



# Child Protection and Safeguarding Policy

## Foxhole Learning Academy

### September 2024

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Statutory or Best Practice Policy	Best Practice
School or Trust Policy	School

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If you would like this information in any other format, please contact us on  
01637 303106 or email [info@kernowlearning.co.uk](mailto:info@kernowlearning.co.uk).

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# 1. Introduction

This policy is issued in line with Keeping Children Safe in Education 2024, which is statutory guidance from the Department for Education issued under Section 175/157 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Education and Training (Welfare of Children) Act 2021. We ensure that 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 the 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 alongside our Staff Code of Conduct. All staff read and understand the contents of Part One and Annex B of Keeping Children Safe in Education. [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/keeping-children-safe-in-education)

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

Whilst we are proud to be part of the Kernow Learning Multi-academy Trust, this policy has been individualised to reflect and meet the needs of our school.

## Links with Other Policies

This policy is linked to our wider safeguarding agenda to ensure that safeguarding is fully embedded across our school and community. When agreeing or reviewing this policy, we have regard for the links that are made with other relevant guidelines and procedures, including:

- a) Our Trust Whistleblowing Policy.
- b) Behaviour Policy
- c) Staff Code of Conduct
- d) Safer Recruitment.
- e) Low Level Concerns Policy.
- f) Use of Reasonable Force Policy.
- g) Preventing extremism and radicalisation policy.
- h) Young Carers Policy.
- i) Children in Care Policy.

And National guidance/legislation, including:

- [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/working-together-to-safeguard-children-2023)
- [Cornwall and the Isles of Scilly Safeguarding Partnership website \(ciossafeguarding.org.uk\)](https://www.ciossafeguarding.org.uk/)
- [What to do if you are Worried a Child is being Abused-Advice for Practitioners \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/guidance/what-to-do-if-you-are-worried-a-child-is-being-abused-advice-for-practitioners)
- [Behaviour in Schools - Advice for headteachers and school staff Feb 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/guidance/behaviour-in-schools-advice-for-headteachers-and-school-staff-feb-2024)
- [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/information-sharing-advice-for-safeguarding-practitioners)
- [The UN Convention on the rights of the child – with particular focus on Articles 3, 12, 13, 14, 16, 17, 18, 19, 22, 23, 25, 27, 28, 29, 30, 31, 33, 34, 35](https://www.unhcr.org/refugees/article/48cdd37d/the-un-convention-on-the-rights-of-the-child-with-particular-focus-on-articles-3-12-13-14-16-17-18-19-22-23-25-27-28-29-30-31-33-34-35)

## 2. Key Safeguarding Contacts

Role in school	Name	Contact Details
Safeguarding Trustee	Derek Rushton	<a href="mailto:drushton@kernowlearning.co.uk">drushton@kernowlearning.co.uk</a>
Whistleblowing Trustee	Holly Sykes	<a href="mailto:hsykes@kernowlearning.co.uk">hsykes@kernowlearning.co.uk</a>
Trust Whistleblowing Officer	David Houghton	<a href="mailto:dhoughton@kernowlearning.co.uk">dhoughton@kernowlearning.co.uk</a>
Trust Safeguarding and attendance Lead	Lisa Farmer	<a href="mailto:lfarmer@kernowlearning.co.uk">lfarmer@kernowlearning.co.uk</a>
Trust SEND Lead	Tanya Banks	<a href="mailto:tbanks@kernowlearning.co.uk">tbanks@kernowlearning.co.uk</a>
Headteacher	Kelly Davis	<a href="mailto:kdavis@kernowlearning.co.uk">kdavis@kernowlearning.co.uk</a>
Designated Safeguarding Lead (DSL)	Kelly Davis	<a href="mailto:kdavis.foxhole@kernowlearning.co.uk">kdavis.foxhole@kernowlearning.co.uk</a>
Deputy Designated Safeguarding Lead (DDSL)	Sarah Rayment	<a href="mailto:srayment@kernowlearning.co.uk">srayment@kernowlearning.co.uk</a>
Prevent Lead	Kelly Davis	<a href="mailto:kdavis.foxhole@kernowlearning.co.uk">kdavis.foxhole@kernowlearning.co.uk</a>
Nominated Governor for Safeguarding	Andrew Blizzard	<a href="mailto:ablizzard@kernowlearning.co.uk">ablizzard@kernowlearning.co.uk</a>
Nominated Governor for Attendance	Andrew Blizzard	<a href="mailto:ablizzard@kernowlearning.co.uk">ablizzard@kernowlearning.co.uk</a>
Chair of Governors	Andrew Blizzard	<a href="mailto:ablizzard@kernowlearning.co.uk">ablizzard@kernowlearning.co.uk</a>
Designated Teacher for Looked After Children	Kelly Davis	<a href="mailto:kdavis.foxhole@kernowlearning.co.uk">kdavis.foxhole@kernowlearning.co.uk</a>
Mental Health Lead	Kelly Davis	<a href="mailto:kdavis.foxhole@kernowlearning.co.uk">kdavis.foxhole@kernowlearning.co.uk</a>
SPACE practitioner	Kelly Davis	<a href="mailto:kdavis.foxhole@kernowlearning.co.uk">kdavis.foxhole@kernowlearning.co.uk</a>
TIS practitioner	Kelly Davis Carolyn May	<a href="mailto:kdavis.foxhole@kernowlearning.co.uk">kdavis.foxhole@kernowlearning.co.uk</a> <a href="mailto:cmay@kernowlearning.co.uk">cmay@kernowlearning.co.uk</a>
SENCo	Sarah Rayment	<a href="mailto:srayment@kernowlearning.co.uk">srayment@kernowlearning.co.uk</a>
PSHE / RSHE Lead	Lucy Crossley	<a href="mailto:lcrossley@kernowlearning.co.uk">lcrossley@kernowlearning.co.uk</a>

### 3. Purpose and aims

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

- **Are committed** to developing a robust safeguarding culture of vigilance and challenge.
- **Build resilience** by raising awareness of safeguarding and child protection issues, and equipping children with the language and skills to keep themselves safe.
- **Establish a safe environment** in which children can learn and develop within an ethos of openness and where children are taught to treat each other with respect, to feel safe, to have a voice and know they will be listened to.
- **Support vulnerable pupils** who have been abused, neglected or exploited, or those who have witnessed violence towards others or may be vulnerable to abuse, neglect or exploitation.
- **Support children and young people** in accordance with his/her agreed child protection plan, following the procedures set out by the OSCP and take account of all guidance issued by the DfE, Ofsted and other significant bodies.
- **Prevent unsuitable people** from working with children by ensuring we practice safer recruitment when checking the suitability of **all** school staff, supply staff and volunteers who work with our children and maintain an active, ongoing vigilance in line with our safeguarding culture.
- **Follow procedures** where an allegation is made against a member of staff and that such procedures are robust to deal with any allegation and that clear records of investigations and outcomes of allegations are held on staff files.
- **Risk-assess** any off-site activity, led by us, the school.
- **Risk-assess** and carry out due diligence for any parties providing any on-site activities in and outside of the school day.
- **Ensuring all staff implement procedures** for identifying and reporting cases, or suspected cases of abuse and regularly reviews them.
- **Keep written, dated and signed records** of concerns about “vulnerable” children including chronologies, even where there is no need to refer the matter immediately. This includes the use of any screening tool that aids identification of Neglect, Child Sexual Exploitation (CSE), Radicalisation, Children Missing Education, Female Genital Mutilation (FGM), on-line use or other such issues and that such records are securely kept.
- **Develop effective links** with relevant agencies and co-operate as required with their enquiries regarding early help and child protection matters including attendance at case conferences, if appropriate.

Our aim is to follow the procedures set out by:

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

By doing this, all staff know and understand that:

- Safeguarding and promoting the welfare of children is **everyone's** responsibility and the **voice of the child** is always heard and documented.
- **Everyone** ensures that their 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.

- Establishing a safe environment, which enables our children to learn and develop within an ethos of openness.
- Understanding that **no single practitioner** can have the full picture of a child's needs and circumstances.
- Ensuring our children and families 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, sharing information and taking prompt action.
- Providing children with a balanced curriculum including PSHE, healthy relationship education, online safety, child-on-child abuse and 'abuse outside the home' including county Lines, and Child Criminal and Sexual Exploitation.
- Supporting this with online activities, to enable children to enhance their safeguarding skills and knowledge whilst understanding the risks.
- Ensuring all staff enable children and young people at our school to achieve their **best outcomes**.
- Ensuring that as a school we have awareness of our staff's knowledge and understanding, as well as embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a **robust and embedded element** of our school practice and communities.

At Foxhole learning Academy we understand that our school and the staff within it, are an important part of the wider safeguarding system for our children and in this vein, we 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 our children's mental and physical health or development.
- **Ensure** that our children grow up in circumstances consistent with the provision of safe and effective care.
- **Take action** to enable **ALL** children to have the best outcomes.

This policy provides guidance to **all** adults working within our school, whether paid or voluntary, directly employed by the school or a third party and should be read in conjunction with: [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education) and [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/working-together-to-safeguard-children-2023-statutory-guidance)

We believe in the importance of strong governance and so:

- This policy sets out how our governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at this school.
- Our Governing Body, working with the senior leadership team and especially our Designated Safeguarding Lead (DSL), ensure that those staff who do not work directly with children read at least Part 1 or Annex A (condensed version of Part 1) of KCSiE 2024.
- All staff who work directly with children, are provided with, and have read and understood at least Part One of Keeping Children Safe in Education 2024 and Annex B.

## 4. Our ethos and culture at Foxhole learning Academy

At Foxhole Learning Academy, our children's welfare is of paramount importance to us, 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 that they will be supported and kept safe. They will never be given the impression that they are creating a problem by reporting abuse.

Children are encouraged to talk freely with staff if they are worried or concerned about something and our staff understand that a victim of any type of abuse should never feel ashamed for making a report. Their 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 that are built with staff. We therefore ensure there are alternative ways for children to report concerns, worries or thoughts, including “Things I wish my teacher knew” boxes and expression faces, emotion cards, draw and talk and bubbles of safety. We are also fortunate to have TIS trained practitioners within our school who are able to share their skills and expertise to support staff in the use of a wide range of approaches such as big empathy drawings and sand tray activities.

We are aware that children may not feel ready or know how to tell someone that 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 could be due to vulnerability, disability and/or sexual orientation or language barriers.

This does not prevent **ALL** staff from having professional curiosity and speaking to the DSL if they have concerns about a child. Our staff determine how best to build trusted relationships with children to facilitate this communication.

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. We expect **ALL** staff, governors, volunteers, and visitors to share our commitment of maintaining a safe environment and a culture of vigilance. This applies particularly for concerns that we may not come across very often in our school, but 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 safely and challenge inappropriate behaviours, that underpins this commitment. We work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need. However, all staff are aware that any child can be a victim or may be vulnerable at any moment within their lives.

We have a culture of vigilance and staff are confident and competent in the timely challenge of unacceptable behaviours, particularly in respect of child-to-child abuse. These are dealt with appropriately and robustly. 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 our partner agencies, including Gweres Kernow. [Gweres Kernow - Cornwall Council](#)

**All** staff are encouraged to report any concerns they have and not to dismiss these as insignificant. On occasions, 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 always consider the history of a child when making informed decisions about current levels of risk.

Our commitment to working with families, providing support and identifying neglect means that at least one member of staff has received the Graded Care Profile 2 training. As with other areas of safeguarding, this allows us to work closely with families and other agencies in identifying concerns early.

We know it is crucial that staff record and pass on any concerns in a timely manner and in accordance with this policy, to allow the DSL/DDSL to build up a picture and access support for children and families at the earliest opportunity.

When dealing with safeguarding matters, we are conscious of the language and terminology that we use, especially in front of children. Sometimes reference is made to a child who has been subjected to abuse 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.

In guidance, we will at times, use the term ‘alleged perpetrator’ and where appropriate ‘perpetrator’ and we know that these are widely used terms. However, we know that in many cases the abusive behaviour will have been harmful to the perpetrator and is likely to have been the result of trauma or harm that they have experienced. We are mindful of appropriate language and decide terminology on a case-by-case basis.

We work closely and restoratively with our safeguarding partners but have the confidence and knowledge to challenge decisions and practice if deemed appropriate. When challenge is necessary to improve outcomes for children, we remain professional, and child focussed.

We are committed to working with parents in a positive, open and transparent way. We ensure that all parents are treated with respect, dignity and courtesy and that our school is a welcoming space where parents 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. Internally, staff are encouraged to speak to the DSL when they have dealt with difficult and challenging situations in our school. The Trust Safeguarding Lead ensures that all headteachers/DSL’s are managing their workload and the stresses of dealing with safeguarding through case management supervision.

## 5. Equality

All staff are aware of their duties under the Equality Act 2010, and this forms an integral part of our Level Two safeguarding training.

Some children have an increased risk of abuse, and additional barriers can exist with respect to some children recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see 6.8)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- 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 violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- 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.

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



- Ensure that 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.
- Recognise that safeguarding children is the responsibility of everyone, not just those who work with children.
- Ensure that any training or events are managed to the highest possible safety standards.
- Review ways of working to incorporate best practice, including this policy being regularly reviewed and updated to reflect current best practice and Government expectations.
- Committed to ensure that we always demonstrate anti-discriminatory and anti-oppressive practice throughout the 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.
- Carefully recruit and select all employees, contractors and volunteers.
- Respond swiftly and appropriately to all complaints and concerns about poor practice and suspected or actual child abuse.
- Share information about concerns with agencies who need to know and involving parents and children appropriately in our decision making.
- Maintain an attitude of 'it could happen here' at all times.
- Ensure that all staff working on school sites are regularly reminded about the role they play in Safeguarding.
- Ensure all staff receive appropriate safeguarding and child protection training (including online safety and Prevent) during their induction, and that online safety training is provided as part of regular updates.

## 6. The role of all staff in keeping children safe

All staff have read and have a good understanding of **at least part 1 and Annex B** of [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115212/Keeping-children-safe-in-education-2024.pdf) 2024 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, Forced Marriage, FGM, Keeping Children Safe in Education (updates) and Low-level Concerns.

All staff receive **online safety training** which, includes an understanding of 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 \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115212/Meeting-digital-and-technology-standards-in-schools-and-colleges-Filtering-and-monitoring-standards-for-schools-and-colleges-Guidance-GOV.UK-2024.pdf). This training takes place at the point of induction and is updated on an annual basis. Training is specific to the filtering and monitoring systems used within our school so that staff understand the role that they need to play in raising awareness, being vigilant and being alert to any 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. We use a range of innovative ways of embedding knowledge, including quizzes, 7-minute briefings and scenarios.

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

All staff are aware of their responsibility to provide a safe environment in which children can learn.

All staff are aware of the indicators of abuse, neglect and exploitation and understand that children can be at risk of harm at school, inside their homes, online and in the community. Staff are confident in exercising **professional curiosity** and understand that knowing what to look for is vital for the early identification of any issues. They know it is essential to identify children who may need our help or protection and are aware that abuse, neglect and exploitation are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**Staff are particularly aware that abuse includes the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.** We are proud to be members of Operation Encompass and ensure that we respond quickly and appropriately to any information shared by police and other colleagues.

All staff, but especially the DSL/DDSL, consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms, including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse and other risks 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 non-consensual sharing of indecent images, 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 emergence of the role of Artificial Intelligence in these issues.

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 that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

All staff know how to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim is never given the impression that they are creating a problem by reporting **any** form of abuse, neglect or exploitation. Nor is a victim ever made to feel ashamed for making a report.

All staff are aware of the early help process and understand their role in it. They are confident to identify and support children who may benefit from this. **All staff are aware that they are in a privileged position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.**

All staff are aware of how to make a referral to children's social care, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) along with their potential role in such assessments.

All staff understand their responsibility to report concerns about the behaviour of any adult in our school and know that 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. Our safeguarding team within school operates an open-door policy to all staff and encourages anyone to challenge their 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 risk of harm.

In all cases, if our staff are unsure, they know that they can always 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)

For full details of the DSL/DDSL roles and responsibilities please refer to Part 2 & Annex C of [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education) 2024.

Our DSL/DDSL(s) have received appropriate safeguarding training to provide them with an understanding of their role and the knowledge and skills to carry out their duties. Our DSL and DDSL(s) 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 2023: statutory guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100000/working-together-to-safeguard-children-2023-statutory-guidance.pdf)

This training is updated on an annual basis and staff knowledge is regularly refreshed and updated. Safeguarding is a standing agenda item in all staff meetings and the DSL responds to any weaknesses or gaps in knowledge that they identify in the school. Both the DSL and Trust safeguarding Lead monitor the school's emerging concerns and training is focussed in these areas as appropriate. The DSL is given the necessary time, funding, training, resources, and support needed to carry out the role effectively and attends regular DSL Network Briefings.

Our DSL takes the **lead responsibility** for safeguarding and child protection (including online safety as well as an understanding of the expectations, applicable roles and responsibilities in relation to the filtering and monitoring systems and processes in place), and this is explicit in their job description.

Guidance:  
[Filtering and monitoring standards for schools and colleges](https://www.gov.uk/government/publications/filtering-and-monitoring-standards-for-schools-and-colleges)

As part of online safety, we are aware of our responsibility for information security and access management, and ensure we have the appropriate level of security protection measures in place to safeguard our systems, staff and children. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Guidance:  
[Cyber security standards for schools and colleges](https://www.gov.uk/government/publications/cyber-security-standards-for-schools-and-colleges)  
[Cyber Security Training for School staff](https://www.gov.uk/government/publications/cyber-security-training-for-school-staff)

During term time, the DSL/DDSL is available (during school hours) for staff to discuss any safeguarding concerns, either in person or on the phone. The DSL will sometimes delegate activities to the DDSL(s); however, the ultimate responsibility remains with them, and this lead responsibility is not delegated. In the absence of the DSL, the DDSL(s) will take a lead on safeguarding with clear direction from the Senior Leadership Team.

The DSL acts as a source of support, advice, and expertise for staff.

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

The DSL ensures **all** staff and regular visitors have appropriate safeguarding training to equip them for their role in 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. Any non-compliance is shared with the Senior Leadership Team/Governing body.

The DSL monitors Ed:gen (safeguarding manager), the electronic system used to record concerns about children, ensuring that the quality of information is accurate and detailed and that assessments/referrals are made appropriately and in a timely manner. The recording and

storing of information is kept in-line with the [Data Protection Act 2018](#) and General Data Protection.

The DSL/DDSL ensures all staff receive training on the quality of record keeping and monitors the quality of safeguarding records through auditing case files regularly. Safeguarding records are also audited by the Trust Safeguarding Lead and appropriate and regular supervision takes place with the DSL. This may be extended to other members of staff if deemed appropriate.

Records include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

And by the DSL/DDSL:

- The justification for any action / referrals made or not.
- Comments on any lessons learnt from a child's experience that can improve outcomes moving forward.

They ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice.

The DSL, DDSL's, attendance lead and SENcO hold weekly case management discussions (with attendance by at least 2 individuals) to ensure that the crossover between safeguarding, attendance and behaviour is constantly considered and that everything has been done to ensure our children are protected and able to achieve their best outcomes. These meetings are documented, with clear actions and considerations recorded on a child's safeguarding file.

Safeguarding and child protection records, if they are in paper form, are kept in a secure location, away from academic records and we have clear recording processes to document the transfer of files to other settings.

Our school use a transfer of records form which is signed by the sending and receiving settings and a copy of this form is kept by both. We ensure that the transfer of records is completed only when the child has attended the receiving school and within 5 working days. In specific circumstances, where a child requires support due to experiencing abuse or where a risk assessment needs to be put into place prior to the child arriving, the DSL may make the decision to share information early. Where this decision is made, the justification for this is clearly recorded.

When a parent chooses to remove their child/ren from school to receive EHE (Elective Home Education), the DSL will pass on any safeguarding concerns and the safeguarding file, if there is one, to the EHE Team within Cornwall County Council. They will also inform other professionals who may be involved with that child. If the DSL has safeguarding concerns, they will ensure that they are shared in a timely manner with Cornwall's multi-agency referral unit. The same process applies for those children who are defined as Children Missing education, where the child's records will be sent to that 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.

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 by liaising with relevant agencies.

The DSL/DDSL will refer cases of suspected abuse, neglect and/or exploitation to the local authority children's social care, as required, and support other staff to make these referrals.

The DSL/DDSL will represent school at child protection conferences and core group meetings and will be the expert within our school to support staff in liaising with other agencies, making assessments and any referrals. Any staff member may be required to be part of strategy discussions or other interagency meetings and contribute to the assessment of child/ren. The DSL/DDSL will notify children's social care without delay if a child with a child protection plan is absent from school without explanation.

The DSL/DDSL helps to promote the educational outcomes of looked after children (LAC), previously looked after children (PLAC), children with a social worker and children who have previously had a social worker 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 will support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children. The Designated Teacher in our school discusses 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 is aware of the importance of teaching about healthy relationships and health as part of a comprehensive and effective PSHE offer **and ensures there is 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 DSL is aware of the importance of learning from Child Safeguarding Practice Reviews, regardless of whether the 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 2023. 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 that we are engaged, involved and included in any safeguarding arrangements, acting as the presumptive 4<sup>th</sup> partner.

The DSL has a good understanding of the community in which the school sits and serves, the risks and its resilience. Our DSL, works in collaboration with other local schools in the area, including the main feeder secondary school. Regular cluster meetings are held with the headteachers of those schools to build relationships, strengthen community links and create wider opportunities for the families we serve. We maintain positive links with local community services such as police, fire service, RNLI and road safety officers to ensure that our children are equipped with the skills and knowledge to keep themselves safe in the community.

We work closely with the mental health support teams (MHST) and hold and signpost regular workshops for both children and parents on a range of topics such as resilience, wellbeing and relationships. We have built positive links with local authority services and have a designated family worker who regularly visits our school. Our school also runs the SPACE parenting programme (supporting parents and children emotionally) which is a trauma-informed educational programme suitable for any parent or carer wanting to learn more about their own and their children's behaviours and emotions and how to build resilience.

## 8. Our Governing Body

At Foxhole Learning Academy we have an incredibly strong and knowledgeable Governing Body who have strategic leadership responsibility for safeguarding arrangements. They ensure that we comply with our duties under legislation. They have regard to this guidance in ensuring policies, procedures and training are effective and comply with the law. See Part 2 [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)

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

This training equips the senior leadership team, governors, Trust safeguarding lead and trustees with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a

robust whole school approach to safeguarding. This training is regularly updated.

The Governing Body ensure that all staff, including governors, receive appropriate safeguarding and child protection training (including online) at induction. This training is regularly updated and in line with any advice from our safeguarding partners.

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

The Governing body discusses with I.T staff and service providers what more needs to be done to support our setting in meeting a set of standards. This includes:

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

If the governing body become aware of any concerns, they bring these to the attention of the Trust Safeguarding Lead.

Guidance:

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

The Governing Body are aware of their responsibility to ensure that there is the appropriate level of security protection in place needed to safeguard systems, staff and learners and understand the need to review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. 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 and proprietors 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 facilitate a whole school approach to safeguarding involving everyone in school, ensuring that safeguarding is at the forefront of everyone's mind, underpinning all relevant aspects of process and policy development. These systems, processes and policies operate with the **best interests** of our children at the forefront of what we do. The safeguarding and attendance governor speak to several children during termly monitoring visits to ensure that children feel safe and that our safeguarding procedures are effective.

The Governing body has appointed the Designated Safeguarding Lead (DSL) who takes **lead responsibility** for safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). This is explicit in their job description, and they ensure that the DSL understands their responsibility in leading safeguarding across the school. They also ensure that the DSL is given additional time, funding, training, resources, and support needed to carry out the role effectively. See Annex C [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)

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

The Governing body and Trustees ensure that children are taught about how to keep themselves and others safe, including online. It is recognised that effective education is tailored

to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. We have an expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment which requires teachers to have a clear understanding of the needs of all pupils.

Resources

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

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 the school's safeguarding action plan which is a working document, containing clear actions that are completed in a timely manner to improve safeguarding practices further. Our school completes trust safeguarding audits however these audits compliment and do not replace the statutory return to the local safeguarding partnership.

Our Governing Body ensure that our school contributes to inter-agency practice in line with [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#)

The Governing Body ensure that those involved with the recruitment and employment of staff to work with children have received safer recruitment training and are compliant with safer recruitment procedures. This includes the requirement for appropriate checks to be carried out in line with national guidance. When candidates have been shortlisted, they are made aware that online searches 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 \(www.gov.uk\)](#))

We have a current Trust whistleblowing policy and staff are aware of this and understand its content. 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 whistleblowing procedures.

Further guidance on [whistleblowing](#) is available here and the NSPCC whistleblowing helpline is available for 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](mailto:help@nspcc.org.uk)

When the Governing Body / Headteacher 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), they ensure that appropriate arrangements are in place to keep children safe.

The governing body or headteacher will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place and that these are of the same high quality as our own. Where we are not assured in respect of safeguarding policies, we will ask for this to be reviewed. We gain assurance that all staff have undergone the necessary safeguarding training required and that all pre-employment checks that we would ordinarily carry out ourselves have been completed. We visit these provisions / activities as they are taking place and document our assurance on the single central record. We ensure that arrangements are in place for the provider to liaise with the school on any matters of safeguarding concern or health and safety where appropriate.

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

The Governing Body ensures that safeguarding requirements are included 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

The Governing body have appointed 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, those with a social worker and those who have previously had a social worker. They promote and improve educational outcomes for children in care using evidence-based interventions.

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.

The Designated Teacher works closely with Cornwall's Virtual School (Awena) to provide the most appropriate support, utilising Pupil Premium Plus funding, to ensure that 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 children to improve their outcomes. Relationships are at the heart of our school and are what makes it such a special place to be. All of our staff have had training in trauma informed approaches and this can be seen in every interaction between staff and children. We believe that every interaction is an intervention, and we ensure that this starts from the very beginning of every day where every child is greeted by an adult. Where needed, we offer children more bespoke intervention to support them to manage and understand their emotions.

We are aware of the additional duties of the virtual school headteacher extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. We understand the role that we play in improving outcomes for these children.

[Virtual Headteacher Role-Children with a social worker](#)

[Designated Teacher](#)

The governors ensure that all 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 of the role and importance of kinship carers, which is included in staff training. [What is kinship care? - Kinship Compass](#)

## 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.

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.

We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard a child from harm.

We will seek to share with parents/carers any concerns we may have about their child before making a referral, unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns we have about a child will not prevent the DSL from making a referral to the local authority in those circumstances where it is appropriate to do so.

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 that 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 and it is especially important for them to be aware of what their children are being asked to do online by the school, including any sites they are asked to access and (if anyone) their child is going to be interacting with online.

At Foxhole Learning Academy we update parents about safeguarding, including online harms through regular newsletters, our school website, social media platforms and our internal communication system 'Class Dojo'. We have a parent information board in our reception area which also shares a wide range of information including safeguarding. Parents are sent home weekly information about the PSHE curriculum topics that their child has been taught and a link to related information and areas for discussion that they can use with their children.

We ensure that we build trusted relationships with all parents/carers prior to any safeguarding concern emerging so that they feel able to approach us.

## 11. Cornwall's Earliest & Early Help

Any child may benefit from earliest or early help, but **all** 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 showing signs of being drawn into 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 experienced multiple suspensions, is at risk of being permanently excluded from school and/or an Alternative Provision or a Pupil Referral Unit.**
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- 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
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

- is a privately fostered child.

This list is not exhaustive.

The DSL ensures that **all** staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL/DDSL, sharing information with other professionals to support the early identification and assessment of any issues or concerns. In some cases, and where parents agree, they may also act as the **lead professional in an early help assessment**. All staff receive training around the importance of earliest and early help as part of their Level Two training and are reminded about it in separate updates.

Guidance documents can be accessed at the following links:

- [Early help - Cornwall Council](#)
- [CIOS Safeguarding Children Partnership - Threshold Tool](#)

## 12. What happens if a referral is deemed necessary to escalate beyond early help.

### Child in Need (Section 17)

If the DSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, they will speak with parents and obtain their consent for a referral into Cornwall's Multi-agency referral unit (MARU), or the appropriate social care team if they reside or are the responsibility of a different authority. If parents refuse to give consent, but the child's needs are not being met, the DSL will discuss these issues with the MARU. Appropriate school staff will attend Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require Section 17 services.

### 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 our attendance and contribution at these conferences and if, on rare occasions, no representative from the school can attend, we will 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.

## 13. Escalation process

Cornwall and the Isles of Scilly Safeguarding Children's Board expects members of staff working directly with families to share information appropriately and work to plans agreed in all relevant forums. Good practice includes the expectation that constructive challenge amongst colleagues, and between agencies, provides a healthy approach to our work.

This process will be kept as simple as possible, and the aim will be to resolve difficulties at a professional practitioner level, wherever possible and always in a restorative way. We recognise that differences in status and experience may affect the confidence of some staff to pursue this course of action, and support should be sought from the DSL/DDSL.

If we believe that concerns regarding a child are not being addressed and outcomes are not improving, we understand the expectation that we will escalate our concerns in line with Cornwall's Conflict Resolution Policy (Resolving Professional Difference) until a satisfactory conclusion is reached. When we use professional challenge and/or the professional difference process we will set out clearly what we want to achieve, what we expect to happen and the desired outcome. Our focus will always be on the child.

## 14. A safer school culture

### Safer Recruitment and Selection

At Foxhole Learning Academy we pay full regard to 'Keeping Children Safe in Education 2024'. 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**) whether they are known to the police and/or social care, if they have been disqualified from providing childcare and any relevant overseas information. Evidence of these checks is recorded on our Single Central Record (SCR) and this is audited on a regular basis by the Trust Safeguarding Lead and Kernow Learning Central HR Team. A record of these audits is documented.

Staff who have lived or worked outside the UK **will** 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 could 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 confirming 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.

#### 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).

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.

At least one of our trained safer recruitment staff is involved in **all** staff and volunteer recruitment processes and sits on the recruitment panel. A member(s) of the Governing Body has received Safer Recruitment training.

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-to-child abuse;
- The Behaviour policy;
- The staff code of conduct.
- The attendance strategy and our safeguarding response to children who are missing from education; and
- The role of the DSL (including the identity of the DSL and any deputies).
- At least part one of KCSIE 2024 and Annex B.
- The use of reasonable force within our schools.
- 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. Doors should have a clear glass panel and where possible be left open. 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. It is the responsibility of the member of staff to ensure this is the case.

Guidance about acceptable conduct and safe practice will be 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.

## 15. Educational visitors to school

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.
- Decided upon the level of supervision required through risk assessment – the supervision will be “reasonable in all the circumstances to ensure the protection of children” as stated in KCSIE 2024.

We have clear visitor's procedure 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.

## 16. Keeping Children Safe in Education 2024 - 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 that this can put them in danger and that 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 school.** Please read and refer to Appendix 2 for additional information and guidance on the below topics.

- Abuse (incl. Physical/Emotional/Sexual/Neglect/exploitation) Annex 1
- Behaviours linked to safeguarding issues
- Bullying including cyberbullying
- Child on child abuse (inc sexual violence and sexual harassment/sexting-sharing of nude/semi-nude images & upskirting)
- 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

### 17. 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

Paragraphs 170-204 of Keeping Children Safe 2024 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 in their own right as well as a member of their family.
- **Advocacy:** to be provided with advocacy, to assist them in putting forward their views.

## 18. Consideration for the mental health of children and their wellbeing, particularly for SEND children.

We will always consider providing additional pastoral support and attention for any child who is deemed to be vulnerable, including those with special educational needs. This includes ensuring any appropriate support for their communication is in place. **This is particularly important for children who have special educational needs, are deaf, or who are disabled.**

Further information can be found in the department's:

- [SEND code of practice: 0 to 25 years - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/send-code-of-practice-0-to-25-years), and
- [Supporting pupils with medical conditions at school - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/supporting-pupils-with-medical-conditions-at-school)
- [Home - SEND IASS - Cornwall \(cornwallsendiass.org.uk\)](https://cornwallsendiass.org.uk/)
- [Mencap and Sport England join forces to help people with a learning disability to get active in Cornwall | Active Partnerships](https://www.nspcc.org.uk/what-we-do/our-work/active-partnerships/mencap-and-sport-england-join-forces-to-help-people-with-a-learning-disability-to-get-active-in-cornwall/)
- [Children with special educational needs and disabilities \(SEND\) | NSPCC Learning](https://www.nspcc.org.uk/what-we-do/our-work/active-partnerships/children-with-special-educational-needs-and-disabilities-send/)
- [Safeguarding d/Deaf and disabled children and young people | NSPCC Learning](https://www.nspcc.org.uk/what-we-do/our-work/active-partnerships/safeguarding-d/deaf-and-disabled-children-and-young-people/)

## 19. Our responsibilities relating to Approved Providers and Reduced Timetables

On occasion, we may place a child with an alternative provision provider to enhance their educational experience and welfare. **When this happens, we continue to be responsible for the safeguarding of that pupil and need to be satisfied that the placement meets the pupil's needs, and that the child will be appropriately safeguarded whilst there.**

The cohort of pupils in Alternative Provision often have complex needs, and it is therefore important that our headteacher and governing body is aware of the additional risk of harm that

these pupils may be vulnerable to.

We therefore have a comprehensive checklist that we complete for any child attending these settings, which forms part of our attendance policy. This includes ensuring that all staff have undergone all relevant pre-employment checks, that they have received an appropriate level of safeguarding training, and that assurance is gained from our regular visits to the setting.

The department for education has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard: • [Additional health needs guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614442/Additional_health_needs_guidance.pdf) and • [Education for children with health needs who cannot attend school - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614442/Additional_health_needs_guidance.pdf)

## Reduced Timetables

We only use reduced timetables in exceptional circumstances, but where these are necessary, usually 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 and Attendance Lead or the Deputy CEO.

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

## 20. Use of reasonable force

There are circumstances when it is appropriate for staff in school to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This 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. Departmental advice for schools is available [here](#).

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 reasonable force. Where reasonable force is used, this is always recorded on a child’s safeguarding record, including the justification for its use. All incidents are reported to the Trust Safeguarding Lead and Safeguarding Governor/chair of governors.

The DSL and Trust Safeguarding Lead monitor the Use of Reasonable Force 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 Reasonable Force” policy should be referenced for further detail regarding this.

## 21. Allegations made against/concerns raised in relation to

## teachers, including supply teachers, other staff, volunteers, and contractors

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

The Governing Body ensures that there are procedures in place for dealing with the two levels (see below) of concern and/or allegations against staff members, supply staff, volunteers, and contractors:

- Allegations that **may** meet the harms threshold.
- Allegations/concerns that do not meet the harms threshold, referred to for the purposes of this guidance 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/consultations/keeping-children-safe-in-education) 2024 guidance and [Allegations against people who work with children - Cornwall Council](#)

We will always make a referral into Cornwall LADO 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, 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 will be 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 the Head teacher, this will be reported to David Houghton, Chief Operating Officer. If neither the Headteacher nor David Houghton is contactable on the day, the information must be passed to and dealt with by either The Trust Safeguarding Lead or the member of staff acting as Headteacher.

The Headteacher or David Houghton 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 the LADO.

### Learning lessons



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

The headteacher at Foxhole Learning Academy will review the circumstances of all substantiated cases with Cornwall's LADO and the Trust Safeguarding Lead, to determine whether improvements can be made to the school's 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 suspending the individual.

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 the 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 school from potential false allegations or misunderstandings. In our school we have a clear process for dealing with them. We have low-level concern forms which are available from the headteacher, DSL/DDSL 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 that 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 the Headteacher or our Trust Whistleblowing Officer, is aware that 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 a number of 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 and/or HR. It is the DSL's responsibility to inform the Barring service.

### **Safeguarding Induction for new or supply staff / regular visitors or volunteers.**

We all have a statutory duty to safeguard and promote the welfare of children, and at our school we take this responsibility seriously.

We ensure that the induction of our staff is robust and comprehensive and that all visitors or volunteers to our school, know who the DSL is and how they can raise or share a concern.

We make sure that everyone knows not to believe that their worry is insignificant if it is about hygiene, appearance, or behaviour – we would rather they told us as we would rather know about something that appears small than miss a worrying situation.

All staff, visitors and volunteers are advised that if they think the matter is serious and may be related to child protection, for example, physical, emotional, sexual abuse, neglect or exploitation they must find one of the Designated Safeguarding Leads and share with them immediately the details of their concern.

If they are unable to locate them, they can ask a member of the school office staff to locate them and to ask them to speak with them immediately about a confidential and urgent matter.

Any allegation concerning a member of staff, a child's foster carer or a volunteer should be reported immediately to the Head teacher. If an allegation is made about the Head teacher, you should pass this information to the Trust Whistleblowing lead, Trust safeguarding lead or directly to the Local Authority Designated Officer on 01872 326536. (All contact details can be found at the beginning of this policy and on the school website)

## **22. Information sharing**

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 2023: statutory guidance \(publishing.service.gov.uk\)](#) & [Information sharing advice for safeguarding practitioners](#)

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

As part of meeting a child's needs, our Governing body recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place to set out clearly the processes and principles for sharing information within our setting and with children's social care, the safeguarding partners, 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 the local authority children's social care.

## Data Protection Act 2018 and the UK GDPR

Our headteacher and governing body are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) 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 to be in place.

The Data Protection Act 2018 and GDPR 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 and protect the safety of children.

Guidance documents:

- [Data Protection: Toolkit for schools](#)

## 23. Managing complaints

In line with our school ethos and culture, we encourage children and parents/carers to talk to us if they are unhappy with anything to do with school. We have a robust internal investigation process.

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 our school website for parents/carers and is also available on request.

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

## 24. Site Security

At Foxhole Learning Academy we provide a secure site which is controlled by precise management directives, but the 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:

- Gates are kept closed during the school day; visitors gain access through the main entrance.
- Visitors, volunteers, and students only enter through the main entrance and after signing in at the office visitors and volunteers will be issued with a school lanyard or visitor's pass. Our school has a clear system of ensuring staff are accompanied / supervised by 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 the designated and supervised entrances, 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.
- Two members of staff are always on duty at break times.
- 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.

## 25. Early years foundation

This framework is mandatory for all early years' providers (**Early years foundation stage (EYFS) statutory framework** 4th Sept 2023): 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 important in its own right. 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, the 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 the following document. Guidance documents:

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

As a school we ensure that at least one person who has a current paediatric first aid certificate is always on the premises and available when children are present. They always accompany children on outings.

## 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 and exploitation. All staff should be aware of the indicators of abuse, neglect and exploitation, so that they are able to 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 should 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 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 oral sex) 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.

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, all staff have a mandatory reporting duty to report sexual abuse directly to the police.

5. **Emotional Abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), 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..

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.

### 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.

**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.



## 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](#)

### Child to 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 at Foxhole Learning Academy 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 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-to-child abuse 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 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.

- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery) 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 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 \(lgfl.net\)](#)

## 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 MARU 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 being 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 missing 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:

[Working together to improve school attendance - GOV.UK \(www.gov.uk\)](http://www.gov.uk) including 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 \(www.gov.uk\)](https://www.gov.uk/government/statutory-guidance/children-missing-education)
- General information and advice for schools and colleges can be found in the Government's [Missing Children and Adults strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/missing-children-and-adults-strategy)

## 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? \(breckfoundation.org\)](https://www.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.

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. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girlfriends and/or suffering from sexually transmitted infections/becoming pregnant.

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.

Guidance Document:

- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)
- [County Lines toolkit](#)

## 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.

Guidance Documents:

- [Domestic Violence and Abuse](#)
- [NSPCC-Domestic Abuse](#)
- Operation Encompass helpline 0204 513 9990 (8am-1pm Mon-Frid)

## 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

(N.B. This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published)

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. 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.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder. It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that our staff endeavour to reduce the additional barriers faced and create a culture where any child can speak out or share their concerns with any member of our team.

### 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 [fm@fcdo.gov.uk](mailto:fm@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.

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.

Our headteacher is also our designated senior mental health lead and oversees the wider work around mental health support within our school. Support is provided through our rich curriculum, targeted intervention and support and through access to wider support services such as the MHST. Our mental health lead works closely with our SENDCo to ensure that the individual needs of those children with identified SEMH needs are fully met and that as a result they can access an ambitious curriculum.

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.

At Foxhole Learning Academy we realise that 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, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. 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.

**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.

### Our Approach to Online Safety at Foxhole Learning Academy

At Foxhole Learning Academy, we adopt a comprehensive and proactive approach to online safety that encompasses education, monitoring, and intervention. We aim to empower children, staff, and the wider community with the knowledge and skills necessary to navigate the digital world safely and responsibly.

Our weekly 'project evolve' class assemblies incorporate elements of:

- Self image and identity

- Online relationships
- Online reputation
- Online bullying
- Managing online information
- Health, well being and lifestyle
- Privacy and security
- Copyright and ownership

During computing units of learning, our children are accessing different devices and websites and each child is provided with their own unique login which enables our school to monitor online activity. The use of the SENSO filtering and monitoring system on all children's devices restrict access to any inappropriate content and ensures that any concerns are immediately flagged to the designated safeguarding lead.

Children are regularly reminded about safe and appropriate internet usage and use of the Safer Internet SMART rules matters are displayed in classrooms as reference.

S - safe

M - meet

A - accepting

R - reliable

T - tell

Throughout the school year we recognise a range of days and events such as safer internet day and this is marked in assembly. However, at Foxhole Learning Academy we recognise the importance of weaving internet safety as a golden thread through all computing planning and within wider cross curricular and personal development opportunities.

Foxhole Learning Academy is committed to ensuring a safe and responsible use of technology within our community. By integrating online safety into our policies, curriculum, and community engagement efforts, we strive to create a secure and informed environment for all students, staff, and parents.

Online safety considerations are included in various school policies, including behaviour, safeguarding, remote learning and IT acceptable use policies to ensure that both staff and children have a good understanding of online safety and the responsibilities and procedures around this. All staff reinforce online safety messages and practices in their interactions with children and will refer common sense media when choosing age-appropriate content.

Our school utilises wider educational resources such as 'Wake up Wednesday' from The National College to raise awareness of current issues and technologies and to enable parents to make informed decisions about their children's use of technology. This is done through our in school information board, our internal communication system 'Class Dojo', via social media and on our school newsletter. We have an open-door policy for our parents and they are able to message or speak to us directly if they have any concerns.

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](#)

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 \(devon-cornwall.police.uk\)](https://www.devon-cornwall.police.uk) [National Cyber Security Centre - NCSC.GOV.UK](https://www.ncsc.gov.uk)

## 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 at Foxhole Learning Academy 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](#)

## 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.

At Foxhole Learning Academy 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. Foxhole Learning Academy is 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 school's 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/114111/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) who is the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the DSL.

The SPOC for our school is Kelly Davis

Our School monitors online activity within the school to ensure that inappropriate sites are not accessed by students or staff. This is best done using specialist online monitoring software, which in this school is called Senso.

## 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 Devon and 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.
- Schools 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

All staff are aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or

unexplained injuries. 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. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Guidance documents:

- [Home Office Preventing Youth Violence and Gang Involvement](#)
- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)

### 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



## Appendix 3 - Allegations about a Member of Staff (Incl supply), Governor or Volunteer

1. Inappropriate behaviour by staff/supply staff/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, 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 the Chair of Governors 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 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 or Proprietor, then David Houghton, Chief Operating Officer (COO) takes on the role of liaising with the LADO in determining the appropriate way forward.

6. Where the allegation is against the sole proprietor, the referral should be made to LADO directly.

## 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, this is detailed in [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115421/working-together-to-safeguard-children-2023-statutory-guidance.pdf) 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 2024 Guidance. Headteacher will contact 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.

## 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.

## Appendix 6 - SPOC Contacts

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

## Appendix 7 - Useful safeguarding contacts

- Cornwall's Multi agency referral unit (MARU) 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

#### Child Exploitation

[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

## 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

## (So-called) “Honour 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

## 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

[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