification and ensure that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks. We do not ask to see the certificate in these circumstances).

Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help us to enrich children's education, careful consideration is always given to the suitability of any external organisations. This includes an assessment of the education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required.

We undertake risk assessments and use our professional judgement and experience when deciding whether to seek an enhanced DBS for any volunteer not engaging in regulated activity. In doing so, we consider:

- What we know about the individual/company, including formal and informal information offered by staff, parents, other establishments, or volunteers.
- Whether the individual/company has other employment or undertakes voluntary activities where references can be advised, and suitability recorded.
- Whether the role is eligible for an enhanced DBS check.
- Decide upon the level of supervision required through a risk assessment – the supervision will be “reasonable in all circumstances to ensure the protection of children” as stated in KCSIE 2026.

We have clear visitor's procedures that enables us to offer pupil experiences of meeting other professionals to extend knowledge and curriculum. This clearly states whether they are supervised or unsupervised within the school.

On occasion, we may welcome older pupils into our school, as part of their work experience. Activity undertaken by a person aged 16 plus on work experience which takes place in our school and gives the opportunity for contact with children, may itself be regulated activity relating to children. In these cases, the work experience provider e.g. school or sixth form college should consider whether a DBS enhanced check should be requested for the child in question. DBS checks cannot be requested for children under the age of 16. Where children are on work experience therefore and under the age of 16, a risk assessment will be undertaken, they will wear a red lanyard in our school and will not be left unsupervised at any time in the presence of our pupils. Failure by a regulated member of staff to ensure supervision at all times of anyone on a red lanyard may lead to disciplinary action.

18. Opportunities to Teach Safeguarding

At Foxhole Learning Academy, we ensure children are taught how to keep themselves and others safe, including online. We recognise that effective education needs to be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND). In our school, relevant topics are included within Relationships and Health Education. In teaching these subjects we have regard to the DfE statutory guidance 2026. [Relationships and sex education \(RSE\) and health education - GOV.UK](#)

We understand we play a crucial role in preventative education and that this is most effective in the context of a whole-school approach that prepares our pupils for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

We have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled

lessons and reinforced throughout our whole curriculum. We ensure this programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with special educational needs and/or disabilities (SEND) and other Teachers' Standards.

Our programme tackles, at an age-appropriate stage, issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships
- healthy and respectful relationships
- boundaries, consent and kindness in relationships
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to – all forms of sexual harassment, and abuse, and how to access support,
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and
- understanding online harms such as the consensual and non-consensual sharing of self-generated intimate images and/or videos, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

We are aware of the one-stop hub for teachers. This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

[Relationships and sex education \(RSE\) and health education - GOV.UK](#)

[Teaching online safety in schools - GOV.UK](#)

[Free, time-saving teacher resources | Oak National Academy](#)

[UK Council for Internet Safety - GOV.UK](#)

[Using external expertise to enhance online safety education: Guidance for education settings - GOV.UK](#)

[CEOP Education](#)

[Speak out Stay safe | NSPCC Learning](#)

[Talk PANTS: Conversation to help keep children safe | NSPCC](#)

[Safeguarding, sexting and sharing nudes | NSPCC Learning](#)

[Free PSHE lessons on loss and bereavement | Child Bereavement UK](#)

[Free Mental Health Resources for Schools and Colleges | Anna Freud](#)

19. Keeping Children Safe in Education 2026 - Specific Safeguarding issues.

All staff have an awareness of the following safeguarding issues through regular training and briefings. Staff are aware that these behaviours can make children vulnerable and that this can put them in danger. Often these issues overlap. Staff are particularly aware of the behaviours linked to issues such as drug taking and/or alcohol misuse and are vigilant around unexplainable and/or persistent absence from our schools including patterns of lateness.

- Abuse (incl. Physical/Emotional/Sexual/Neglect/exploitation)
- Behaviours linked to safeguarding issues
- Bullying including cyberbullying
- Child on child abuse (including harassment and violence).
- Children and the court system
- Unexplainable or persistent absence from education
- Child missing from home or care
- Child Criminal Exploitation (CCE)
- Child sexual exploitation (CSE)

- County Lines
- Domestic abuse
- Drugs
- Perplexing presentations and/or fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Homelessness
- Mental health
- Online safety
- Private fostering
- Preventing extremism and radicalisation
- The Prevent Duty and Channel
- Serious violence
- Trafficking

20. Children potentially at greater risk of harm

All children should be protected however our staff, DSL/DDSL and Governing Body recognise that some groups of children are potentially at greater risk of harm than others. This list is not exhaustive but highlights some of these groups:

- Children who have a social worker (Child in Need & Child Protection)
- Children who have unexplainable or persistent absence from education
- Elective Home Education (EHE)
- Children requiring mental health support
- Looked after children and previously looked after children
- Children who are young carers
- Children who are living in circumstances including temporary accommodation or where there are issues including parental substance misuse or domestic abuse.
- Children with special educational needs & disabilities/health issues
- Children who are lesbian, gay or bisexual (LGBQ+)
- Are asylum seekers

Keeping Children Safe 2026 explains in more detail about these groups. We support these groups by keeping each child at the centre of our actions and by having:

- **Vigilance:** to ensure adults notice when things are troubling them
- **Understanding and action:** to be heard and understood; and to have that understanding acted upon.
- **Stability:** to be able to develop an on-going stable relationship of trust with those helping them.
- **Respect:** to be treated with the expectation that they are competent, rather than not.
- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans.
- **Explanation:** to be informed of the outcome of assessments, decisions and how they have been reached, positive or negative.
- **Support:** to be provided with support as well as a member of their family.

- **Advocacy:** to be provided with advocacy, to assist them in putting forward their views.

21. Our responsibilities relating to Approved Providers and Reduced Timetables

Where we place a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and therefore need to satisfy ourselves that the placement meets the pupils needs.

The cohort of pupils in Alternative Provision often have complex needs; and our governing bodies and proprietors of these settings are aware of the additional risk of harm that these pupils may be vulnerable to. We obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that we would otherwise perform on our own staff). This includes written confirmation that the alternative provider will inform us of any arrangements that may put the child at increased risk (i.e. staff or site changes), so that we can assure ourselves that appropriate safeguarding checks have been carried out on new staff or on new locations. Although the local authority has developed a register of approved settings, we remain ultimately responsible for the provision we commission. This means we continue to carry out safeguarding checks and conduct our own due diligence to ensure the provision is appropriate for meeting each child's individual needs.

We always know where a child is based during school hours, which includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We regularly review the alternative provision placements we make. Reviews are frequent enough (at least half termly) to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs.

Where safeguarding concerns arise, we immediately review the placement, and will terminate it, if necessary, unless or until those concerns have been satisfactorily addressed.

We follow all statutory guidance to which commissioners of Alternative Provision should have regard, including

[Alternative provision - GOV.UK](#) and [Education for children with health needs who cannot attend school - GOV.UK](#)

Reduced Timetables

We only use reduced timetables in exceptional circumstances, but where these are necessary, due to a medical need and to reintegrate a child back into our school community, we are aware that we retain responsibility for that child during all hours of our school day. We ensure that we are aware of where the child will be when not in school and who will be caring for them. This is documented clearly in our reduced timetable paperwork, and all arrangements are reviewed every two weeks to ensure their continued effectiveness and suitability. Reduced timetables are only put in place with the approval of our Trust Safeguarding Lead or Deputy CEO.

Our aim is always for reduced timetables to be temporary and last for a maximum of 6 weeks. All reduced timetables are reported to the local authority in line with local procedures and are only implemented with the consent of parents.

Reduced timetables are never used to manage behaviour.

For further information on our roles and responsibilities in relation to Approved Providers / Reduced timetables, please see our Trust-wide Attendance Policy.

22. Use of restrictive interventions including the use of reasonable force

There are circumstances when it is appropriate for staff in school to use restrictive interventions to safeguard children and young people.

- **Restrictive Intervention:** Any action that limits a pupil's movement, liberty, or independence. This includes both physical and non-physical interventions used in safety critical situations.
- **Reasonable Force:** A subtype of restrictive intervention; physical contact used when necessary to prevent harm, damage, or significant disruption.
- **Restraint:** A non-disciplinary intervention used to immobilise or limit movement of a pupil to prevent harm.
- **Seclusion:** Temporarily keeping a pupil separated from others and unable to leave for safety reasons, under continuous supervision.

Restrictive interventions can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

When using reasonable force in response to risks presented by children with SEN, disabilities, or with medical conditions, staff will consider the risks carefully. By planning positive and proactive behaviour support, for instance by drawing up individual behaviour plans for our more vulnerable children and agreeing them with parents and carers, we aim to reduce the occurrence of challenging behaviours and the need to use restrictive interventions.

Where any form of restrictive intervention is used, staff report its use without delay to the headteacher and to parents. The trust wide restrictive interventions form is completed and sent to the trust safeguarding lead. The incident is also recorded on a child's safeguarding record, including the justification for its use. Following all incidents, a debrief is held with the child and staff member to understand what led to the incident, what additional support may be required and what we can do to prevent a similar incident recurring.

The DSL and Trust Safeguarding Lead monitor the Use of Restrictive interventions to ensure it is not being used excessively and that no patterns are identified relating to either specific children, members of staff or locations within the school site. Where these are identified, consideration will be given to additional staff training or changes required to policy or process. Our Trust "Use of Restrictive interventions including reasonable force" policy should be referenced for further detail.

23. Allegations made against people in a position of trust including low level concerns

Our aim is to provide a safe and supportive environment, securing wellbeing and best possible outcomes for all children in our school. We take all possible steps to safeguard our children and to ensure any adult working in our school is safe to do so. However, we recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

The Governing Body for our school ensures we have procedures in place for dealing with the two levels (see below) of concern and/or allegations against staff members, supply staff,

trainee teachers, volunteers, and contractors:

- Allegations that **may** meet the harms threshold.
- Allegations/concerns that do not meet the harms threshold, referred to as '**low level concerns**'.

Allegations that may meet the harms threshold

We have a good understanding and give due regard to Part 4 of [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education) 2026 guidance and [Allegations against people who work with children - Cornwall Council](#)

We will always make a referral into Cornwall LADO (local authority designated officer) immediately (and at least within 24 hours) when it is alleged that anyone working in our school, has:

- behaved in a way that has harmed a child or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This relates to members of staff, supply staff, trainee teachers, volunteers, and contractors, who are currently working in or on behalf of our school, regardless of whether the school is where the alleged abuse took place. Allegations against a staff member who is no longer teaching and/or historical allegations of abuse are referred to the police.

We understand that if we are not the employer of an individual, we still have a responsibility to ensure allegations are dealt with appropriately. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Our headteacher / DSL will discuss with the agency who has supplied the staff member in these circumstances whether it is appropriate to suspend the individual, or redeploy them to another part of the school, whilst they carry out an investigation.

If an allegation is made, or information is received about an adult who works at our school which indicates they may be unsuitable to work with children, the member of staff receiving the information will inform the Headteacher immediately.

Should an allegation be made against a Head teacher, this will be reported to Lisa Farmer, the trust safeguarding lead or CEO Clare Crowle. The trust safeguarding lead or CEO will seek advice from the Local Authority Designated Officer (LADO) within one working day. No member of staff will undertake further investigations before receiving advice from key individuals.

If neither the trust safeguarding lead or CEO is contactable, the information must be passed to either Matt Middlemore, deputy CEO or Holly Sykes, Whistleblowing Trustee.

Learning lessons

It is important that lessons are learnt when managing all levels and types of allegations.

The headteacher in our school will review the circumstances of all substantiated cases with Cornwall's LADO and Lisa Farmer, our Trust Safeguarding Lead, to determine whether improvements can be made to our procedures to help prevent similar events occurring in the future. This will be done throughout the entirety of the process and at the point of conclusion.

Lessons will also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager will consider how future investigations of a similar

nature could be carried out without suspension, where possible.

Where an allegation is concluded to be either unfounded, false, malicious or unsubstantiated the headteacher/case manager (and if they have been involved the LADO) will consider the facts of each case and determine whether any lessons can be learned, and improvements made.

Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as ‘low level concerns’

At Foxhole Learning Academy we promote an open and transparent culture in which **all** concerns about adults are dealt with promptly and appropriately. Creating this culture enables us to identify inappropriate, problematic, or concerning behaviour early, minimising the risk of abuse and ensuring that adults who work in or on behalf of our school are clear about professional boundaries and act within them in accordance with our ethos and values.

Low level does not mean that the concern is insignificant. It is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt that an adult working in or on behalf of our school may have acted in a way that is:

- inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

We understand how crucial it is that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively, also protects those working in or on behalf of our schools from potential false allegations or misunderstandings. In our school there is a clear and consistent process for dealing with them. We have a trust wide low-level concern form which is available from the headteacher, DSL/DDSL or virtual staffroom and we encourage all concerns to be discussed in person, as part of our “open door” policy. All staff receive low-level concerns training at the point of induction which is refreshed on an annual basis.

If we are in any doubt as to whether information shared about a member of our staff as a low-level concern in fact meets the harms threshold, we consult with the LADO.

Our headteacher is sufficiently trained to understand the need to look for patterns in the reporting of low-level concerns and when they do arise, we learn lessons from each, which are documented, to ensure any potential concerns are not allowed to escalate.

Any member of staff or volunteer who does not feel confident to raise their concerns internally to our Headteacher, trust safeguarding lead or Trust Whistleblowing Officer, is aware they can contact the LADO directly.

We have a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of several listed offences. This applies particularly for those staff who have been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice

from the LADO (01872 326536) and/or HR. It is the DSL's responsibility to inform the Barring service. (All contact details can be found at the beginning of this policy and on the school website)

As a school we recognise how distressing it can be to be on the receiving end of an allegation. During all times of the process, we remain committed to being open and transparent with colleagues, where permitted and if staff are suspended from work, we ensure they have a point of contact in our school who ensures they feel adequately supported. Staff going through an allegation process are encouraged to access support through the SAS (Schools Advisory service), their GP or union representative.

24. Information sharing

Information sharing is vital in identifying and tackling all forms of abuse, neglect, and exploitation, and in promoting children's welfare, including in relation to their educational outcomes. We have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, our governing bodies and trustees recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place that set out clearly the processes and principles for sharing information within our school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

We are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care. Our governing bodies are aware that among other obligations, the data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. In this vein, they ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the data protection laws. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk, and
- for our school, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, we must withhold providing the data in compliance with our obligations under the data protection laws. Where in doubt we seek independent legal advice.

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information do not stand in the way of our need to safeguard and promote the welfare of children.

At Foxhole Learning Academy we work in partnership and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies in line with [Working together to safeguard children 2026: statutory guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/Working_together_to_safeguard_children_2026_statutory_guidance.pdf) & [Information sharing advice for safeguarding practitioners](https://www.gov.uk/guidance/data-protection-in-schools-sharing-personal-data)
[Data protection in schools - Sharing personal data - Guidance - GOV.UK](https://www.gov.uk/guidance/data-protection-in-schools-sharing-personal-data)

Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025

Our headteacher and governing body are aware that among other obligations, the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the data (use and access) Act 2025 place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. (See ICO guidance 'For Organisations' which includes information about our obligations and how to comply, including protecting personal information, and providing access to official information)

In addition, [Data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/data-protection-in-schools) helps us and our staff, governors and trustees to understand how to comply with data protection law, develop our data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

When children leave our school, the DSL ensures that any relevant Safeguarding file is transferred to the new setting as soon as the child has attended and within 5 working days, ensuring secure transit, with confirmation of receipt.

In addition to the safeguarding file, our DSL will also consider if it would be appropriate to share any information with the new school in advance of the child leaving. For example, information that would allow the new setting to continue supporting victims of abuse or children who require risk assessments.

Guidance documents:

- [Data Protection: Toolkit for schools](#)
- [ICO guidance for Organisations](#)
- [Dfe guidance data-protection-in-schools](#)

25. Managing complaints

In line with our trust ethos and culture, we encourage children and parents/carers to talk to us if they are unhappy with anything in our school, including our safeguarding practices. We have robust internal investigation processes.

Our complaints policy states clearly the various stages of complaint and where to escalate concerns following completion and outcome of our complaints process. Our complaints policy is available on all school website for parents/carers and is also available on request.

Safeguarding concerns should be raised with the school immediately. If a concern means a child is at immediate risk, then the individual should contact Cornwall's Multi-Agency Support and Safeguarding Hub (MASSH) on (0300 123 1116). All visitors are given safeguarding information which outlines how to share concerns.

26. Site Security

At our school we provide a secure site which is controlled by precise management directives, but our site is only as secure as the people who use it. All people on our site must adhere to the rules which govern it. Laxity can cause potential problems with safeguarding, therefore:

- Visitors gain access to our school through the main entrance.
- Visitors, volunteers, and pupils only enter through the main entrance and after signing in at the office. Visitors and volunteers are issued with a school lanyard. Each school has a clear system of ensuring any visitor or individual with a red lanyard are accompanied / supervised by a regulated staff member. Any visitor on site who is not identifiable by a visitor's lanyard will be challenged by any staff member or child and this will be reported to a member of the Senior Leadership Team.

- Parents, carers, and grandparents attending functions have access only through a designated and supervised entrance, with tickets for visitors for appropriate school events.
- Children will only be allowed home with adults with parental responsibility or confirmed permission.
- Empty classrooms should have closed windows and doors.
- Children are not allowed to leave school alone during school hours unless collected by an adult such as a parent who is doing so for a valid reason. They should report to the office to do this.
- A health and safety audit is completed annually with risk assessment/safety planning and forms part of the Governors annual report. This includes fire evacuation, lock down procedures and a Prevent risk assessment.
- The risk management of site security is managed by senior leaders/governance, and we have a clear system of risk assessments and timescales for review. Site security is overseen by our Trust safeguarding lead and our Premises manager.

Although at Foxhole Learning Academy our usual capacity is below 200, meaning we do not fall under the remit of Martyn's Law 2025, we nevertheless have in place all of the necessary requirements of this law. Staff receive specific Prevent training, a Prevent risk assessment is in place which is reviewed on an annual basis and we have lockdown procedures which are robust and practiced regularly. Our school Single point of contact (SPOC) oversees the effectiveness of all these procedures.

27. Early years foundation

Section 3 of the Early Years Foundation Stage (EYFS) statutory framework should be read alongside KCSIE where children aged 0 to 5 attend school-based nurseries or reception classes.

This framework is mandatory for all early years' providers (Early years foundation stage (EYFS) statutory framework updated September 2025): maintained schools; non-maintained schools; independent schools; all providers on the Early Years Register.

Every child deserves the best possible start in life and the support that enables them to fulfil their potential. Children develop quickly in the early years and a child's experiences between birth and age five have a major impact on their future life chances. A secure, safe and happy childhood is essential. Good parenting and high-quality early learning together provide the foundation children need to make the most of their abilities and talents as they grow up.

The Early Years Foundation Stage (EYFS) sets the standards that all early years' providers must meet to ensure that children learn and develop well and are kept healthy and safe. It promotes teaching and learning to ensure children's 'school readiness' and gives children the broad range of knowledge and skills that provide the right foundation for good future progress through school and life. For our staff who work in childcare provision or who are directly concerned with the management of such provision, our school ensures that appropriate checks are carried out to ensure that individuals are not disqualified under the Child Care (Disqualification) Regulations 2018. Further information on the staff to whom these regulations apply, the checks that should be carried out, and the recording of those checks can be found in the following document. Guidance documents:

- [Early years foundation stage \(EYFS\) statutory framework](#)

In our school we ensure at least one person who has a current paediatric first aid certificate is on the premises and available when children are present. This covers our breakfast club provision (where we have one), lunch times, wraparound care and residential and school trips.

The standards we set for safeguarding in any school-based nursery or early years provision are to the same high standard as across our school.

28. Appendix 1 - Definitions and Indicators of Abuse

Abuse, neglect and exploitation

Knowing what to look for is vital to the early identification of abuse, neglect, exploitation and modern slavery. All staff are aware of the indicators of abuse, neglect, exploitation and modern slavery so they can identify cases of children who may be in need of help or protection. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

If staff are unsure, they always speak to the designated safeguarding lead (or a deputy).

1. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
2. **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
 - Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
 - Protect a child from physical and emotional harm or danger.
 - Ensure adequate supervision (including the use of inadequate caregivers); or
 - Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect
- Affluent neglect

- Educational neglect

3. Physical Abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or
- Isolation from peers.

4. Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or object penetration) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet and/or use of Artificial Intelligence). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. This can be committed by an individual or an organised network and most sexual abuse is committed by individuals known to the victim.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.
- Unusual compliance.

- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

Following the Rotherham review and more recently noted in the Crime and Policing Bill 2026, all staff follow their mandatory reporting duty to report sexual abuse directly to the police. This is included in staff training.

Further help and support can be gained from the Lucy Faithful Foundation, who we work closely with: [Lucy Faithfull Foundation - Preventing child sexual abuse](#)

- 5. Emotional Abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug, or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

6. Parental response

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb).

- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the child.
- Unrealistic expectations or constant complaints about the child.
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the child from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

7. Disabled Children: When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child.
- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food, or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child's means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

29. Appendix 2 - Specific safeguarding issues

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of our school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [Home - Action Against Abduction](#) and [Home - Clever Never Goes](#)

Behaviours linked to safeguarding issues

All staff have an awareness of safeguarding issues that can put children at risk of harm. Presenting behaviours linked to issues such as drug taking and or alcohol misuse, **unexplained absence or persistently absent from education**, serious violence (including the link to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Bullying, including Cyberbullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (e.g., hitting, kicking, theft)
- Verbal (e.g., racist, or homophobic remarks, threats, name-calling)
- Emotional (e.g., isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying (including sexting)

Guidance on bullying can be [Preventing & tackling bullying](#)
[Cyberbullying advice](#)
[Cyber bullying: advice for headteachers and school staff](#)

Child on child abuse (including sexual violence and sexual harassment)

All staff have the knowledge and awareness that children are capable of abusing other children (including online). All staff are clear about our school's policy and procedure regarding child-to-child abuse.

Child-to-child abuse can occur, both physically and verbally, either online or face to face, between two children of **any** age and sex, with a single child or group of children and can happen both inside and outside of our school. Children who are victims of this abuse, will find the experience stressful and distressing and it is likely to have an adverse effect on their educational attainment. This type of abuse can exist on a continuum and may overlap, can occur online and offline (both physical and verbal) and are never acceptable.

All staff recognise the indicators and signs of child-to-child abuse and know how to identify it and respond to reports of it. They understand the importance of the **timely** challenge of inappropriate behaviours between peers, many listed below, that are abusive in nature and are aware of the importance of identifying any concerns at the earliest opportunity. They are aware of the importance of:

- Making clear that child-to-child abuse including sexual violence and sexual harassment, is never acceptable and that that we have a zero-tolerance approach.
- Not dismissing this abuse as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults e.g. grabbing bottoms, breasts, and genitalia, flicking bras and the lifting up of skirts.

All staff know that if we do not challenge and support our children that this will lead to a **culture** of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

We know that the initial response to a report from a child is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe. We never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. We reassure victims that they should not feel ashamed for making a report.

We have well promoted and easily understood systems in place so that our children feel confident to knowing their concerns will be treated seriously.

All victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school is not downplayed and will be treated equally seriously. A victim is never given the impression that they are creating a problem by reporting sexual violence or

sexual harassment. Victims are never made to feel ashamed for making a report. We ensure that children know that the law is in place to protect them rather than criminalise them, and we will explain this to them in such a way that avoids alarming or distressing them.

Staff are aware of the groups that are potentially more at risk as evidence shows that girls, children with SEND and LGBT children are at greater risk. The DfE states that child on child abuse (including harassment and violence should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Victims of child-to-child abuse will be supported by the school's pastoral system and referred to specialist agencies if appropriate. Risk assessments and/or safety planning are an integral part of this support plan, particularly regarding the post incident management.

All staff understand, that even if there are no reports in our setting, this does not mean that it is not happening, it may be the case that it is just not being reported. As such it is important that if our staff have any concerns regarding child-to-child abuse, they speak to the Designated Safeguarding Lead (DSL) or deputy (DDSL). Our staff will not develop high thresholds before acting.

Child-on-child abuse (including harassment and violence). is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence such as rape, assault by penetration including penetration by objects and sexual assault and may include an online element which facilitates, threatens and/or encourages sexual violence. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.
- Self-generated intimate images and/or videos including those generated using AI e.g. deepfakes. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff are aware of the importance of understanding intra familial harms and any necessary support for siblings following incidents.

All staff **are** clear as to the school's policy and procedures with regards to child-to-child abuse and the important role they play in preventing it and responding where they believe a child may be at risk from it.

All staff are aware that when managing incidents internally, we may decide that the children involved do not require referral to statutory services but may benefit from other support. Universal services and community based Early support play a crucial role in identifying emerging problems and providing support at an early stage. They are not an individual service, but a system of

support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area.

This level of Early support is provided through universal services and other voluntary and community services. This includes services such as education and health services, as well as support delivered through Best Start Family Hubs, youth services, after school clubs and housing provision.

The DSL / DDSL's know what the local Early support/family help process is and how and where to access support.

All DSL's / DDSL's are aware of the Hackett Tool and the Brooke Traffic Light Tool and use these to determine level of threshold and to direct action and support for a child who has displayed inappropriate/problematic or Harmful Sexual behaviour.

All DSL's / DDSL's are aware of Gweres Kernow and know that they can seek help, guidance and advice from this team regarding any incidence of child-to-child abuse.

If staff have a concern about a child or a child makes a report to them, they will follow our safeguarding referral process. As in any case, if staff are in any doubt as to what to do, they should speak to the DSL/DDSL. Our behaviour policy will support any sanctions.

Guidance Documents:

- [Disrespect NoBody campaign](#)
- [CEOP-Safety centre](#)
- [UKCIS Guidance: Sharing Nudes and Semi-Nudes](#)
- [Review of sexual abuse in schools and colleges - GOV.UK \(www.gov.uk\)](#)
- [Searching, screening and confiscation in schools](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Undressed \(lgfl.net\)](#)
- [Lucy Faithfull Foundation - Preventing child sexual abuse](#)

Unexplained absence or persistent absence from Education

All professionals working with children, as well as the wider community can help by remaining vigilant to children's safety. The law states every child should be receiving an education, and we stand a better chance of ensuring a child's safety if we know where and how they are receiving this. The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify children and young people of compulsory school age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for children who go missing from education.

A child who is absent from school with no explanation or who is persistently absent, particularly repeatedly, can be a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future. All staff are aware that when children are missing in education, they are rarely deliberately missing themselves or choosing not to attend, rather there is often an underlying safeguarding reason.

Our school holds **at least 2** emergency contact numbers for each pupil. If a child goes missing from our school and we are unable to locate them, we will inform parents/carers and we will also contact the Police to report them missing. This will ensure that the Police and other partners have a true picture of missing episodes, which are indicators of risk for some children.

In our school, we have robust monitoring procedures for attendance which alert us to the fact that

a child's whereabouts is not known within the first hour of the school day. Staff follow up on any absences promptly, with home visits made when appropriate.

The school notifies the Local Authority of any pupil/student who fails to attend school regularly after making reasonable enquiries or has been absent without the school's permission for a continuous period of 10 days or more. The school (regardless of designation) also alerts the Local Authority of any pupil/student who is to be deleted from the admission register because s/he:

- Has been taken out of school by their parents and is being educated outside the school system (e.g., elective home education);
- Has ceased to attend school and no longer lives within a reasonable distance of the school at which s/he is registered (moved within the city, within the country or moved abroad but failed to notify the school of the change);
- Displaced because of a crisis e.g., domestic violence or homelessness;
- Has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither s/he nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- Is in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe that s/he will return to the school at the end of that period; or
- Has been permanently excluded.

Whilst we understand that many children, whom parents decide to electively home educate will be safe and receive a good standard of education, this is not the case for all. We are aware of the potential risks to an electively home educated child and a child being "unseen" and possible safeguarding concerns. Where we have any concerns for a child who is withdrawn from our school roll, we will always make referrals into the MASSH and the child protection file will be forwarded to that team.

We will always take reasonable enquiries to ascertain the whereabouts of children that would be considered '[missing](#)'.

Children who are absent from education for prolonged periods and/or on repeated occasions can act as a vital warning sign to a range of safeguarding issues, including neglect, child sexual and child criminal exploitation - particularly county lines. It is important that our response to persistently absent pupils and children absent from education supports identifying such abuse, including exploitation and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support, includes the government guidance [Working together to improve school attendance - GOV.UK](#) which has now been made a statutory requirement within schools. This includes information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children missing education - GOV.UK \(www.gov.uk\)](#)
- General information and advice for schools and colleges can be found in the Government's [Missing Children and Adults strategy - GOV.UK \(www.gov.uk\)](#)

Child Missing from Home or Care

There are strong links between children involved in criminal and sexual exploitation and other behaviours such as unexplained absences from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse.

In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children.

Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Guidance document:

- [Children who run away or go missing from home or care](#)

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. We are also aware of the emerging trend and risk to children from so called “chicken shop” grooming. [What is chicken shop grooming? \(breckfoundation.org\)](#)

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm, from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being.
- children who misuse drugs and alcohol.
- children who go missing for periods of time or regularly come home late.
- children who regularly miss school or education or do not take part in education.

Guidance documents:

- [Safeguarding children who may have been trafficked](#)
- [Exploitation of children and young people - Cornwall Council](#)

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

This can be committed or facilitated by an organised network or gang, and victims may identify as part of this group. This may constitute modern slavery.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Guidance documents:

- [Child Sexual Exploitation Definition & Guidance](#)
- [Know about CSE](#)

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes, and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRM) should be considered via the Police. Further information can be found here [National Referral Mechanism](#)

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years.

- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Exploitation can be committed or facilitated by an organised network or gang, and victims may identify as part of this group. This may constitute modern slavery. Victims may be criminalised for actions taken under coercion, however we are aware that these children are victims and should be treated as such.

Guidance Document:

- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)
- [County Lines toolkit](#)
- [understanding the alpha victim - Google Search](#)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crime continues to represent one of the most significant and rapidly evolving threats within the United Kingdom's (UK) crime landscape.

Offences under the Computer Misuse Act 1990 (CMA) have risen substantially. Young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications. The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure. Cyber-dependent crimes include: • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded • 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and, • making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide preventative police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

Domestic Abuse

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family

members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life. We will signpost and support our children/ young people.

We are an Operation Encompass school and act appropriately when we receive an alert to support the children in our school.

Operation Encompass involves the sharing of personal and sensitive information about children and families. It is vital that within our school, we comply with the data protection laws. Police forces and educational settings are responsible for deciding how and where information about incidents and notifications are made. They must ensure it remains confidential, is held securely, and adheres to the requirements of the data protection laws. The designated safeguarding lead is responsible for leading on all safeguarding and child protection matters within an educational setting. They are likely to be the Key Adult for Operation Encompass notifications and are responsible for making safeguarding referrals to appropriate agencies, maintaining up-to-date safeguarding policies and training, overseeing record-keeping, and liaising with families where appropriate. DSLs may wish to use a central safeguarding inbox to ensure they have oversight over all Operation Encompass notifications.

The notification should include: • the police reference number • the name, date of birth and protected characteristics (e.g., disability, race, religion etc.) of any child from that education setting who is related to any adult involved in the incident, whether the adult is the alleged perpetrator or non-abusive relative • the relationship of the child to the victim and to the perpetrator • the location, time and date of the incident • if the child was present, and if so, where they were. (Notifications should be shared even if the child was not present at this particular incident), and • the voice of the child, such as what they are saying and how they are behaving. The notification should not include: • information or reference to sexual offences disclosed at the domestic abuse incident. This must not be disclosed in the notification. Under the Sexual Offences (Amendment) Act 1992, anonymity for victims of sexual offences must be preserved. The Operation Encompass charity provides an advice and helpline service for all staff members from education settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

Guidance Documents:

- [Domestic Violence and Abuse](#)
- [NSPCC-Domestic Abuse](#)
- Operation Encompass helpline 0204 513 9990 (8am-1pm Mon-Friday)
- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safe Young Lives: Young people and domestic abuse | Safelives](#)
- [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

- The Home Office publish guidance on [Controlling or coercive behaviour](#) which provides clear information on what constitutes controlling or coercive behaviour and how to identify the offence.

Drugs

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation.

Guidance Documents:

- [NSPCC-Parental Substance Misuse](#)
- [Drugs Advise for Schools](#)

Perplexing Presentations or fabricated and Induced Illness (FII)

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause.

There may be several explanations for these circumstances, and each requires careful consideration and review. Concerns about a child's health should be discussed with a health professional who is involved with the child.

[NHS-Overview-Fabricated or Induced Illness](#)
[Perplexing Presentations \(PP\)/Fabricated or Induced Illness \(FII\) in children – guidance - RCPCH](#)
[Child Protection Portal](#)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL are aware of local contact details and referral routes into local housing organisations, so they can raise/progress concerns at the earliest opportunity.

Indicators of risk include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this will **not** replace a referral into children's social care where a child has been harmed or is at risk of harm.

We also recognise that in some cases 16/17 yr olds could be living independently from their parents or guardians and they will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL will ensure that appropriate referrals are made based on the child's circumstances.

Children who are lesbian, gay, bisexual, or gender questioning

A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. We consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

It is not for our school to initiate any action when children question their gender. We understand that it is common for children to engage in activities that are less typically associated with their sex. For example, at primary school age, girls may play with trucks, or boys may dress in clothes that are perceived as feminine. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

We will therefore take time to understand the thoughts and feelings of any pupil who is questioning

their gender and show an appropriate level of professional curiosity about the full range of the child's experiences. We remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

We adopt policies across our school that maintain flexibility and avoid rigid rules based on gender stereotypes. Our school is a respectful environment where bullying is never tolerated. We know that bullying has a detrimental impact on young people's mental health and their ability to thrive at school and college. Bullying can affect a child's attainment and wellbeing. We are clear that all forms of bullying, for whatever reason, are unacceptable and take a strong stand against it.

Any request made by a child or parent to aid in transitioning, will result in our school working with parents to determine what is in the best interests of the child as well as considering any clinical evidence or advice. We will also seek advice from any additional non clinical professional where relevant (for example the SENCO) and DSL. In these situations, we will consider everything that could be affecting a child, including whether they have any wider health issues or neurodiversity. In considering the best interests of children, we adopt the principle of taking a careful approach and are conscious of safeguarding concerns relating to primary aged children.

We are aware of evidence from the Cass review that noted evidence that children who socially transition before puberty are more likely to proceed to a medical pathway than those who do not. We also keep in mind that some children who socially transition before puberty will be "living in stealth" meaning other pupils and/or staff may be unaware of their biological sex. We keep in mind the emphasis in the Cass Review on early clinical involvement when families are considering social transition for pre-pubertal children, including how to support their children in a non-directive way, whilst also keeping options open and flexible.

Honour-based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors, when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. It is known by several names including "cutting", "female circumcision" or "initiation". The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision, and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to "honour-based abuse".

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It is rare to see visual evidence, and children should not be examined but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers **must** personally report to the police cases where they discover that an act of FGM

appears to have been carried out. Unless there is good reason not to, they should still consider and discuss any such case with the DSL (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where staff do not discover that FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff will follow local safeguarding procedures.

Guidance Documents: -

- [Multi Agency Statutory guidance on Female Genital Mutilation](#)
- [Female Genital Mutilation Act 2003](#)

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into **without** the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. The threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some perpetrators use perceived cultural practices, to coerce a person into marriage. Schools and colleges play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person's parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life'. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

From February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

School and college staff can contact the Forced Marriage Unit for advice or information:
Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Guidance Document:

- [Forced Marriage](#)
- [The right to choose: government guidance on forced marriage](#)

Mental Health

All staff have an important role to play in supporting the mental health and wellbeing of our pupils and **are** aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Though we do not meet threshold for having our own designated MHST worker here at school, we do share regular updates and signposts to their services for families to use via our newsletters and Dojo posts. We seek mental health support advice where it is available and adopt all recommended strategies suggested to help support individual need.

Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to **observe** children day-to-day and identify

those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Guidance and helpful documents: -

- [Addressing Trauma and Adversity](#)
- [Mental Health and Behaviour in Schools Guidance](#).
- [Preventing and tackling bullying](#)
- [Every Interaction Matters](#)
- [MIND-Parenting Capacity and Mental Health](#)
- [NSPCC-Mental Health and Parenting](#)

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and by speaking to the designated safeguarding lead or a deputy.

Online Safety

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sextortion, sexual predation, and technology often provides the platform that facilitates harm.

It is essential for our children to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole school/college approach to online safety which empowers us to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: Exposure to illegal, inappropriate, or harmful material (e.g., self-harm sites, pornography, extremist views, fake news, and AI-generated misinformation).

Contact: Interactions with harmful users, including adults posing as children for grooming, as well as AI chatbots and roleplay bots that simulate human interaction. The 2026 draft specifies that interactions with AI companions are a contact risk, meaning schools must look beyond blocked keywords to monitor grooming dynamics.

Conduct: Personal online behaviour that can cause harm to self or others, such as cyberbullying, radicalization, or the sharing of self-generated intimate images (previously referred to as sexting).

Commerce: Risks associated with online financial exploitation, including gambling, in-app purchases, financial scams, and predatory advertising.

If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Consideration of these 4Cs (above) provides the basis for our Online Safety policy.

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have appropriate filtering and monitoring systems in place on school devices and school networks, and these are regulated, and risk assessed as part of the prevent duty.

Our filtering and monitoring standards will

- identify and assign roles and responsibilities to manage filtering and monitoring systems. review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs

The Governing body will review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

We have an online safety policy which identifies the usage and expected behaviour of children/students.

Furthermore, we understand the safety considerations and legal responsibilities when using Generative AI (either teacher-facing or pupil-facing)

Education at home/Remote learning: - Where children are being asked to learn online at home, our school will refer to and use the links and resources provided by the DfE; Safeguarding in schools, colleges and other providers and safeguarding in remote education.

Guidance Documents:

- [Children's Commissioner-Online Safety](#)
- [Teaching online safety in schools](#)
- [Appropriate Filtering and Monitoring](#)
- [CEOP-Safety Centre](#)
- [National Cyber Security Centre](#)
- [NSPCC-Undertaking remote teaching safely](#)
- [360 Degree Safe - Online Safety Review Tool](#)
- [UKCCIS-UK Council for Child Internet Safety](#)
- [Education for a Connected World](#)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: [Cyber Choices - National Crime Agency Online fraud & Cybercrime | Devon & Cornwall Police \(devon-cornwall.police.uk\)](#) [National Cyber Security Centre - NCSC.GOV.UK](#)

Guidance including that set out in [Plan technology for your school - GOV.UK](#) helps us to ensure that when planning and using digital technology in school, we are able to keep children safe. This ensures that we can prevent as far as reasonably possible cyber incidents and maintain our technology in a way that ensures we are [Meeting digital and technology standards in schools and colleges - Guidance - GOV.UK](#)

We are aware of the emergence of Artificial Intelligence and use the guidance [Generative artificial intelligence \(AI\) in education - GOV.UK](#) to ensure digital technologies are used safely in schools, including during lessons.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent. People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a school away from their home area.

Our staff will notify the DSL/DDSL when they become aware of a private fostering arrangement. There is a mandatory duty on the school to inform Cornwall Children's Social Care of a private fostering arrangement by contacting (0300 123 1116), who then have a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Guidance Document:

- [Children Act 1989 – Private Fostering](#)

Kinship Care

Kinship care is sometimes referred to as “A family and friends” care arrangement. It happens when a parent or someone else who has parental responsibility is no longer able to care for their child. The child then goes to live with a relative, a friend or other connected individual.

In the UK, there are more than 180,000 children in kinship care. Grandparents are the most common kinship carers, but older siblings, aunts, uncles, and people who know the child well can also take on the role. Individuals are known as a family and friend's carer if they are a grandparent, aunt, uncle, brother, sister or family friend looking after a child who can't be cared for by their birth parents. They must be approved as a foster carer if the local council has officially asked them to look after a child. If the local council didn't ask them to look after the child, they don't have to tell them the child has come to stay with them

Anyone giving full-time care to a child, can get information from:

- [Kinship](#)
- [The Family Rights Group](#)

In March 2024 the responsibilities of the Virtual School were extended to include children

living in Kinship Care

Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

We value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Pupils/students and school staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. We are clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the school's safeguarding duty.

Our designated safeguarding lead (and any deputies) are aware of local procedures for making a Prevent referral.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in **Appendix 4**.

Prevent Duty and Channel

Prevent

The school governors, the Head Teacher and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Our risk assessment at times may include consideration of the school's RE curriculum, SEND policy, Assembly Policy, the use of school premises by external agencies, integration of students by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

All schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty and is part of our schools wider safeguarding obligations.

Designated safeguarding leads and other senior leaders have familiarised themselves with the revised Prevent duty guidance 2023 [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115256/prevent-duty-guidance-2023.pdf): for England and Wales, especially paragraphs 57-76, which are specifically

concerned with schools (and covers childcare). We follow the guidance in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Our school has a Prevent Single Point of Contact (SPOC). This is Mrs Alana McGovern. They are the lead within our school for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

The SPOC for our trust is Lisa Farmer.

In our school we monitor online activity to ensure that inappropriate sites are not accessed by students or staff. This is done using specialist online monitoring software, called Senso. The DSL checks the SENSO alert page regularly to ensure all online devices are being used appropriately and no harmful material can be accessed by pupils.

Although at Foxhole Learning Academy our usual capacity is below 200, meaning we do not fall under the remit of Martyn's Law 2025, we nevertheless have in place all of the necessary requirements of this law. Staff receive specific Prevent training, a Prevent risk assessment is in place which is reviewed on an annual basis and we have lockdown procedures which are robust and practiced regularly. Our school Single point of contact (SPOC) oversees the effectiveness of all these procedures.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Cornwall Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.
- We have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Guidance Documents:

- [The Prevent Duty.](#)
- [Educate Against Hate](#)
- [ACT Early | Prevent radicalisation](#)

Serious Violence

There are a number of indicators, which may signal children are at risk from, or are involved in serious violence. These may include: • increased absence from school or college • a change in friendships or relationships with older individuals or groups • a significant decline in educational performance • signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and • unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. The likelihood of involvement in serious violence may be increased by factors such as: • being male • having been suspended, spent time in Alternative Provision or permanently excluded from school, and

- having experienced child maltreatment and having been involved in offending, such as theft or robbery. A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places. These times can be particularly risky for young people involved in serious violence. It is important that schools and colleges try to understand where these places are, with a view to working with partners to promote safety for children. Listening to children and consulting with staff can help establish when and where they feel unsafe. Working with wider partners can also help build understanding of the local context beyond the school or college and help co-ordinate a collective safeguarding response around the school day. Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) (the "what works" centre for preventing violence) has produced practical guidance for schools and colleges and an accompanying self-assessment tool to help introduce evidenced practice for preventing children becoming involved in violence. Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found here. As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined-up approach to young people across the risk spectrum. Police, Crime, Sentencing and Courts Act 2022 introduced a new Serious Violence Duty (Statutory Guidance) on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area. The Duty does not replace or duplicate existing safeguarding duties.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers

30. Appendix 3 - Allegations about a Member of Staff (Incl supply), Trainee teacher, Governor or Volunteer

1. Inappropriate behaviour by staff/supply staff/trainee teachers/volunteers could take the following forms:
 - **Physical**
For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.
 - **Emotional**

For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability, or sexuality.

- **Sexual**

For example, sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault, and rape.

- **Neglect**

For example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.

- **Spiritual Abuse**

For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

2. If a child makes an allegation about a member of staff, supply staff, trainee teacher, Governor, visitor or volunteer the Headteacher must be informed immediately. The Headteacher must carry out an urgent initial consideration to establish whether there is substance to the allegation. The Headteacher should not carry out the investigation him/herself or interview pupils.
3. The Headteacher will exercise and be accountable for their professional judgement on the action to be taken as follows:
 - If the actions of the member of staff, and the consequences of the actions, raise credible Child Protection concerns the Head Teacher will notify Cornwall's Designated Officer (**LADO**) (**01872 326536**). The LADO will liaise with our headteacher/DSL and advise about action to be taken and may initiate internal referrals within Cornwall Children's Social Care to address the needs of children likely to have been affected.
 - If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the pupil, these should be addressed through the school's own internal procedures.
 - If the Headteacher decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child safeguarding file.
4. Where we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers, trainee teachers and volunteers). In no circumstances will our school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Our Headteacher will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.
5. Where an allegation has been made against the Headteacher then Lisa Farmer, trust safeguarding lead takes on the role of liaising with the LADO in determining the appropriate way forward.
6. Where the allegation is against the CEO, the referral should be made to LADO directly.

30. Appendix 4 - Role of the Cornwall LADO

The Cornwall LADO (Local Authority Designated Officer) promotes a safer children's workforce by providing effective guidance, advice, and investigation oversight to cases. They may be able to offer advice and assist with communication in situations which sit outside the statutory criteria, albeit at the discretion of the LADO Duty Officer and where the broader goals of a safer children's workforce are relevant.

The service will give advice on how concerns or allegations should be investigated, including if a referral needs to be raised with the Police and/or Children's Social Care. Cornwall LADO is not directly responsible for investigatory activities but will actively support any investigation and give advice around a range of parameters including suspension, possible media interest, when to tell the adult, and ensure all interested parties are appropriately linked together. They will retain oversight of individual cases to ensure concerns or allegations are investigated thoroughly in a fair and timely manner, and will advise in relation to any subsequent duties to communicate with regulatory bodies and/or the DBS.

The inter-agency procedures for dealing with allegations against people in a position of trust is based on the framework for dealing with allegations made against an adult who works with children [Working together to safeguard children 2026](#) and should be followed by all organisations providing services for children and young people. Compliance with these procedures will help to ensure that allegations are dealt with consistently and in a timely manner, that a thorough, proportionate, and fair process is followed and that processes are open to challenge.

Arrangements for managing concerns or allegations of this nature should be robust and effective in keeping children safe. All allegations should be taken seriously, approached with an open mind, and not be driven by preconceived opinions about whether a child has or has not been harmed.

[Guidance for Safer Working Practice](#) is available which will help individuals form judgements on what may constitute behaviour that is unsafe or abusive.

Who to refer concerns to:

All reports of concern or allegation which include the following four criteria should be referred to the Cornwall LADO (Local Authority Designated Officer) Where an adult working or volunteering with children has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

Step 1: Follow KCSiE 2026 Guidance. Headteacher will contact Lisa Farmer, trust safeguarding lead for advice. The decision will then be made whether contact needs to be made with the LADO on 01872 326536

Step 2: The LADO will discuss directly with the school whether the concern meets the threshold for a referral or may provide advice or alternative signposting.

If your concern or allegation is urgent and outside of office hours telephone: 0300 1234 101 (Cornwall's Emergency Duty Team).

This single referral point will provide a responsive and inclusive service for all children's workforce sectors, focus the advice and support where it is needed most and enable the team to continue to work effectively with partners.

31. Appendix 5 - Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as: the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. (New definition – March 2024)
3. Extremism is defined by the Crown Prosecution Service as:
 - The demonstration of unacceptable behaviour by using any means or medium to express views which
 - Encourage, justify, or glorify terrorist violence in furtherance of beliefs
 - Seek to provoke others to terrorist acts
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts or
 - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Pupils may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff can recognise those vulnerabilities.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. [Managing risk of radicalisation in your education setting - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/managing-risk-of-radicalisation-in-your-education-setting)

6. Indicators of vulnerability include:
 - Identity Crisis – the student/pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
 - Personal Crisis – the student/pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
 - Personal Circumstances – migration; local community tensions; and events affecting the student/pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
 - Unmet Aspirations – the student/pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
 - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
 - Special Educational Need – students/pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. This list is not exhaustive, nor does it mean that all children experiencing the above are susceptible to being radicalised for the purposes of violent extremism.

8. More critical risk factors could include:

- Being in contact with extremist recruiters.
- Family members convicted of a terrorism act or subject to a Channel intervention.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and/or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

32. Appendix 6 - SPOC Contacts

Prevent Leads	Contact Name	Email Address
Trust Prevent Lead	Lisa Farmer	lfarmer@kernowlearning.co.uk
Cornwall County Council Prevent Lead	Steve Rowell	steve.rowell@cornwall.gov.uk

33. Appendix 7 - Useful safeguarding contacts

- Cornwall's Multi agency support and safeguarding hub (MASSH) on 0300 123 1116
- Local Authority Designated Officer (LADO) 01872 326536
- Emergency Duty Services (EDS-out of hours safeguarding concerns) 0300 1234 101
- Devon and Cornwall Police via 101, in an emergency please dial 999

Additional advice and support

There is a wealth of information available to support schools and colleges. The following list is not exhaustive but should provide a useful starting point:

Abuse

[Supporting practice in tackling child sexual abuse - CSA Centre](#) of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

[What to do if you're worried a child is being abused](#) – DfE advice

[Domestic abuse: Various Information/Guidance](#) - Home Office (HO)

[Faith based abuse: National Action Plan](#) - DfE advice

[Forced marriage resource pack](#)

[Disrespect NoBody campaign - GOV.UK](#) - Home Office website

[Tackling Child Sexual Abuse Strategy](#) – Home Office policy paper

[Together we can stop child sexual abuse](#) – HM Government campaign

Bullying

[Preventing bullying including cyberbullying](#) - DfE advice

Children missing from education, home or care

[Children missing education](#) - DfE statutory guidance

[Children who run away or go missing from home or care](#) - DfE statutory guidance

[Missing Children and Adults strategy](#) - Home Office strategy

Children with family members in prison

[National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

[Prisoners' Families Helpline](#) offers free, confidential support and advice for families in England and Wales who are in contact with the criminal justice system.

Child Exploitation

[Modern slavery: how to identify and support victims](#) - GOV.UK

[Interim guidance for ICTGs](#)

[Safeguarding children who may have been trafficked](#) - DfE and Home Office guidance

[Care of unaccompanied migrant children and child victims of modern slavery](#) – DfE statutory guidance

[Modern slavery: how to identify and support victims](#) – HO statutory guidance

[Child exploitation disruption toolkit](#) - HO statutory guidance

[County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council

[Multi-agency practice principles for responding to child exploitation and extra-familial harm](#) – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

[Preventing Child Sexual Exploitation | The Children's Society](#)

[What is county lines and child criminal exploitation?](#) - Missing People **advice**

[National Child Criminal Exploitation Support Service](#) - Missing People

Confidentiality

[Gillick competency Fraser guidelines](#) - Guidelines to help with balancing children's rights along with safeguarding responsibilities.

Drugs

[From harm to hope: A 10-year drugs plan to cut crime and save lives](#) - Home Office strategy

[Honest information about drugs](#) - Talk to Frank website

[Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association

Honour or Faith Based Abuse” including FGM and forced marriage

[Female genital mutilation: information and resources-](#) Home Office guidance

[Female genital mutilation: multi agency statutory guidance](#) - DfE, Department for Health, and Home Office

[Forced marriage](#) - Forced Marriage Unit (FMU) resources

[Forced marriage](#) - Government multi-agency practice guidelines and multi-agency statutory guidance

[FGM resource pack](#) – HM Government guidance

Health and Well-being

[Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England

[Supporting pupils at schools with medical conditions](#) - DfE statutory guidance

[Mental health and behaviour in schools](#) - DfE advice

[Overview - Fabricated or induced illness](#) - NHS advice

Homelessness

[Homelessness code of guidance for local authorities](#) – Department for Levelling Up, Housing and Communities guidance

Information Sharing

[Government information sharing advice](#) - Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.

[Information Commissioner's Office: Data sharing information hub](#) - Information to help schools and colleges comply with UK data protection legislation including UK GDPR.

Online safety-advice

[Childnet](#) provide guidance for schools on cyberbullying

[Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation

[London Grid for Learning](#) provide advice on all aspects of a school or college's online safety arrangements.

[NSPCC E-safety for schools](#) provides advice, templates, and tools on all aspects of a school or college's online safety arrangements

[Safer recruitment consortium](#) “guidance for safe working practice”, which may help ensure staff behaviour policies are robust and effective

[Searching screening and confiscation](#) is departmental advice for schools on searching

children and confiscating items such as mobile phones

[South West Grid for Learning](#) provide advice on all aspects of a school or college's online safety arrangements

[Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq

[Online Safety Audit Tool](#) from UK Council for Internet Safety to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring

[Online safety guidance if you own or manage an online platform](#) DCMS advice

[A business guide for protecting children on your online platform](#) DCMS advice

[UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help keep children safe online

Online safety- Remote education, virtual lessons and live streaming

[Guidance Get help with remote education](#) resources and support for teachers and school leaders on educating pupils and students

[Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely

[London Grid for Learning](#) guidance, including platform specific advice

[National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing

[UK Safer Internet Centre](#) guidance on safe remote learning

Online Safety- Support for children

[Childline](#) for free and confidential advice

[UK Safer Internet Centre](#) to report and remove harmful online content

[CEOP](#) for advice on making a report about online abuse

Online safety- Parental support

[Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, and to find out where to get more help and support

[Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents

[Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying

[Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls, and practical tips to help children get the most out of their digital world.

[London Grid for Learning](#) provide support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online

[Stopitnow](#) resource from [The Lucy Faithfull Foundation](#) can be used by parents and carers who are concerned about someone's behaviour, including children who may be

displaying concerning sexual behaviour (not just about online)

[National Crime Agency/CEOP Thinkuknow](#) provide support for parents and carers to keep their children safe online

[Parentzone](#) provides help for parents and carers on how to keep their children safe online

[Talking to your child about online sexual harassment: A guide for parents](#) – This is the Children’s Commissioner’s parental guide on talking to their children about online sexual harassment

[UK CMO commentary on screen time and social media map of reviews - GOV.UK](#)
advice for parents on screen time and social media

Private fostering

[Private fostering: local authorities](#) - DfE statutory guidance

Radicalisation

[Prevent duty guidance](#)- Home Office guidance

[Prevent duty: additional advice for schools and childcare providers](#) - DfE advice

[Educate Against Hate website](#) - DfE and Home Office advice

[Prevent for FE and Training](#) - Education and Training Foundation (ETF)

[Extremism and Radicalisation Safeguarding Resources](#) – Resources by London Grid for Learning

[The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK](#)

[Managing risk of radicalisation in your education setting](#) – DfE guidance

Serious Violence

[Serious violence strategy](#) - Home Office Strategy

[Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office

[Youth Endowment Fund](#) – Home Office

[Gangs and youth violence: for schools and colleges](#) – Home Office advice

[Tackling violence against women and girls strategy](#)- Home Office strategy

[Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance

Sexual violence and sexual harassment

Specialist Organisations

[Barnardo's](#) - UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.

[Lucy Faithful Foundation](#) - UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.

[Marie Collins Foundation](#) – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.

[NSPCC](#) - Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.

[Rape Crisis](#) - National charity and the umbrella body for their network of independent member Rape Crisis Centres.

[UK Safer Internet Centre](#) - Provides advice and support to children, young people, parents, carers and schools about staying safe online.

Harmful sexual behaviour

[Rape Crisis \(England & Wales\)](#) or [The Survivors Trust](#) for information, advice, and details of local specialist sexual violence organisations.

[NICE guidance](#) contains information on, amongst other things: developing interventions; working with families and carers; and multi-agency working.

[HSB toolkit](#) The Lucy Faithfull Foundation - designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families.

The Lucy Faithfull Foundation also run [shorespace.org.uk](#) which provides a safe and anonymous place for young people to get help and support to prevent harmful sexual behaviours.

[NSPCC Learning: Protecting children from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#)- free and independent advice about HSB.

[Contextual Safeguarding Network – Beyond Referrals \(Schools\)](#) provide a school selfassessment toolkit and guidance for addressing HSB in schools.

[Preventing harmful sexual behaviour in children - Stop It Now](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

Support for Victims

[Anti-Bullying Alliance](#) - Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.

[Rape Crisis](#) - Provide and signpost to a range of services to support people who have experienced rape, child abuse or any kind of sexual violence.

[The Survivors Trust](#)- UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse.

[Victim Support](#) - Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.

[Childline](#) provide free and confidential advice for children and young people.

Toolkits

[NSPCC](#) – Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.

[NSPCC](#) – Resources which help adults respond to children disclosing abuse.

NSPCC also provide free and independent advice about HSB: [NSPCC - Harmful sexual behaviour framework](#)

[Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire](#) - Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to peer-on-peer abuse.

[Contextual Safeguarding Network](#) – self-assessment toolkit for schools to assess their own response to HSB and levers for addressing HSB in schools.

[Childnet - STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge to support young people with special educational needs and disabilities (SEND).

[Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.

[Childnet - Step Up, Speak Up](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.

[NSPCC - Harmful sexual behaviour framework](#) an evidence-informed framework for children and young people displaying HSB.

Farrer & Co: [Addressing child on child abuse: a resource for schools and colleges](#). This resource provides practical guidance for schools and colleges on how to prevent, identify early and respond appropriately to child-on-child abuse.

Sharing nudes and semi-nudes

[London Grid for Learning-collection of advice](#) - Various information and resources dealing with the sharing of nudes and semi-nudes.

[UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) - Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

Support for parents/carers

National Crime Agency's [CEOP Education Programme](#) provides information for parents and carers to help protect their child from online child sexual abuse, including

[#AskTheAwkward - help to talk with your children about online relationships](#)
(thinkuknow.co.uk) guidance on how to talk to their children about online relationships