



Penryn College

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Child Protection and Safeguarding Policy

Approved by	Full Governing Body
Date approved	To be completed on approval
Reviewed	September 2026
Responsible SLT member	F Williams
To be reviewed	September 2027
Published	Website

Named Designated Safeguarding Lead: Fiona Williams

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1. Aims

The school aims to ensure that:

Safeguarding is everyone's responsibility. Penryn College maintains a child-centred approach, acts on concerns without delay and works with children, families and safeguarding partners so that children receive the right help at the right time.

Appropriate action is taken in a timely manner to safeguard and promote children's welfare. All staff are aware of their statutory responsibilities with respect to safeguarding. Staff are properly trained in recognising and reporting safeguarding issues.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), the Maintained schools governance guide and Academy trust governance guide.

The school complies with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3). This policy is also based on the following legislation:



It should also be read with the current statutory and departmental guidance relevant to safeguarding in education, including the revised Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance effective from 1 September 2026; Working Together to Improve School Attendance; the Prevent duty guidance; the DfE filtering and monitoring standards; Searching, Screening and Confiscation; and statutory information-sharing guidance. From 30 September 2026, the school will comply with the Information Sharing Duty under section 16LA of the Children Act 2004 and any applicable local multi-agency information-sharing arrangements.

Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school; The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18 Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM; The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children; Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children; Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism; The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR); The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation).

This means our trustees and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. This policy is implemented alongside the school's governance arrangements and all applicable statutory duties.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Safeguarding is everyone's responsibility. Our approach will be child-centred, which means that we will consider at all times what is in the best interests of the child. Children and families should receive the right help at the right time. Where appropriate, this may include community-based early help and Family Help.



Child protection is part of safeguarding and refers to the activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is 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 the impact on a child of seeing, hearing or experiencing the ill-treatment of another. Appendix 1 provides further information about different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (sometimes referred to as 'sexting' or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This includes images that have been digitally manipulated or generated, including through the use of artificial intelligence (AI), where they appear to depict a child.

'Children' includes everyone under the age of 18.

The **three safeguarding partners**, as defined in the Children Act 2004, are:

- The local authority.
- The integrated care board for an area within the local authority.
- The chief officer of police for an area within the local authority.

Safeguarding partners make arrangements to work together, and with relevant agencies, to safeguard and promote the welfare of children in their area and to identify and respond to their needs.

Victim is a widely understood and recognised term. However, we recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. When managing an incident, we will use terminology that is appropriate and sensitive to the child involved.

Alleged perpetrator(s) and **perpetrator(s)** are also widely used and recognised terms. We will think carefully about the terminology we use, particularly when speaking with or about children. Where the alleged perpetrator is a child, we recognise that they may themselves have additional needs or have experienced harm. Terminology will therefore be considered on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some with respect to 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 recognise that discrimination, prejudice and discriminatory bullying can themselves cause harm and can also create barriers to children seeking or receiving help. Staff will be alert to these barriers and will respond appropriately to concerns.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND)(see section 10)
- Have medical or health conditions (see section 10)



- Are young carers
- May experience discrimination, prejudice or bullying because of their race, ethnicity, religion or belief, sex, sexual orientation, disability or other individual circumstances
- Are lesbian, gay or bisexual, or are perceived by others to be lesbian, gay or bisexual
- Are questioning their gender
- Have English as an additional language (EAL)
- Are known to be living in difficult circumstances – for example, temporary accommodation, poverty, or where there are issues such as substance misuse or domestic abuse
- Are at risk of female genital mutilation (FGM), sexual exploitation, criminal exploitation, forced marriage, modern slavery, trafficking or radicalisation
- Are asylum seekers, refugees or otherwise have insecure or uncertain immigration circumstances
- Are at risk due to their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Have a social worker or have previously been known to children's social care (see section 11)
- Are missing or absent from education for prolonged periods and/or repeatedly
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- Are accessing alternative provision or education away from the school site.

In applying this policy, the best interests of the child will remain central to our decision-making. Staff will maintain professional curiosity and will not make assumptions about a child's needs, experiences or circumstances on the basis of any protected characteristic or other aspect of their identity.

5. Roles and Responsibilities

Safeguarding and preventative education

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and trustees in the school and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school, extracurricular and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain and creating a culture in which **sexism, misogyny/misandry, racism, homophobia, biphobia, transphobia, sexual harassment, sexual violence and other forms of prejudice, discrimination and derogatory behaviour are not tolerated.**

We recognise that sexual harassment and sexual violence are never acceptable and will not be tolerated. We will challenge inappropriate behaviours between children that are abusive in nature, including sexual harassment and sexual violence.

Our whole-school approach will be underpinned by our:

- Behaviour policy
- Safeguarding and pastoral support systems
- Staff training and safeguarding procedures
- Planned programme of Relationships, Sex and Health Education (RSHE), which is inclusive, age and developmentally appropriate and delivered regularly. This includes teaching about:
 - Healthy, respectful relationships and friendships
 - Boundaries, privacy and consent
 - Stereotyping, prejudice, discrimination and equality
 - Body confidence and self-esteem
 - How to recognise unhealthy or abusive relationships, including coercive and controlling behaviour



- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, sexual offences, domestic abuse, forced marriage, female genital mutilation (FGM) and other forms of so-called 'honour'-based violence, and how to access support
- What constitutes sexual harassment, harmful sexual behaviour and sexual violence, and why these behaviours are always unacceptable
- Online safety and appropriate online behaviour, including the safe and responsible sharing of information and images and the risks associated with AI-generated or manipulated content.

All staff

All staff have a responsibility to provide a safe environment in which children can learn and will maintain the attitude that 'it could happen here' where safeguarding is concerned.

All staff will:

- Read and understand Part One of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, in full, and review the guidance at least annually. Staff should also be familiar with relevant information contained within the annexes of KCSIE as appropriate to their role.
- Sign a declaration at the beginning of each academic year to confirm that they have read and understood the required guidance.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online, including the sites, services and technology they may be asked to use and who they may be interacting with online.
- Provide a safe and supportive environment in which all pupils, including those who are lesbian, gay or bisexual, or questioning their gender, feel able to speak about their concerns and seek support.

All staff will be aware of:

- Our systems that support safeguarding, including this Child Protection and Safeguarding Policy, the Staff Code of Conduct, Behaviour Policy and Online Safety Policy; the role and identity of the designated safeguarding lead (DSL) and deputies; and the school's safeguarding response to children who are absent from education.
- Community-based early help and Family Help, where appropriate, and their role in identifying children who may benefit from help and support as soon as needs emerge, liaising with the DSL and sharing information with other professionals where necessary.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- The importance of acting immediately on any safeguarding concern and not delaying action. Concerns should be reported to the DSL or a deputy without delay and staff should follow the procedures set out in this policy.
- What to do if they identify a safeguarding concern or a child tells them they are being abused, neglected or exploited, including specific safeguarding issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs and indicators of different types of abuse, neglect and exploitation, including those which may occur online, and the importance of professional curiosity in identifying children who may need help or protection.
- Specific safeguarding issues including child-on-child abuse, domestic abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), financial exploitation, modern slavery and trafficking, serious violence, county lines, FGM, forced marriage and radicalisation.
- New and emerging safeguarding threats, including online harms and the ways in which technology, social media and artificial intelligence can facilitate or contribute to abuse, exploitation and other forms of harm.
- The importance of reassuring children who report abuse that they are being taken seriously and that they will be supported and kept safe.



- The fact that children can be at risk of harm inside and outside their home, inside and outside school, and online, and that safeguarding issues are rarely standalone events; children and families may experience multiple and overlapping needs.
- The fact that children may experience prejudice, discrimination or bullying because of their actual or perceived characteristics, and that this can create additional safeguarding needs or barriers to seeking help.
- The particular vulnerabilities and additional barriers that some children may experience, including children with SEND, children with medical conditions, young carers, children known to social care, looked-after and previously looked-after children, and children who are absent from education.
- The importance of information sharing in safeguarding children. Staff should understand that data protection legislation does not prevent the sharing of information for the purposes of keeping children safe and should follow the school's procedures for recording and sharing safeguarding information.
- What to look for to identify children who may need help, support or protection, including changes in behaviour or attendance, disclosures and online concerns.
- The importance of recording safeguarding concerns accurately, including the concern, action taken, decisions made, the rationale for those decisions and outcomes, in accordance with the school's safeguarding recording procedures.
- Their responsibility is to report any safeguarding concern or allegation about an adult working with children, including concerns which may appear low level, in accordance with the procedures set out in this policy.

Section 16 of this policy outlines in more detail how staff are supported to fulfil these responsibilities.

The DSL is a member of the senior leadership team. Our DSL is Fiona Williams. The DSL has the appropriate status, authority, skills and experience to carry out the duties of the role and takes lead responsibility for safeguarding and child protection in the school. This includes online safety and understanding the filtering and monitoring systems and processes in place on school devices and school networks to keep pupils safe online.

During term time, the DSL or a deputy will always be available during school hours for staff to discuss any safeguarding concerns. Whilst generally the DSL or a deputy will be available in person, where appropriate they may also be contacted by phone, email or MyConcern.

When the DSL is absent, the deputy DSLs – Liza Wayland-Edgson and Megan Collins – will act as cover. Deputy DSLs are trained to the same standard as the DSL.

The school will maintain robust and appropriate cover arrangements for occasions when the DSL is unavailable, including because of absence, illness or leave, and for out-of-hours and out-of-term activities. Where the DSL and deputy DSLs are not available, other appropriately trained, nominated safeguarding personnel will provide cover in accordance with the school's arrangements.

The activities of the DSL may be delegated to appropriately trained deputy DSLs. However, ultimate lead responsibility for safeguarding and child protection remains with the DSL and will not be delegated.

The DSL will be given the time, funding, training, resources and support necessary to carry out the role effectively. This includes:

- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children and work with other agencies as appropriate.
- Support staff in identifying children who may benefit from community-based early help, Family Help or other support, and contribute to multi-agency working where appropriate.



- Refer suspected cases, as appropriate, to the relevant body, including local authority children's social care, Prevent/Channel, the Disclosure and Barring Service (DBS) and/or the police, and support staff who make such referrals directly.
- Have a good understanding of child-on-child abuse, including harmful sexual behaviour, sexual violence and sexual harassment.
- Have a good understanding of online safety and the filtering and monitoring systems and processes in place at our school.
- Work with relevant staff, including IT staff and those with responsibility for filtering and monitoring, to ensure that safeguarding concerns identified through filtering and monitoring are responded to appropriately.
- Promote appropriate information sharing and ensure safeguarding information and records are managed, stored and transferred appropriately.

The DSL will also:

- Keep the headteacher informed of safeguarding issues as appropriate, particularly ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with local authority children's social care, the Local Authority Designated Officer (LADO) and other relevant agencies as appropriate.
- Act as a source of support, advice and expertise for all staff.
- Liaise with staff, including pastoral, SEND and mental health leads, where safeguarding concerns are linked to a child's learning, wellbeing, attendance or other needs.
- Understand the local safeguarding arrangements and know what specialist support is available for children and families and how to access it.
- Understand the local response to sexual violence, sexual harassment and harmful sexual behaviour and work with police, children's social care and other relevant agencies as appropriate.
- Ensure that appropriate support is considered for all children involved in incidents of child-on-child abuse, including the child who has experienced harm, the child alleged to have caused harm and any other children affected.
- Be aware of the requirement for children to have an appropriate adult to support them where required in connection with a police investigation or search.
- Help promote educational outcomes by sharing relevant information about the welfare, safeguarding and child protection issues experienced by children with appropriate staff, while maintaining necessary confidentiality.
- Maintain an understanding of relevant local and national safeguarding developments and ensure that the school's safeguarding practice reflects current statutory guidance.

The full responsibilities of the DSL and deputy DSLs are set out in their job descriptions and should be read alongside Keeping Children Safe in Education 2026.

The board of trustees will:

- Facilitate a **whole-school approach to safeguarding**, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensure that it complies with relevant legislation and statutory guidance, and hold the headteacher to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010, including the Public Sector Equality Duty, and the school's local multi-agency safeguarding arrangements.
- Appoint a senior board-level safeguarding link trustee to monitor the effectiveness of this policy in conjunction with the full board of trustees. This will be a different person from the DSL.



- Ensure that all staff receive appropriate safeguarding and child protection training, including online safety, at induction and that this training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure that the school has appropriate filtering and monitoring systems in place and that their effectiveness is reviewed at least annually. This includes:
 - Ensuring that the leadership team and relevant staff are aware of the filtering and monitoring arrangements in place and understand their roles and responsibilities.
 - Ensuring that the DfE's filtering and monitoring standards are reviewed and that school leaders, the DSL, IT staff and service providers work together to identify and address any actions required.
 - Ensuring that checks are made to confirm that filtering is working appropriately on relevant internet-connected devices and in relevant locations, and that these checks and the annual review are recorded.
 - Ensuring that the school considers the needs and risk profile of its pupils, including their age and any additional vulnerabilities, when determining the appropriateness of its filtering and monitoring arrangements.

Ensure that:

- The DSL has the appropriate status, authority, skills and experience, together with sufficient time, funding, training, resources and support to carry out the role effectively.
- Appropriate arrangements are in place to provide effective safeguarding cover when the DSL is unavailable.
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies and procedures.
- The DSL takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- The school has procedures to manage safeguarding concerns or allegations about staff, supply staff, trainee teachers, volunteers and contractors, including concerns that do not meet the harm threshold (low-level concerns). Appendix 2 of this policy sets out these procedures.
- The school has appropriate arrangements to respond to the additional safeguarding needs and barriers that may be experienced by some children, including children with SEND and children with medical conditions.
- Safeguarding arrangements take account of children who may be particularly vulnerable to harm, discrimination or exploitation and children who may face additional barriers to seeking or receiving help.
- Safeguarding information is appropriately shared, recorded and managed in accordance with statutory guidance and relevant data protection legislation.
- Ensure that where pupils are placed in **alternative provision or receive education away from the school site**, appropriate safeguarding arrangements are in place, and the school remains satisfied that the placement continues to meet the pupil's needs and that the pupil is safe.
- Where another body is providing services or activities on the school premises, regardless of whether or not the children attending those services or activities are on the school roll:
 - Seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place and inspect these where appropriate.
 - Ensure that arrangements are in place for the provider to liaise with the school about safeguarding matters where appropriate.
 - Ensure that safeguarding requirements are included as a condition of the use of school premises and that any agreement may be terminated if the provider fails to comply with those requirements.

The chair of trustees will act as the 'case manager' where an allegation is made against the headteacher, where appropriate, in accordance with the procedures set out in Appendix 2.

All trustees will receive appropriate safeguarding and child protection training at induction, which will be regularly updated, to enable them to provide appropriate strategic challenge and assurance that the school's safeguarding



policies and procedures are effective. Trustees will also ensure that they have an appropriate understanding of Keeping Children Safe in Education 2026 and their responsibilities under it.

Section 16 of this policy provides further information about how trustees are supported and trained to fulfil their safeguarding responsibilities.

The headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that all staff, including temporary and supply staff, trainee teachers and volunteers, as appropriate:
 - Are informed of the school systems which support safeguarding, including this policy, as part of their induction.
 - Receive appropriate safeguarding and child protection training, including online safety, during induction and regular updates thereafter.
 - Read and understand Part One of Keeping Children Safe in Education and understand their responsibilities under the school's safeguarding procedures.
 - Understand and follow the procedures included in this policy, particularly those concerning the identification, reporting and referral of concerns about children and concerns or allegations about adults working with children.
- Ensuring that safeguarding and child protection arrangements are implemented effectively across the school and that staff understand that safeguarding is everyone's responsibility and concerns must be acted upon without delay.
- Communicating this policy to parents and carers when their child joins the school and making it available through the school website.
- Ensuring that the DSL has the appropriate status and authority, together with sufficient time, funding, training, resources and support to carry out their role effectively.
- Ensuring that there are robust arrangements for safeguarding cover when the DSL is unavailable, including appropriate cover by trained deputy DSLs.
- Working with the DSL and board of trustees to ensure that appropriate safeguarding arrangements, including online safety and filtering and monitoring arrangements, are implemented effectively.
- Acting as the 'case manager' where an allegation that may meet the harm threshold is made against another member of staff or volunteer, where appropriate (see Appendix 2).
- Ensuring that allegations and concerns about adults working with children are managed in accordance with Keeping Children Safe in Education, local safeguarding procedures and this policy.
- Being the ultimate decision-maker in respect of all low-level concerns, while recognising that, depending on the nature of the concern and the role of the DSL, the headteacher may consult with the DSL and take a collaborative approach to decision-making.
- Ensuring that low-level concerns are recorded, reviewed and responded to appropriately, so that any patterns of inappropriate, problematic or concerning behaviour can be identified and appropriate action taken.
- Ensuring that the school promotes an open and transparent safeguarding culture in which staff feel able to raise concerns about safeguarding practice and the behaviour of adults working with children.

6. Confidentiality and information sharing

- Timely and effective information sharing is essential to safeguarding and promoting the welfare of children.
- Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.
- The Data Protection Act 2018 and UK GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. Data protection is not a barrier to safeguarding. Staff should share and record information when necessary to protect a child.



- From 30 September 2026, the school will comply with the statutory Information Sharing Duty under section 16LA of the Children Act 2004 and have regard to the statutory guidance on information sharing. Where the duty applies, relevant information must be shared where it may help another relevant person or organisation to safeguard or promote the welfare of a child.
- Where information is shared, staff should ensure that it is relevant, necessary and proportionate to the safeguarding purpose and should record information-sharing decisions appropriately.
- If staff need to share special category personal data, the Data Protection Act 2018 contains a safeguarding condition which can allow practitioners to share information without consent where the relevant legal requirements are met.
- Staff should be open and transparent with children and families about information sharing where it is safe and appropriate to do so. Consent is not always required to share information for safeguarding purposes, and staff should not seek consent where doing so could place a child at increased risk or undermine the prevention, detection or investigation of harm.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If a child asks the school not to share information about sexual violence or sexual harassment:
 - There is no definitive answer. Even if the child does not consent to information being shared, staff may still lawfully share it where there is another appropriate lawful basis under UK GDPR or where a statutory duty to share applies.
 - The DSL will balance the child's wishes against the school's duty to safeguard and protect the child and other children.
 - The DSL will consider that:
 - Parents or carers should normally be informed unless doing so would put the child at greater risk or otherwise not be in the child's best interests.
 - If a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to local authority's children's social care and, where appropriate, the police.
 - Where a report concerns a suspected criminal offence, the DSL will consider referral to the police in accordance with Keeping Children Safe in Education and the school's local safeguarding arrangements.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of children involved in a report of sexual violence or sexual harassment, including carefully considering which staff need to know about the report and the support required by the children involved.
- Consider the potential impact of social media, messaging services and other online platforms in facilitating the spread of rumours or information that may identify children involved.

Staff will follow the DfE's statutory information-sharing guidance and the school's local information-sharing procedures when making decisions about sharing safeguarding information.

Information sharing should be viewed as part of effective multi-agency safeguarding. Where appropriate, agencies should acknowledge information received and communicate relevant outcomes so that professionals understand what action has been taken.

If staff are in any doubt about sharing information, they should speak to the DSL or a deputy. However, staff should not delay sharing information that is necessary to safeguard a child.

Confidentiality is also addressed in this policy in relation to record-keeping in Section 15 and allegations and safeguarding concerns about staff in Appendix 2.



7. Recognising abuse, neglect and exploitation and taking action

All staff are expected to be able to identify and recognise signs and indicators of **abuse, neglect and exploitation, including online harms**, and to understand that safeguarding concerns may not always be obvious. Staff should maintain professional curiosity and be alerted to changes in a child's behaviour, attendance or presentation, disclosures and online concerns.

Any child may benefit from **help and support before statutory intervention**, including universal services, community-based early help or Family Help, where appropriate. Staff should be particularly alert to the potential need for additional help, support or protection for a child who:

- Has a disability or certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care (EHC) plan).
- Has a mental health need.
- Is a young carer.
- Is pregnant and/or is a parent themselves.
- Is bereaved.
- Has exhibited early signs of abusive, violent and/or harmful behaviours.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, organised crime groups, county lines and serious violence.
- Is frequently missing or goes missing from education, care or home.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Is viewing problematic and/or inappropriate online content or is developing inappropriate relationships online.
- Is in family circumstances presenting challenges for the child, such as drug or alcohol misuse, adult mental health needs, domestic abuse or significant parental conflict.
- Is misusing drugs or alcohol.
- Has returned home to their family from care.
- Is at risk of so-called 'honour'-based abuse, including female genital mutilation (FGM) or forced marriage.
- Is a privately fostered child.
- Has a parent or carer in custody or is affected by parental offending.
- Is missing education, persistently absent from school or not in receipt of full-time education.
- Has experienced multiple suspensions or is at risk of, or has been, permanently excluded.

Staff should recognise that **children may experience more than one form of harm or need at the same time**, and that these may be connected. Concerns should therefore be considered in the context of the child's wider



circumstances and family, while maintaining a child-centred approach. *Working Together 2026* specifically reinforces that children can experience multiple harms simultaneously.

Staff, volunteers and trustees must follow the procedures set out below where they have a safeguarding concern. **Staff must act immediately on any concern and must not delay appropriate action.** Concerns should be reported to the DSL or a deputy without delay in accordance with this policy. Where a child is in immediate danger, appropriate emergency action should be taken.

Please note in this and subsequent sections, references to the DSL should be read as **'the DSL (or a deputy DSL)'**, unless the context specifically requires action by the DSL.

7.1 If a child is suffering or likely to suffer significant harm, or is in immediate danger

Make a referral to **local authority children's social care immediately** if you believe that a child is suffering, or is likely to suffer, significant harm.

If a child is in **immediate danger**, or a crime has been committed or may be committed, contact the **police as appropriate**.

Anyone can make a referral. Staff should not delay making a referral because the DSL or a deputy is unavailable. A Family Help or other early help assessment is **not a prerequisite for making a referral** to local authority children's social care.

Tell the DSL (see Section 5) as soon as possible if you make a referral directly.

When making a referral, staff should share all relevant information they hold that may assist local authority children's social care in assessing the child's needs and circumstances.

Local authority children's social care should acknowledge the referral and decide on the next course of action **within one working day**. If the referrer does not receive this information, they should follow this up. If staff remain concerned about the response, they should discuss this with the DSL and follow the school's local escalation procedures.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- **Listen carefully and take what they say seriously.** Allow them time to talk freely and respond with empathy. Recognise the significance of the child choosing you as someone they trust.
- Stay calm and do not show shock, disbelief or judgement.
- Reassure the child that they have done the right thing by telling you. Do not tell them that they should have told someone sooner.
- **Do not investigate or ask leading questions.** Where it is necessary to clarify what the child is telling you, use open-ended questions and the child's own language.
- Explain what will happen next and that you will need to pass the information on to people who can help keep them safe. **Do not promise confidentiality or agree to keep the information secret.**
- Listen to the child without making assumptions. Be aware that an initial disclosure may not contain the full details of what has happened and that a child may disclose information gradually.



- Make an accurate written record as soon as possible. Wherever possible, give the child your full attention during the conversation and make the detailed record afterwards.
- Record the child's account **in their own words wherever possible**, distinguishing clearly between fact, observation and professional opinion. Do not add your own judgement or interpretation.
- Record the date and time of the disclosure and your record and pass the concern to the DSL as soon as possible in accordance with the school's safeguarding recording procedures.
- Alternatively, where appropriate, make a referral directly to local authority children's social care and/or the police (see Section 7.1) and tell the DSL as soon as possible that you have done so.
- Share the information only with those who need to know in order to safeguard the child and progress the concern, in accordance with Section 6 of this policy.

Staff should bear in mind that some children may:

- Not feel ready, or know how, to tell someone that they are being abused, neglected or exploited.
- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated, frightened or threatened.
- Communicate their experiences in ways other than through a direct verbal disclosure.
- Face additional barriers to telling someone because of their age, vulnerability, disability, communication needs, sex, ethnicity, sexual orientation, language or other individual circumstances.

None of this should prevent staff from maintaining professional curiosity and speaking to the DSL if they have concerns about a child. Staff should not wait for a child to make a disclosure before acting on a safeguarding concern.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Female genital mutilation (FGM) comprises procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and is a form of child abuse with long-lasting harmful consequences.

Possible indicators that a pupil may have been subjected to FGM, and factors that may suggest a pupil is at risk of FGM, are set out in Appendix 1 of this policy.

Whilst all staff should speak to the DSL (or a deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers.

Any teacher who, in the course of their professional duties:

- Is informed by a girl under the age of 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under the age of 18 and has no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth,

must personally report this to the police. This is a mandatory statutory duty and responsibility for making the report cannot be transferred to the DSL. A teacher who fails to comply with the duty may face disciplinary sanctions.



Unless the teacher has good reason not to, they should also discuss the case with the DSL (or a deputy), who will involve local authority's children's social care as appropriate.

It will be rare for teachers to see physical evidence of FGM and **staff must not examine pupils for the purpose of determining whether FGM has taken place.**

Any other member of staff who is informed that FGM has been carried out, or who has concerns that FGM may have been carried out, must speak to the DSL (or a deputy) without delay and follow the school's local safeguarding procedures.

The mandatory reporting duty for teachers applies to **known cases of FGM in girls under 18**. It does not apply where a child is considered to be at risk of FGM, or where FGM is suspected but has not been disclosed or visually identified. In these circumstances, staff must speak to the DSL (or a deputy) without delay and follow local safeguarding procedures, including referral to local authority children's social care and/or the police where appropriate.

Where there is an **immediate risk to life or likelihood of serious immediate harm, the police should be contacted immediately**, including by calling 999 where appropriate.

7.4 If you have concerns about a child

Figure 1 below, before Section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Staff should act immediately on any safeguarding concern. Where possible, speak to the DSL (or a deputy) first to agree a course of action.

If, in exceptional circumstances, the DSL or a deputy is not available, this **must not delay appropriate action being taken**. Speak to a member of the senior leadership team and/or seek advice from the local authority children's social care. You can also seek advice at any time from the NSPCC helpline on **0808 800 5000**.

Share details of any action you take with the DSL as soon as practically possible.

Depending on the circumstances and level of need, the appropriate action may include:

- Providing support through the school's own pastoral or safeguarding arrangements.
- Considering whether the child and family may benefit from **community-based early help or Family Help**.
- Working with other professionals and agencies to support the child and family.
- Making a referral to the local authority children's social care where appropriate (see '**Referral**' below).
- Contacting the police where appropriate.

Anyone can make a referral to the local authority children's social care. Staff should make a referral directly where this is appropriate and should not delay doing so because the DSL is unavailable. Any action taken should be shared with the DSL as soon as possible.

Staff should continue to support and monitor the child as appropriate following any action or referral. If concerns remain, or the child's circumstances do not appear to be improving, staff should speak to the DSL and consideration should be given to further action or escalation.



Community-based Early Help and Family Help assessment

If a **community-based Early Help assessment** is appropriate, the DSL (or a deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the **lead practitioner**.

Where a child or family requires more targeted or co-ordinated support, the school will work with the local authority children's services and other relevant agencies in accordance with local **Family Help arrangements**. Family Help brings together targeted early help and support for children in need under section 17 of the Children Act 1989, providing a more seamless offer of support to children and families.

The school will work within the locally agreed arrangements, protocols and levels of need for assessment and support established by the safeguarding partners and relevant agencies.

The DSL will ensure that cases involving the school are **kept under regular review** and that the impact of support and interventions is considered. If the child's situation does not appear to be improving, is getting worse, or new safeguarding concerns arise, consideration will be given to a referral to the local authority children's social care for assessment for statutory services. **Support through community-based Early Help or Family Help must not delay a referral where a child is suffering, or is likely to suffer, significant harm.**

Timelines for interventions, actions and outcomes will be monitored and reviewed, and relevant information will be shared with other professionals in accordance with Section 6 of this policy.

Referral

If it is appropriate to refer the case to the local authority children's social care or the police, the DSL will make the referral or support you to do so.

Anyone can make a referral. If you make a referral directly (see Section 7.1), you must tell the DSL as soon as possible. The absence of the DSL or a deputy must not delay an appropriate referral.

When making a referral to the local authority children's social care, all relevant information should be shared to support an assessment of the child's needs and circumstances. Where a **Family Help assessment** has already been undertaken, relevant information from this should support the referral. A Family Help assessment is **not a prerequisite for making a referral**.

The local authority children's social care should acknowledge receipt of the referral and, **within one working day**, a social-work-qualified practice supervisor or manager should decide on the next course of action. The referrer should be informed of the decision, including where no further action is to be taken by the local authority children's social care and, where appropriate, the reasons for that decision.

The DSL or person who made the referral must follow up with the local authority children's social care if this information is not received and ensure that the referral, actions taken, decisions, rationale and outcomes are appropriately recorded.

If the child's situation does not appear to be improving following the referral, or if the DSL or person who made the referral is not satisfied with the response, they must follow the **local escalation procedures** to ensure that their concerns have been addressed and that appropriate action is taken to safeguard the child.

7.5 If you have concerns about extremism or radicalisation

The school is subject to the **Prevent duty under section 26 of the Counterterrorism and Security Act 2015**. As part of its safeguarding responsibilities, the school will have due regard to the need to help prevent the risk of



children becoming terrorists or supporting terrorism. This includes safeguarding children from extremist ideologies and radicalisation.

If you have concerns that a child may be **susceptible to radicalisation into terrorism**, where possible speak to the DSL (or a deputy) first to agree a course of action.

If, in exceptional circumstances, the DSL or a deputy is not available, this must not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from the local authority Prevent lead, police or the local authority children's social care, as appropriate.

Make a referral to the local authority children's social care directly if appropriate (see '**Referral**' above). Inform the DSL or a deputy as soon as practically possible after making a referral.

Where there is a concern about potential radicalisation, the DSL will consider the level and nature of the risk and determine the appropriate course of action. This may include seeking advice from the **local authority Prevent lead or police and/or making a Prevent referral**. The school will follow the local Prevent referral process and use the national Prevent referral form where appropriate.

A Prevent referral should be considered where there is concern that a child may be susceptible to radicalisation and may be on a pathway that could lead to terrorism. There is **no single profile of a person who may be susceptible to radicalisation**, and staff should use professional curiosity and judgement rather than relying on stereotypes or assumptions. Where staff are unsure whether a concern meets the threshold for a Prevent referral, advice should be sought from the DSL, the local authority Prevent lead or the police.

Prevent is a safeguarding programme which aims to intervene early and support people who may be susceptible to radicalisation into terrorism. Following a Prevent referral, the police will assess the concern and determine whether the child may be appropriate for consideration by **Channel**. Channel is a multi-agency programme which provides support to people who are susceptible to becoming involved in terrorism or supporting terrorism. Channel support is voluntary.

Concerns about radicalisation may exist alongside other safeguarding concerns. **Prevent can operate alongside other safeguarding processes**, and a Prevent referral does not replace a referral to the local authority children's social care or the police where these are also required.

Where there is an **immediate risk of harm or an immediate terrorist threat, call 999**. Concerns about possible terrorist activity can also be reported to the police through the appropriate counter-terrorism reporting arrangements.

The school will ensure that relevant staff receive appropriate **Prevent training** and understand the risks of radicalisation, including online, the school's internal reporting procedures and how to raise a Prevent concern. The school will also maintain an appropriate Prevent risk assessment and action plan, informed by the local threat and risk.

7.6 If you have a concern about mental health

Schools have an important role to play in supporting the mental health and wellbeing of pupils.

Mental health problems can, in some cases, **develop into safeguarding concerns**. They can also be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff are not expected to diagnose or treat mental health problems. However, staff are well placed to observe children day-to-day and will be alerted to changes in behaviour, attendance, presentation or wellbeing which may suggest that a child is experiencing a mental health problem or is at risk of developing one.



Staff have an important role in:

- Promoting positive mental health and wellbeing and helping to prevent mental health difficulties.
- Identifying children who may be experiencing mental health problems or who may be at risk of developing them.
- Providing appropriate support within the school and helping children to access additional or specialist support where required.
- Recognising where a mental health concern may also indicate a safeguarding concern and taking appropriate action.

If you have a mental health concern about a child that is **also a safeguarding concern**, take immediate action by following the procedures in Section 7.4 and speak to the DSL (or a deputy) without delay.

If you have a mental health concern that is **not considered to be a safeguarding concern**, follow the school's pastoral and mental health support procedures and speak to the appropriate member of staff. The DSL should be consulted where there is any uncertainty about whether the concern may have safeguarding implications.

Staff should remember that mental health and safeguarding concerns can overlap and circumstances can change. Where concerns increase, the child's circumstances do not improve, or further safeguarding information becomes known, the concern should be reconsidered and escalated as appropriate.

7.7 Concerns or allegations about a staff member, supply teacher, trainee teacher, volunteer or contractor

If you have a safeguarding concern about a member of staff, including a **supply teacher, trainee teacher, volunteer or contractor**, or an allegation is made that they may pose a risk of harm to children, you must speak to the **headteacher as soon as possible**.

If the concern or allegation is about the headteacher, you must speak to the **chair of trustees**.

The headteacher or chair of trustees, as appropriate, will then follow the procedures set out in Appendix 2 and **Part Four of Keeping Children Safe in Education 2026**.

Concerns and allegations will be considered according to whether they:

- **May meet the harm threshold**; or
- **Do not meet the harm threshold**, in which case they will be dealt with in accordance with the school's low-level concerns procedure.

Where a concern or allegation may meet the harm threshold, the headteacher or chair of trustees, as appropriate, will liaise with the **Local Authority Designated Officer (LADO)** in accordance with local safeguarding procedures.

Where you believe there is a **conflict of interest** in reporting a concern or allegation about a member of staff, supply teacher, trainee teacher, volunteer or contractor to the headteacher, you should report it directly to the LADO.

If you receive an allegation relating to an individual or organisation using the school premises to provide an activity or service for children, you must follow the school's safeguarding policies and procedures and **inform the LADO in the same way as with any safeguarding allegation that may meet the harm threshold**.



All concerns about adults working with children, **including those which may appear low level**, must be reported in accordance with the procedures set out in this policy and Appendix 2. Staff should not determine for themselves whether a concern is sufficiently serious to report.

7.8 Allegations of abuse made against other pupils (child-on-child abuse)

We recognise that children are capable of abusing other children. This is referred to as **child-on-child abuse** and can take place inside or outside school and online.

Abuse will never be tolerated or passed off as **“banter”, “just having a laugh”, “part of growing up” or “boys being boys”**, as doing so can lead to a culture of unacceptable behaviour, an unsafe environment for pupils and, in the most serious circumstances, a culture in which abuse is normalised.

All child-on-child abuse is unacceptable and will be taken seriously. The school maintains an attitude of **“it could happen here”**, even where there are no reported cases.

Staff will recognise that child-on-child abuse can take many forms and may include:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- Abuse in intimate personal relationships between children.
- Physical abuse.
- Sexual violence, sexual harassment and **harmful sexual behaviour (HSB)**.
- Causing or pressuring another child to engage in harmful or inappropriate behaviour.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos, including digitally manipulated or AI-generated imagery.
- Upskirting.
- Initiation or hazing-type behaviour.
- Abuse facilitated through technology, including online harassment, coercion, threats and image-based abuse.

Most incidents of inappropriate behaviour between pupils will be dealt with under the school’s Behaviour Policy. However, this Child Protection and Safeguarding Policy will apply where behaviour raises a safeguarding concern. **Behaviour may be both a behaviour concern and a safeguarding concern, and the use of the Behaviour Policy will not prevent appropriate safeguarding action being taken.**

This may include where the alleged behaviour:

- Is serious or potentially a criminal offence.
- Could place another child or children at risk of harm.
- Is violent, abusive, coercive or threatening.
- Involves exploitation or an imbalance of power.
- Involves children being pressured or forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse, sexual harassment, sexual violence or harmful sexual behaviour.



- Involves the sharing or creation of inappropriate sexual imagery, including nude or semi-nude images and digitally manipulated or AI-generated imagery.
- Is persistent or escalating, or forms part of a pattern of concerning behaviour.
- Occurs online or outside school but has safeguarding implications for a child or children at Penryn College.

Where an allegation of child-on-child abuse is made, staff will **report it to the DSL (or a deputy) without delay** and record the concern in accordance with the school's safeguarding procedures. The DSL will consider the needs and safety of **all children involved**, including the child who has experienced harm, the child alleged to have caused harm and any other children who may have been affected.

The school will consider appropriate support, safeguarding arrangements and risk management for all children involved. Where appropriate, this may include referral to the local authority children's social care, the police or other specialist services.

Children who report abuse will be reassured that **they are being taken seriously and will be supported and kept safe**. They will not be made to feel that they are creating a problem by making a report.

The school recognises that a child displaying harmful behaviour **may themselves have additional needs or have experienced abuse, neglect, exploitation or other harm**. This will be considered as part of the safeguarding response without minimising the impact of their behaviour on other children.

The school will also be alert to **patterns of behaviour and wider safeguarding issues**, including whether there are particular locations, groups of pupils, times of day, online environments or aspects of the school culture that may be contributing to incidents.

Further information about recognising and responding to child-on-child abuse, including harmful sexual behaviour, sexual harassment and sexual violence, is set out in the school's **Child-on-Child Abuse Policy** and relevant appendices to this policy.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must **listen carefully, take the report seriously, record the allegation and tell the DSL (or a deputy) without delay, but do not investigate it**.
- The DSL will consider the nature and seriousness of the allegation, the needs and wishes of the children involved and whether the matter can be managed internally or requires **Community-based Early Help, Family Help, the local authority children's social care and/or the police**.
- Where there is reason to believe that a child is suffering, or is likely to suffer, significant harm, a referral will be made to the local authority children's social care. Where the allegation may involve a criminal offence, the DSL will consider reporting the matter to the police in accordance with KCSIE and local safeguarding arrangements.
- Where appropriate, the DSL will put a **risk and needs assessment and support plan** in place for all children involved, including the child or children who have experienced harm, the child or children alleged to have caused harm, and any other children affected. Each child will have a named person they can talk to if needed. This will include considering potentially vulnerable places and situations, including classrooms, unstructured times and **school transport**.
- The risk and needs assessment will be kept under review and updated where circumstances change.



- The DSL will consider whether referral to **mental health or other specialist services** is appropriate for any of the children involved.

Where an incident may constitute a criminal offence and there are delays in the criminal process, the DSL will work closely with the police and other agencies as required while continuing to safeguard and support the children involved and considering any appropriate action under the school's Behaviour Policy. The school will ensure that any action it takes does not jeopardise a police investigation and will seek advice from the police where necessary.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse and of creating a supportive environment where children feel safe and confident to report concerns.

To achieve this, we will:

- Challenge derogatory, discriminatory, abusive or sexualised language and inappropriate behaviour between pupils, including inappropriate online behaviour and the requesting, creating or sharing of sexual images.
- Challenge sexism, misogyny and misandry, racism, homophobia, biphobia, transphobia and other forms of prejudice, discrimination and harassment.
- Recognise that child-on-child abuse can affect any child and avoid making assumptions based on sex, gender, sexuality, disability, ethnicity or other characteristics.
- Ensure our curriculum, including RSHE, helps pupils understand **healthy relationships and friendships, appropriate behaviour, boundaries, consent, equality, respect, online safety and how to seek help**.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in Section 7.10 below).
- Ensure staff reassure children who report abuse that **they are being taken seriously and will be supported and kept safe**.
- Be alert to patterns of child-on-child abuse, sexual violence, sexual harassment and harmful sexual behaviour that may indicate environmental or systemic issues which should be addressed through changes to policies, processes, supervision, the physical environment or curriculum, or which may reflect wider issues in the local area that should be shared with safeguarding partners.
- Provide appropriate safeguarding and support for children who have experienced harm, children alleged to have caused harm and other children who have witnessed or been affected by an incident. The school will take appropriate steps to prevent bullying, harassment or retaliation, including online.
- Consider intra-familial harm and any necessary safeguarding or support for siblings and other children following a report.
- Consider the role that social media, messaging and other online platforms may play before, during and following an incident, including contact between the children involved and their peers.

Staff will be trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, including harmful sexual behaviour, and how to respond to concerns and reports.
- That child-on-child abuse can happen **inside or outside school and online**.



- That even where there are no reported cases, this does not mean abuse is not happening; staff should maintain an attitude of **"it could happen here"**.
- That if they have concerns about a child's welfare they should act immediately rather than wait to be told, and that children may not always make a direct disclosure.
- That children may communicate concerns through changes in behaviour, attendance, presentation or wellbeing; a friend or another person may raise a concern; or staff may see, hear or become aware of information that causes concern.
- That some children may face additional barriers to reporting abuse, including because of age, vulnerability, disability, communication needs, sex, ethnicity, sexual orientation or other circumstances.
- That a child displaying abusive or harmful behaviour may themselves have safeguarding needs or have experienced abuse, neglect, exploitation or other harm.
- The important role staff have in **preventing, identifying and responding to child-on-child abuse**.
- That concerns should be reported to the DSL (or a deputy) without delay.
- That social media and other online communication are likely to play a role in the impact of an incident or alleged incident, including potential contact between the children involved and their friends.

Safeguarding, support and disciplinary action

The DSL will take the lead on the **safeguarding response** to an allegation of child-on-child abuse, working with the headteacher and other relevant staff in relation to any action under the school's Behaviour Policy. Appropriate support will be provided alongside any disciplinary action.

Disciplinary action may be considered while an investigation by the police or another agency is ongoing. The fact that another agency is investigating, or has investigated, an incident does not in itself prevent the school from considering the matter under its own policies.

Any decision will be made on a **case-by-case basis**, taking into account the individual circumstances and the need to safeguard all children involved. In particular, the school will consider whether:

- Taking action could prejudice a police investigation or subsequent prosecution. The school will liaise with the police and/or the local authority children's social care where appropriate.
- There are circumstances which make it unreasonable for the school to reach its own conclusions while an independent investigation is ongoing.
- Any action is **reasonable and proportionate**, taking account of the behaviour, the circumstances of the children involved and their safeguarding and support needs.

7.9 Sharing of nudes and semi-nudes / self-generated intimate imagery

For the purposes of this policy, this includes the consensual and non-consensual creation or sharing of nude or semi-nude images, videos or live streams involving children under the age of 18, including **self-generated intimate imagery and imagery created or manipulated using AI or other technology, such as deepfakes**.

The school will respond to incidents in accordance with *Keeping Children Safe in Education 2026* and the UK Council for Internet Safety (UKCIS) guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people*.



Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images, videos or other intimate imagery involving a child, including **AI-generated or digitally manipulated imagery**, you must report it to the DSL (or a deputy) **immediately**.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery accidentally, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) involved to disclose detailed information regarding the imagery. This is the responsibility of the DSL.
- Share information about the incident with other members of staff, the pupils involved, or their or other parents and/or carers, unless directed to do so as part of the safeguarding response.
- Say or do anything which could blame or shame any child involved.

You should explain that you need to report the incident and reassure the pupil that **they have done the right thing by speaking to you and that they will receive support and help**.

These instructions reflect the current UKCIS staff guidance, including the important rule that staff should not view the imagery themselves.

Initial review

Following a report of an incident, the DSL will hold an initial review with appropriate school staff. This may include the member of staff who received the disclosure and members of the safeguarding or leadership team.

The initial review will consider:

- Whether there is an immediate risk of harm to any pupil.
- Whether the incident involves another child or **an adult, or a person believed to be an adult**.
- Whether there are indications of coercion, pressure, grooming, exploitation, threats, blackmail or **financially motivated coercion**.
- Whether a referral should be made to the police and/or local authority children's social care.
- Whether it is necessary for the DSL to view the imagery in order to safeguard a child. **In most circumstances the imagery should not be viewed**.
- What further information is required to determine the most appropriate and proportionate response.
- Whether the imagery has been shared more widely and, where known, through which services, platforms or devices.
- What action may be required to report, remove or prevent further sharing of the imagery.
- Relevant information about the children involved which may influence the risk and needs assessment, including age, developmental stage, SEND or other vulnerabilities.
- Whether another school, college, setting or agency needs to be contacted.



- Whether parents or carers should be informed. **In most cases parents/carers should be involved**, unless there is good reason to believe that doing so would place a child at additional risk.
- What immediate and ongoing safeguarding and support is required for all children involved.

The DSL's response will be guided by the **welfare and protection of the children involved, professional judgement and the principle of proportionality**.

Referral to other agencies

The DSL will make or consider an immediate referral to the **police and/or the local authority children's social care**, as appropriate, where:

- The incident involves an adult. Where an adult has presented themselves as a child in order to groom, exploit, coerce or abuse a child, the incident may initially appear to be child-on-child.
- There is reason to believe that a child has been coerced, pressured, threatened, blackmailed, groomed or exploited, including where there may be **financially motivated coercion or extortion**.
- There are concerns about a child's ability to understand or freely consent to what has happened, including because of age, developmental stage, SEND or another vulnerability.
- The information available indicates behaviour or content which raises significant safeguarding concerns.
- A child is believed to be at **immediate risk of harm** as a result of the creation or sharing of the imagery.
- There are other circumstances in which referral is necessary to safeguard a child.

Where an **adult is involved in sharing imagery of a child**, this must not be treated as an ordinary child-on-child image-sharing incident. Current UKCIS guidance identifies this as child sexual abuse and states that it should be referred to the police urgently.

If the above factors do not apply, the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide that the incident can be managed within the school's safeguarding procedures without referral to the police or the local authority children's social care. The decision, **reasons for the decision, action taken and outcomes** will be recorded in accordance with this policy.

Any decision to manage an incident within school will not prevent a later referral if further information becomes known or the level of safeguarding concern increases.

Further review by the DSL

If, at the initial review stage, a decision has been made not to refer the incident to the police and/or the local authority children's social care, the DSL will conduct a further review to **establish the facts and assess the risks and needs of the children involved**.

The DSL will speak with the pupils involved, where appropriate. Discussions will be conducted sensitively and in accordance with the school's safeguarding procedures. The DSL will consider the circumstances of the incident, including whether there has been any pressure, coercion, exploitation, grooming, threats or other abusive or aggravating factors; whether imagery has been shared more widely; and the age, developmental stage and vulnerabilities of the children involved.

The DSL will keep the decision not to refer under review. A disclosure may develop over time and further information may become known, meaning that **more than one review or risk and needs assessment may be required**.



If at any point in the process there is a concern that a pupil has been harmed, is at risk of harm, or new information indicates that referral is required, a referral will be made to local authority children's social care and/or the police **without delay**, as appropriate.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them appropriately involved in the process, unless there is good reason to believe that involving them would put the pupil at risk of harm.

Where appropriate, the pupil will be supported to consider **how their parents/carers are informed and whether they wish to be involved in that conversation**.

Where there are safeguarding concerns about informing parents/carers, the DSL will seek advice from the local authority children's social care and/or the police as appropriate. Any decision not to inform parents/carers, and the reasons for that decision, will be recorded.

Referring to the police

Where it is necessary to refer an incident to the police, the DSL will use the **appropriate local safeguarding and police referral arrangements**. This may include the local multi-agency safeguarding arrangements, police safeguarding team, safer schools/neighbourhood policing arrangements, **101**, or **999 where there is an immediate threat to life or safety**.

The DSL will work with the police and other relevant agencies and will ensure that the school's actions do not prejudice any police investigation.

Recording incidents

All incidents involving the sharing, creation or manipulation of nudes and semi-nudes, including **AI-generated or digitally manipulated imagery**, and the decisions made in responding to them will be recorded.

Records will include, as appropriate, the concern reported; relevant information gathered; risk and needs assessments; actions taken; decisions made and the rationale for them; referrals or advice sought; parental involvement; support provided; and outcomes.

Where a decision is made **not to refer the incident to the police or the local authority children's social care, the reasons for this decision will be recorded and appropriately authorised in accordance with the school's safeguarding procedures**. The decision will remain subject to review if further information becomes available.

Copies of the imagery must not be taken or retained as part of the safeguarding record.

The record-keeping arrangements set out in **Section 15** of this policy also apply to these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the creation and sharing of **nudes and semi-nudes and self-generated intimate imagery, including AI-generated or digitally manipulated imagery**, as part of our **Relationships, Sex and Health Education (RSHE), online safety and Computing curriculum**. Teaching will be age and developmentally appropriate and will reflect the needs and experiences of pupils.

Teaching covers the following in relation to the creation and sharing of nudes and semi-nudes and other intimate imagery:

- What it is, including **AI-generated and digitally manipulated imagery such as deepfakes**.



- How it is most likely to be encountered, including through social media, messaging, gaming and other online platforms.
- The importance of **consent, healthy relationships, boundaries, respect and privacy**, including recognising pressure, coercion, grooming, manipulation and exploitation.
- The consequences of requesting, creating, generating, forwarding or providing such images, including when behaviour may be abusive or constitute **online sexual harassment or online sexual abuse**.
- Relevant **legal issues**, including the law relating to creating, generating, possessing and sharing sexual imagery involving children and the non-consensual sharing of intimate imagery.
- The risks and potential impact on a child's **wellbeing, privacy, safety and reputation**.
- How technology, including **AI and deepfake technology**, can be used to create or manipulate imagery without a person's consent.
- The risks associated with **blackmail, coercion and financially motivated sexual extortion**.
- How to report concerns and seek help, including the importance of speaking to a trusted adult and understanding that pupils **will be supported when they ask for help**.

Pupils also learn the strategies and skills needed to manage:

- Specific requests, pressure or coercion to create, provide or forward such images.
- The receipt of such images, including **not forwarding or sharing them further and seeking help from a trusted adult**.
- Situations where imagery has been created, manipulated or shared without their consent.
- Concerns about their own behaviour or the behaviour of another person online.
- How and where to seek help and report concerns.

The school will ensure that pupils understand that **responsibility lies with the person who abuses, coerces, exploits or shares imagery without consent**, and that a child who seeks help will be listened to, taken seriously and supported.

This policy and the school's procedures relating to the sharing of nudes and semi-nudes and self-generated intimate imagery will be communicated to pupils in an **age and developmentally appropriate way**, so that they understand how to report a concern and what they can expect the school to do if an incident occurs.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first.
- Approaching issues from the perspective and lived experiences of children.
- Providing **accurate, age and developmentally appropriate information**.
- Promoting dialogue, critical thinking and understanding.
- Empowering and enabling children and young people to recognise unsafe situations, make informed decisions and seek help.
- Teaching about healthy relationships, consent, respect, equality and appropriate online behaviour.
- Ensuring teaching is accessible to pupils with **SEND and other additional needs**.



- Avoiding frightening, alarmist or scare-based approaches.
- **Challenging victim-blaming**, harmful stereotypes, misogyny and other discriminatory attitudes.
- Ensuring pupils know where and how to access support.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's **wishes and feelings into account** when determining what action to take and what services or support to provide, while recognising that the school may need to take action to safeguard the child or others.

We recognise the importance of ensuring pupils feel **safe and comfortable to come forward and report concerns and/or allegations**, and that they understand how and where they can seek help.

We recognise that children may not always feel ready or know how to tell someone that they are being harmed. They may not recognise their experiences as harmful, or may feel embarrassed, frightened or worried about what will happen if they report. Some pupils may face additional barriers to reporting because of their age, disability, SEND, communication needs, language, vulnerability or other circumstances.

To achieve this, we will:

- Put **clear, accessible and age-appropriate systems** in place for pupils to report abuse, safeguarding concerns or worries.
- Ensure pupils have **different ways of reporting concerns**, including opportunities to speak directly to a trusted member of staff.
- Ensure our reporting systems are **well promoted, easily understood and easily accessible** to all pupils, including those with SEND, communication needs or English as an additional language.
- Ensure pupils know **who they can speak to in school**, including their tutor, teachers, Heads of Year, Inclusion/EST staff and the Safeguarding Team.
- Make it clear to pupils that their concerns will be **taken seriously**, that they will be listened to and supported, and that they can safely express their views and give feedback.
- Reassure pupils that they will **not be made to feel that they are creating a problem by reporting abuse or neglect**.
- Explain, in an age and developmentally appropriate way, **what will happen after they make a report**, including that information may need to be shared with other people in order to keep them or another child safe.
- Ensure pupils know that they can report concerns about **anything that happens inside or outside school, including online**.
- Ensure pupils know they can report concerns about the behaviour of **another pupil or an adult**, including a member of staff.
- Encourage pupils to report concerns about a friend or another child where they are worried about their safety or wellbeing.
- Regularly seek pupils' views about whether they **feel safe, know how to report concerns and have confidence in the school's reporting systems**, and use this feedback to inform safeguarding practice.



Staff will remain professionally curious and will not rely solely on pupils making a direct disclosure. Staff will be alerted to changes in behaviour, attendance, presentation, relationships or wellbeing, or information from friends, family members or others, which may indicate that a child requires help or protection.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology, including generative artificial intelligence (AI), is a significant and evolving component of many safeguarding and wellbeing issues.

Online safety is an integral part of the school's safeguarding arrangements and is considered as part of our whole-school approach to safeguarding, curriculum, staff training, policies and procedures, and filtering and monitoring arrangements.

To address this, our school aims to:

- Have robust processes, including appropriate filtering and monitoring systems, in place to support the online safety of pupils, staff, volunteers and trustees.
- Protect and educate the whole school community in the safe, responsible and appropriate use of technology, including mobile and smart technology, social media and generative AI.
- Set clear guidelines for the use of mobile phones, smart devices and school technology for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate incidents or concerns, where appropriate.
- Ensure pupils understand how to recognise online risks, make safe and informed choices and report concerns or seek help.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm and suicide content, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news), conspiracy theories, and **AI-generated or manipulated content such as deepfakes**.

Contact – being subjected to harmful online interaction with other users or **generative AI applications that simulate human interaction**, such as peer-to-peer pressure, inappropriate commercial contact, and adults posing as children or young adults with the intention of grooming or exploiting them for sexual, criminal, financial or other purposes.

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as bullying or harassment; making, requesting, sending or receiving sexual imagery, including consensual and non-consensual sharing of nudes and semi-nudes and **AI-generated or digitally manipulated intimate imagery**; or other harmful online behaviour.

Commerce – risks arising from online commercial activity, including inappropriate advertising, phishing, financial scams and other forms of financial exploitation.



We will educate pupils about online safety through our curriculum, including **RSHE and Computing**. This will include, as appropriate:

- The safe, responsible and respectful use of social media, the internet, technology and generative AI.
- Keeping personal information private and understanding privacy and location settings.
- Understanding that online content may be false, misleading, manipulated or generated using AI.
- Developing critical thinking and digital resilience, including recognising misinformation, disinformation, deepfakes and harmful or discriminatory content.
- Understanding healthy and respectful online relationships, boundaries and consent.
- Recognising unacceptable, abusive, exploitative or harmful behaviour online.
- Understanding the risks associated with sharing images and information online.
- Knowing how to report online safeguarding concerns, cyberbullying and other harmful behaviour, including where a pupil is a witness rather than the person directly affected.
- Knowing where and how to seek help.

The revised statutory RSHE guidance, in force from **1 September 2026**, strengthens teaching around online safety, AI-created material, misinformation and disinformation, privacy and the characteristics of social media.

Staff will receive training as part of their induction on safe internet use and online safeguarding issues, including online child-on-child abuse, cyberbullying, online radicalisation, emerging technology and AI risks, and the **expectations, roles and responsibilities relating to filtering and monitoring**. All staff will receive appropriate updates and refresher training, including at least annually.

Staff will be made aware of any restrictions relating to their use of personal mobile phones, smart devices and cameras. In particular:

- Staff may bring personal phones to school for their own use but must follow the school's Staff Code of Conduct and relevant policies regarding their use while responsible for pupils.
- Staff must not use personal devices to take photographs or recordings of pupils except where expressly authorised under an approved school procedure.

The school will ensure pupils, parents/carers, staff, volunteers and trustees are aware of the school's expectations regarding the acceptable use of school IT systems, internet access and mobile and smart technology. Appropriate acceptable-use agreements will be used in accordance with the school's policies.

Pupils will be made aware of the consequences and sanctions that may apply where they breach the school's policies relating to acceptable use of technology, online behaviour or mobile phones. **Safeguarding concerns will be responded to as safeguarding matters and will not be treated solely as behaviour or disciplinary issues.**

Where searching, screening or confiscation is considered necessary, staff will act in accordance with the DfE's statutory guidance and the school's relevant policies and procedures.

Filtering and monitoring

The school will have appropriate filtering and monitoring systems in place to limit pupils' exposure to illegal, inappropriate and harmful online material through school systems and devices, while ensuring that filtering does not unreasonably restrict teaching and learning.

The **board of trustees has overall strategic responsibility** for ensuring appropriate filtering and monitoring arrangements are in place. Clear roles and responsibilities will be assigned to senior leadership, the DSL, the responsible trustee and IT support.



The DSL will take lead responsibility for safeguarding and online safety, including safeguarding concerns identified through filtering and monitoring. The DSL will work closely with senior leaders and IT staff or providers to ensure that safeguarding and technical expertise inform the school's arrangements.

The school will:

- Review its filtering and monitoring provision **at least annually**, involving senior leadership, the DSL, IT support and the responsible trustee, and record the outcomes and actions arising from the review.
- Carry out and record appropriate checks of filtering and monitoring systems, at a frequency informed by the school's risk profile.
- Ensure concerns or alerts identified through monitoring are reviewed and acted upon appropriately, with high-risk safeguarding concerns receiving prompt attention.
- Ensure staff understand their individual responsibilities for filtering and monitoring and know how to report concerns.
- Consider the needs and risk profile of the school community, including pupils' ages, SEND, EAL and known safeguarding vulnerabilities.
- Consider how school-managed devices are used both **on and off site**.
- Review arrangements when safeguarding risks, working practices, technology, devices or technical configurations change.
- Consider the risks associated with **generative AI**, including whether filtering and monitoring arrangements can appropriately address dynamic, personalised and AI-generated content.

These additions reflect the DfE's filtering and monitoring core standard, which was itself updated during 2026. The standard requires an annual review involving SLT, the DSL, IT support and the responsible trustee, recorded checks, defined responsibilities and explicit consideration of generative AI.

Review and communication

The school will carry out an **annual review of its wider approach to online safety**, informed by the risks faced by the school community, safeguarding incidents, emerging technology, and developments in online harms.

Regular safeguarding and child protection updates, including online safety, will be provided to all staff to ensure that they continue to have the relevant skills and knowledge to safeguard children effectively.

The Child Protection and Safeguarding Policy, including online safety arrangements, will be reviewed at least annually, and procedures will be updated more frequently where changes in risk, technology, statutory guidance, or school practice require this.

The school will work with **parents and carers** to promote online safety and provide appropriate information and support to help them understand online risks and the school's safeguarding arrangements.

This section summarises our approach to online safety and the use of mobile and smart technology. For full details, please refer to the school's **Online Safety Policy, Mobile Phone Policy, Acceptable Use arrangements and Staff Code of Conduct**, available through the school as appropriate.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative AI tools and chatbots such as ChatGPT and Google Gemini, as well as AI features integrated into search engines, social media, apps and other online services.



Penryn College recognises that AI has many potential uses, including enhancing teaching and learning and helping to protect and safeguard pupils. However, AI may also have the potential to facilitate or contribute to abuse, including bullying, harassment, grooming, exploitation, misinformation and the creation or sharing of harmful or inappropriate content. AI can also be used to create or manipulate convincing images, audio or video, including **deepfakes and intimate imagery**, which may be used to harm, humiliate, coerce or exploit children.

The school will treat safeguarding concerns involving AI in the same way as other safeguarding concerns and in accordance with this policy. **The use of AI does not reduce or change the school's safeguarding responsibilities.** Where AI is used to bully, harass or abuse another pupil, the school will respond in accordance with this policy and the school's Behaviour, Anti-Bullying, Online Safety and Child-on-Child Abuse policies, as appropriate.

Staff and pupils must use only AI tools which are **approved for use by the school**, where school approval is required, and must comply with any age restrictions, terms of use and school requirements relating to those tools. DfE guidance specifically states that schools should comply with age restrictions and that pupil-facing generative AI should have appropriate safeguards in place.

Where the school introduces or approves AI tools for use, it will consider the **safeguarding, online safety, data protection, security, equality and educational implications** of their use. Appropriate risk assessment and approval processes will be followed, taking account of the intended users, age and needs of pupils, including pupils with SEND, and the purpose for which the technology will be used.

The school will have regard to the DfE's **Generative AI Product Safety Standards** when assessing AI products for use within the school.

Staff must take particular care when using AI tools with **personal, confidential or safeguarding information**. Personal data must not be entered into an AI tool unless its use has been appropriately approved and the school is satisfied that the information will be processed lawfully and securely. Advice should be sought from the school's Data Protection Officer and/or IT lead where necessary.

AI-generated content must not be assumed to be accurate, appropriate or unbiased. Staff remain professionally responsible for materials and decisions arising from their use of AI and must apply **professional judgement and appropriate human oversight**, including checking AI-generated information for accuracy and suitability before using it. AI must not replace professional safeguarding judgement or decision-making.

Pupils will be taught, in an age and developmentally appropriate way, about the safe and responsible use of AI, including:

- How AI-generated content may be inaccurate, biased, misleading or manipulated.
- How AI may be used to create misinformation, deepfakes and other false or harmful content.
- The safeguarding and privacy risks associated with sharing personal information, images or other data with AI tools.
- The risks of using AI to create, manipulate or share abusive, discriminatory or intimate imagery.
- The importance of seeking help from a trusted adult where AI-generated content or interaction causes concern.
- The school's expectations regarding acceptable and responsible use of AI.

The school's requirements for **filtering and monitoring also apply to the use of AI**. The school will consider how and where generative AI products are used and whether its filtering and monitoring arrangements can appropriately respond to **real-time, dynamic, personalised and AI-generated content**. These arrangements will be reviewed as part of the school's wider filtering and monitoring provision.

The school recognises that AI and associated risks are developing rapidly. Safeguarding arrangements, risk assessments, staff training, curriculum content and relevant policies will therefore be **reviewed and updated as necessary** to reflect changes in technology, emerging risks and statutory and DfE guidance.



9. Notifying parents or carers

Where appropriate, we will discuss concerns about a child with the child's parents or carers. The DSL (or a deputy) will normally do this in the event of a safeguarding concern, suspicion or disclosure.

Other staff will only talk to parents or carers about safeguarding concerns following consultation with the DSL (or a deputy), unless there is an immediate need to take action to safeguard a child.

The child's **wishes and feelings will be taken into account**, where appropriate, when considering how and when parents or carers should be involved. However, the school's overriding responsibility is to safeguard and promote the welfare of the child.

Parents and carers will normally be involved in safeguarding matters at an appropriate stage. However, **parents or carers will not be informed before advice is sought or action is taken where doing so may:**

- Place the child or another person at increased risk of harm.
- Place the child at risk of further abuse, neglect, exploitation, coercion or intimidation.
- Compromise a child protection enquiry, police investigation or other safeguarding process.
- Lead to the loss or destruction of relevant evidence.
- Otherwise not be in the child's best interests.

In these circumstances, the DSL will seek advice from **the local authority children's social care and/or the police**, as appropriate, before parents or carers are contacted. The decision and rationale will be recorded.

The school recognises that safeguarding information may need to be shared **without the consent of a parent, carer or child** where there is a lawful basis to do so. Data protection legislation does not prevent the sharing of information for safeguarding purposes. Information will be shared in accordance with Section 6 of this policy and the statutory information-sharing guidance. The new statutory Information Sharing Duty comes into force on **30 September 2026**.

Child-on-child abuse

In cases involving allegations of child-on-child abuse, we will normally inform the parents or carers of the children involved at an appropriate stage, unless there is a safeguarding reason not to do so.

We will think carefully about **what information can appropriately be shared about another child and when**, taking account of confidentiality, data protection, the welfare of all children involved and any police or local authority children's social care involvement.

The school will work with the police and/or local authority children's social care, where appropriate, to ensure that its approach to communication and information sharing does not prejudice an investigation or place any child at additional risk.

The DSL, working with relevant agencies where appropriate and considering each case individually, will:

- Meet with the **child who has experienced harm and their parents or carers**, where appropriate, to explain the safeguarding and support arrangements being put in place, understand the child's wishes and feelings and discuss what support may be required and how the matter will be progressed.
- Meet separately with the **child alleged to have caused harm and their parents or carers**, where appropriate, to discuss the safeguarding and support arrangements for that child and any measures which may affect them, for example changes to classes, social times, transport or other arrangements, and the reasons for those decisions.
- Consider what information can appropriately be shared with each family while maintaining the **privacy and confidentiality of the other children involved**.
- Keep arrangements under review and maintain appropriate communication with the children and families involved as the situation develops.

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs and disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges, both **online and offline**. Children with disabilities may be at



increased risk of abuse, neglect and exploitation, and additional barriers can exist when recognising and responding to safeguarding concerns involving these pupils.

These additional barriers can include:

- Assumptions that indicators of possible abuse, neglect or exploitation, such as changes in behaviour or mood or the presence of an injury, relate to the child's SEND or health condition without further exploration.
- Pupils being more prone to peer-group isolation or bullying, including prejudice-based and discriminatory bullying, than other pupils.
- The potential for pupils with SEND or certain health conditions to be disproportionately impacted by behaviours such as bullying, abuse or exploitation without outwardly showing signs.
- Communication barriers and difficulties in recognising, managing or reporting safeguarding concerns.
- Pupils not understanding or recognising that what is happening to them may constitute abuse, neglect or exploitation.
- A pupil's need for intimate or personal care, or circumstances in which they may be more isolated from others.
- Increased dependency on adults for care and support.
- Cognitive understanding, including difficulties understanding the difference between fact and fiction in online content, repeating online content or behaviours in school, or understanding the consequences of doing so.

Staff must not assume that changes in a pupil's behaviour, mood, presentation, attendance or wellbeing are attributable to their SEND, disability or health condition. Staff should maintain **professional curiosity** and consider whether there may be an underlying safeguarding concern.

We will ensure that pupils with SEND, disabilities or health conditions have access to appropriate **pastoral support and support with communication**, including accessible ways of expressing concerns and reporting abuse.

Safeguarding information and education will be provided in ways which are appropriate to pupils' age, developmental level, communication needs and understanding.

Any safeguarding concern or report of abuse involving a pupil with SEND, disabilities or certain health conditions will require **close liaison between the DSL (or deputy) and the SENCO**, alongside other relevant professionals where appropriate.

Where necessary, safeguarding responses, risk assessments and support plans will take account of the pupil's individual needs, communication requirements and any reasonable adjustments required to enable them to participate meaningfully and have their wishes and feelings heard.

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity, abuse, neglect, exploitation and trauma can leave them vulnerable to further harm, as well as potentially creating barriers to **attendance, engagement, learning, behaviour, wellbeing and mental health**.

The DSL and all members of staff will work with and support social workers and other relevant professionals to help safeguard and promote the welfare and educational outcomes of vulnerable children. The school will contribute appropriately to **multi-agency safeguarding arrangements, assessments and plans**, including Family Help and child protection processes where relevant.



Where we are aware that a pupil has a social worker, the DSL will ensure that this information is considered when decisions are made about the pupil's **safety, welfare and educational outcomes**. Relevant information will be shared with staff on a **need-to-know basis** where this is necessary to safeguard and support the pupil.

This information will inform decisions about, for example:

- Responding to **absence from education**, including repeated or prolonged absence, where there are known safeguarding risks.
- Identifying changes or patterns in attendance, behaviour, presentation, relationships, wellbeing or educational engagement which may indicate an increased safeguarding concern.
- The provision of appropriate **pastoral, academic and wellbeing support**.
- Any reasonable adjustments or additional support necessary to enable the pupil to access and engage with education.
- Working with the child's social worker and other professionals to support the child's **safety, welfare, attendance and educational outcomes**.
- Responding to significant changes in the child's circumstances or safeguarding needs.
- Planning for transitions, changes of school or other changes in educational provision where these may affect the child's safety or support.

Staff should maintain **professional curiosity** and recognise that the involvement of a social worker does not mean that all safeguarding risks are already known or being managed by another agency. Any new or escalating safeguarding concern must be reported to the DSL (or deputy) in accordance with this policy and **must not be assumed to have already been shared with children's social care**.

12. Looked-after and previously looked-after children

We recognise that looked-after and previously looked-after children may be particularly vulnerable and will ensure that staff have the **skills, knowledge and understanding necessary to keep them safe and promote their welfare and educational outcomes**.

We will ensure that appropriate staff have access to the information they need in relation to:

- A child's looked-after legal status.
- Contact arrangements with birth parents or those with parental responsibility.
- The child's care arrangements and, where relevant, the level of authority delegated to their carer.
- Any other information necessary to safeguard and appropriately support the child.

The DSL will have details of the child's **social worker and the relevant Virtual School Head (VSH)** for looked-after children.

Information about looked-after and previously looked-after children will be shared with staff on a **need-to-know basis**, taking account of confidentiality, data protection and the individual child's safeguarding and educational needs.

The school has appointed a **designated teacher for looked-after and previously looked-after children**, who is responsible for promoting their educational achievement in accordance with statutory guidance. The designated teacher will have appropriate training and the relevant qualifications and experience to fulfil the role.

The designated teacher will:

- Work closely with the DSL to ensure that safeguarding concerns relating to looked-after and previously looked-after children are **identified and responded to promptly and effectively**.
- Work with social workers, Virtual School Heads, parents/carers and other relevant professionals, as appropriate, to promote children's educational achievement, attendance, wellbeing and engagement with education.



- Ensure that the educational needs of looked-after children are appropriately reflected in their **Personal Education Plan (PEP)**.
- Work with the relevant Virtual School Head to consider how **Pupil Premium Plus for looked-after children** can be used effectively to support their educational outcomes and meet needs identified through their PEP.
- Promote the educational achievement of previously looked-after children and seek advice from the Virtual School Head where appropriate.
- Ensure that the specific needs of previously looked-after children are appropriately considered within the school's **Pupil Premium strategy and support arrangements**.
- Work with parents and guardians of previously looked-after children, where appropriate, to understand the child's needs and identify appropriate educational support.
- Support relevant staff to understand how previous experiences of abuse, neglect, trauma, loss, separation or disrupted education may affect a child's learning, attendance, behaviour, relationships and emotional wellbeing.

Staff should maintain **professional curiosity** and recognise that a child's looked-after or previously looked-after status may be relevant when considering safeguarding concerns, changes in behaviour or presentation, attendance, educational engagement and the support they may require.

Where a safeguarding concern arises, the child's looked-after or previously looked-after status will inform, but will not replace, the school's normal safeguarding procedures. Concerns must be reported to the DSL (or deputy) and appropriate action taken without delay.

13. Pupils who are lesbian, gay or bisexual, or who are questioning their gender

We recognise that pupils who are lesbian, gay or bisexual (LGB), who are perceived to be LGB, or who are questioning their gender may experience additional safeguarding challenges, including bullying, prejudice, discrimination or abuse from other children.

The fact that a child may be LGB or questioning their gender is **not in itself a safeguarding concern**. However, children can be targeted because of their sexual orientation, perceived sexual orientation, gender non-conformity or because they are questioning their gender. Any safeguarding concerns must be responded to in accordance with this policy.

The school will challenge bullying, discriminatory and derogatory behaviour and will seek to create a culture in which all pupils feel safe, respected and able to speak to a trusted adult. See our Behaviour and Anti-Bullying policies for further information.

Risks can be compounded where children lack trusted adults with whom they can be open. We will therefore seek to reduce barriers to reporting and ensure pupils know how and where they can seek help and support.

Pupils who are questioning their gender

We recognise that children who are questioning their gender may need **sensitive and thoughtful support** from the school. Each child is different and decisions will be based on the individual circumstances of the child, with their **best interests, safety and wellbeing at the centre of decision-making**.

Where a pupil requests that the school supports an aspect of social transition, including a request relating to their name, pronouns or uniform, the school will consider the request carefully and individually, taking account of:

- The child's age, maturity, views, wishes and individual circumstances.
- The child's safety.

14. Complaints and concerns about school safeguarding policies

14.1 Concerns or allegations about staff

Any concern or allegation about a member of staff, supply staff member, volunteer, contractor or trainee teacher which indicates that they may have **met the harm threshold** will be dealt with in accordance with the school's procedures for managing allegations against adults working with children (see Appendix 2) and **Part Four of Keeping Children Safe in Education**.



This includes where it is alleged that a person who works 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 they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Any such concern must be **reported immediately to the Headteacher** (or to the Chair of Trustees where the concern relates to the Headteacher) and must not be dealt with solely through the school's general complaints procedure.

Where the harm threshold is met, or may be met, the school will follow the procedures set out in Appendix 2, including consultation with the **Local Authority Designated Officer (LADO)** as appropriate.

Concerns about adults which **do not meet the harm threshold**, including low-level concerns, will be managed in accordance with the school's low-level concerns procedures set out in Appendix 2 and the Staff Code of Conduct. Staff should not make their own determination about whether a concern is sufficiently serious to report. **All concerns about adults working with children should be reported through the appropriate school safeguarding procedures.**

14.2 Whistleblowing

Penryn College has a **Whistleblowing Policy**, which sets out the procedures for staff to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding arrangements.

All staff and volunteers should feel able to **raise concerns about safeguarding practice within the school** and should know that concerns will be taken seriously.

Where a member of staff has concerns about **poor or unsafe safeguarding practice, or potential failures in the school's safeguarding arrangements**, they should raise these concerns in accordance with the school's Whistleblowing Policy.

Staff should normally raise concerns through the school's internal whistleblowing procedures. However, where a member of staff feels **unable to raise a concern internally or believes that their genuine safeguarding concern is not being addressed**, they may use appropriate external whistleblowing channels.

The **NSPCC Whistleblowing Advice Line** is available to professionals who wish to raise concerns about how child protection issues are being handled in their own or another organisation.

Nothing within the school's Whistleblowing Policy prevents a member of staff from making a **direct referral to the local authority children's social care or the police** where they believe a child is at risk of harm or immediate action is required to safeguard a child.

Staff should refer to the school's **Whistleblowing Policy** for the full procedure and details of internal and external reporting routes.

15. Record Keeping

Penryn College will maintain accurate, secure and comprehensive safeguarding records and will retain records in accordance with the school's **records retention schedule and relevant data protection requirements**.

All safeguarding concerns, discussions, decisions and the **rationale for those decisions** must be recorded in writing. This includes decisions about whether or not to make a referral to another agency, including the local authority children's social care, the police or Prevent, and the reasons for those decisions.

If a member of staff is in any doubt about whether information should be recorded, they should discuss this with the DSL (or deputy).

Safeguarding records will include, as appropriate:

- A clear and comprehensive summary of the concern.
- Relevant factual information and, where appropriate, the child's own words.



- Details of how the concern was followed up.
- Details of any information shared, including with whom and why.
- Details of referrals made, or decisions not to make a referral, and the rationale for those decisions.
- A note of actions taken and decisions reached.
- The outcome, where known.
- Details of any ongoing support, safeguarding plan or review required.

Safeguarding and child protection records relating to individual children will be maintained **separately from the main pupil file** and in a manner which allows relevant information and chronology to be understood.

Records will be held securely and access will be restricted to those who have a **legitimate professional need to see the information**. Information will be shared in accordance with this policy, data protection legislation and current statutory information-sharing guidance.

Safeguarding records relating to individual children will be retained in accordance with the **school's records retention schedule and applicable legal and statutory requirements**.

Transfer of safeguarding records

Where a child moves to another school or college, including an in-year transfer, the DSL (or deputy) will ensure that the child's safeguarding and child protection file is transferred to the receiving setting as soon as possible.

The file must be:

- Transferred separately from the main pupil file.
- Transferred securely and confidentially.
- Transferred within 5 days of an in-year transfer, or within the first 5 days of the start of a new term where the child transfers at the beginning of a term.
- Sent in a way which allows the school to confirm that it has been received securely.
- Accompanied, where necessary, by relevant information to enable the receiving setting to put appropriate safeguarding and support arrangements in place.

The DSL (or deputy) will obtain confirmation that the safeguarding file has been received by the receiving school or college and will record the transfer appropriately.

Where there are significant or complex safeguarding concerns, the DSL (or deputy) will speak directly with the DSL (or deputy) at the receiving school or college before, or at the point of, transfer wherever possible. This is to ensure continuity of safeguarding arrangements and allow the receiving setting sufficient time to make any necessary preparations to safeguard and support the child.

The DSL (or deputy) will also ensure that relevant safeguarding information indicating that a pupil may pose a risk to themselves or others, including concerns relating to serious violence or harmful behaviour, is shared appropriately with the receiving setting.

The receiving setting should be made aware of relevant information required to support the child, including information which may need to be known by the DSL, SENCO or other appropriate staff.

The school will ensure that information sharing is necessary, relevant, proportionate, accurate, timely and secure and that decisions to share or not share safeguarding information, together with the rationale for those decisions, are appropriately recorded.



The school recognises that data protection legislation does not prevent the sharing of information where this is necessary to safeguard a child.

For further information:

- Appendix 2 sets out record-keeping requirements relating to safeguarding concerns, allegations and low-level concerns about staff and other adults working with children.
- Section 6 of this policy sets out the school's arrangements for confidentiality and information sharing.

16.1 All staff

All staff will receive appropriate safeguarding and child protection training as part of their induction. This will include online safety, filtering and monitoring, whistleblowing, staff behaviour and the school's procedures for reporting concerns about children and adults, so that staff understand the school's safeguarding systems and their individual responsibilities.

All staff will be provided with a copy of, or access to, **Keeping Children Safe in Education (KCSIE) Part One** and will be required to read Part One in full. Staff will also be required to read and understand the relevant sections of the school's Child Protection and Safeguarding Policy and Staff Code of Conduct.

The school will ensure that staff understand:

- That safeguarding is everyone's responsibility and that staff should always maintain the attitude that "it could happen here".
- How to identify indicators of abuse, neglect and exploitation, including those which occur outside the home and online.
- That safeguarding concerns may arise through changes in a child's behaviour, attendance, presentation, relationships or wellbeing and that children may not always make a direct disclosure.
- How to respond appropriately to a child who raises a concern or makes a disclosure.
- How and when to report safeguarding concerns to the DSL (or deputy), and that concerns must be acted upon immediately.
- The school's arrangements for community-based Early Help and Family Help, referrals to children's social care and multi-agency safeguarding.
- How to recognise and respond to child-on-child abuse, including sexual harassment, sexual violence, bullying and harmful online behaviour.
- The additional safeguarding vulnerabilities and barriers that may affect some children, including pupils with SEND, disabilities or health conditions.
- Their responsibilities for information sharing and record-keeping.
- How to report concerns, allegations or low-level concerns about adults working with children.
- The school's whistleblowing procedures and how to raise concerns about unsafe safeguarding practice.

Safeguarding and child protection training will be regularly updated and will:



- Be integrated, aligned and considered as part of the whole-school safeguarding approach, wider staff training and curriculum planning.
- Be informed by the school's safeguarding context and the advice and priorities of the three safeguarding partners.
- Include online safety and emerging online risks, including generative AI and AI-generated or manipulated content, where relevant.
- Ensure staff understand the expectations, roles and responsibilities relating to the school's filtering and monitoring arrangements.
- Reflect changes to statutory guidance, legislation, local safeguarding arrangements and emerging safeguarding risks.
- Have regard to the Teachers' Standards, including the expectations that teachers manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all pupils.

Prevent training

Relevant staff will receive appropriate Prevent training, including during induction where appropriate, to ensure that they understand the school's responsibilities under the Prevent duty.

Training will enable staff to:

- Understand the risk of children becoming susceptible to radicalisation into terrorism.
- Recognise concerning changes in behaviour or other indicators which may suggest that a child requires safeguarding support.
- Understand that there is no single profile or checklist which identifies a child who may be susceptible to radicalisation.
- Understand the role extremist ideologies may play in radicalisation.
- Know how to report concerns through the school's safeguarding procedures.
- Understand the school's Prevent referral arrangements and the support available through Prevent and, where appropriate, Channel.

The nature and frequency of Prevent training will be appropriate and proportionate to staff roles and the risks relevant to the school and its community.

Safeguarding updates

In addition to formal training, all staff will receive regular safeguarding and child protection updates, including online safety, as required and at least annually. These may be provided through staff meetings, briefings, emails, staff bulletins or other appropriate means.

Updates will ensure that staff continue to have the relevant skills and knowledge required to safeguard children effectively and are aware of changes to school procedures, statutory guidance, local safeguarding arrangements and emerging risks.

The school will maintain appropriate records of safeguarding training and updates undertaken by staff.



Other adults working in school

Supply staff, trainee teachers, contractors, volunteers and other adults working within the school will receive safeguarding information, induction and/or training appropriate to their role, responsibilities and level of contact with children.

This will include, as appropriate, information about:

- The school's Child Protection and Safeguarding Policy.
- The Staff Code of Conduct and expected standards of behaviour.
- The identity and role of the DSL and deputies.
- How to report a concern about a child.
- How to report a concern about an adult working with children.
- Whistleblowing arrangements.
- Relevant online safety and filtering and monitoring responsibilities.

Where contractors are provided through a PFI or similar contractual arrangement, the school will ensure that appropriate safeguarding arrangements and training requirements are in place.

16.2 The DSL and deputies

The DSL and any deputies will undertake appropriate **child protection and safeguarding training at least every two years** to provide them with the knowledge and skills required to carry out their roles effectively.

In addition, the DSL and deputies will **update their knowledge and skills at regular intervals and at least annually**, for example through safeguarding updates, e-bulletins, professional networks and meetings with other DSLs, local safeguarding training, and reading and reflecting on relevant safeguarding developments and statutory guidance.

Training and professional development will ensure that the DSL and deputies have the knowledge and skills necessary to:

- Understand their role and responsibilities as set out in **Keeping Children Safe in Education**.
- Identify, understand and respond to specific needs and circumstances which may increase a child's vulnerability to abuse, neglect or exploitation.
- Understand the specific harms that may place children at risk, including those occurring **outside the home and online**.
- Understand the processes, procedures and responsibilities of other agencies, particularly the local authority children's social care, police and health services.
- Support and advise staff in responding to safeguarding and child protection concerns.
- Support effective **information sharing, record-keeping and multi-agency working**.
- Understand and support the school's responsibilities relating to **online safety, filtering and monitoring**.



- Understand the importance of information sharing, including information that may help promote the educational outcomes of children who have or have had a social worker.
- Keep their knowledge of local safeguarding arrangements, referral pathways and available support services up to date.

The DSL and deputies will engage with the **three safeguarding partners and local safeguarding arrangements**, including relevant training opportunities and updates to local policies and procedures.

Prevent training

The DSL, deputies and any other member of staff with specific responsibility for Prevent will receive **appropriate, more in-depth Prevent training**.

This will include, as appropriate:

- Understanding susceptibility to radicalisation into terrorism.
- Understanding extremist and terrorist ideologies and their role in radicalisation.
- Recognising and responding to concerns about radicalisation, including online influences.
- Understanding how to make an appropriate **Prevent referral**.
- Understanding the **Channel process** and how to work with Channel panels where required.
- Understanding relevant local and national risks, emerging issues and referral trends.

Prevent-specific training for the DSL or Prevent lead will be **updated at least every two years**, and more frequently where necessary to reflect changes in risk, guidance or local circumstances.

Appropriate records will be maintained of the DSL's and deputies' safeguarding and Prevent training and professional development.

16.3 Trustees

All trustees will receive appropriate **safeguarding and child protection training, including online safety**, as part of their induction. This training will be regularly updated and will be appropriate to their strategic safeguarding responsibilities.

Trustees will also receive appropriate training and information relating to **Prevent and the school's filtering and monitoring arrangements**.

Training will ensure that trustees:

- Understand their **strategic leadership responsibility** for the school's safeguarding arrangements and their duty to safeguard and promote the welfare of children.
- Have the knowledge and information necessary to perform their safeguarding functions and provide appropriate **strategic challenge and support**.
- Understand the importance of a robust **whole-school approach to safeguarding**, with the best interests of children at its centre.



- Can test and assure themselves that the school's safeguarding policies, procedures, systems and training are **effective, implemented in practice and compliant with statutory requirements**.
- Understand the roles and responsibilities of the **DSL and deputies** and ensure that they have appropriate status, authority, time, funding, training and resources to fulfil their roles.
- Understand their strategic responsibilities relating to **online safety and filtering and monitoring**.
- Understand the school's responsibilities under the **Prevent duty**.
- Understand their responsibilities in relation to concerns and allegations about adults working with children.
- Understand relevant duties under the **Equality Act 2010, Human Rights Act 1998 and Public Sector Equality Duty**, alongside local multi-agency safeguarding arrangements.

All trustees will read and have regard to the relevant sections of **Keeping Children Safe in Education**, including **Part Two: The management of safeguarding**, and will receive appropriate updates when statutory guidance or safeguarding requirements change.

The Board of Trustees will ensure that there is an appropriately trained trustee with **specific strategic lead responsibility for safeguarding**, including the school's Prevent duty obligations.

The **Chair of Trustees**, and any other trustee who may be required to act as the **case manager** where an allegation is made against the Headteacher, will receive appropriate training in managing allegations against adults working with children.

The Board of Trustees will keep its safeguarding knowledge, skills and training needs under review and will undertake further training and development where required.

16.4 Recruitment – interview panels

At least one person conducting any interview for a post at Penryn College will have undertaken **appropriate safer recruitment training**.

Safer recruitment training will support those involved in recruitment to understand and apply the principles and requirements set out in **Keeping Children Safe in Education**, including the importance of safeguarding throughout the recruitment and selection process.

Those involved in recruitment will follow the school's safer recruitment procedures and relevant statutory guidance, including requirements relating to pre-appointment checks and the assessment of a candidate's suitability to work with children.

Where appropriate, members of recruitment panels will receive updates to ensure that their safer recruitment knowledge reflects changes to legislation, statutory guidance and safeguarding practice.

See the school's safer recruitment and pre-appointment checking procedures.

16.5 Staff who have contact with pupils and families

Penryn College recognises the importance of ensuring that staff who work with children and families are **appropriately supported, supervised and able to access safeguarding advice** relevant to their roles.



Staff will have access to appropriate opportunities for **support, professional discussion, coaching, training and supervision**, according to their role and responsibilities. This will enable staff to:

- Reflect on their work with children and families.
- Seek advice and support in relation to safeguarding concerns.
- Develop their safeguarding knowledge, skills and professional practice.
- Consider the needs, welfare and best interests of children.
- Discuss sensitive or complex issues appropriately and confidentially, while recognising that safeguarding information must be shared where necessary to protect a child.
- Identify any additional support or training they may require.

Staff undertaking roles involving **significant, complex or sustained safeguarding or pastoral responsibilities** will have access to appropriate supervision and professional support arrangements.

The DSL and senior leaders will promote a culture in which staff feel able to **seek advice, raise concerns, reflect on safeguarding practice and ask for support** where they are managing complex or challenging situations.

Supervision and professional support do not replace the requirement to report safeguarding concerns immediately in accordance with this policy.

17. Monitoring

Monitoring arrangements This policy will be reviewed annually by Fiona Williams. At every review, it will be approved by the full board of trustees.

18. Links with other policies

This policy should be read alongside the school's other relevant policies, procedures and guidance, including:

- Behaviour Policy
- Anti-Bullying Policy and procedures
- Child-on-Child Abuse procedures
- Staff Code of Conduct
- Low-Level Concerns and Allegations Against Staff procedures
- Safer Recruitment procedures
- Complaints Policy
- Whistleblowing Policy
- Health and Safety Policy
- First Aid Policy
- Supporting Pupils with Medical Conditions Policy
- Attendance Policy
- Children Missing or Absent from Education procedures
- Online Safety Policy
- Acceptable Use Policy
- Filtering and Monitoring procedures
- Equality Policy
- Special Educational Needs and Disabilities (SEND) Policy
- Relationships, Sex and Health Education (RSHE) Policy



- Curriculum Policy
- Mental Health and Wellbeing policies and procedures
- Educational Visits Policy
- Alternative Provision and off-site education procedures
- Designated Teacher for Looked-After and Previously Looked-After Children arrangements
- Data Protection Policy and Privacy Notices
- Records Management and Retention procedures
- Emergency, security and critical incident procedures

These policies and procedures form part of the school's **whole-school approach to safeguarding** and should be applied consistently with this Child Protection and Safeguarding Policy.

Where there is any uncertainty about whether an issue constitutes a safeguarding concern, staff should seek advice from the **DSL or a deputy** and follow the safeguarding procedures set out in this policy.

19. Alternative provision and off-site education

Where Penryn College places a pupil with an alternative provision provider, the school remains responsible for the pupil's safeguarding and educational outcomes. The school will satisfy itself that the provider has appropriate safeguarding arrangements, safer-recruitment checks and suitable staff, premises and curriculum. The school will maintain regular contact with the pupil and provider, monitor attendance and welfare, and act promptly on concerns. Safeguarding information will be shared on a need-to-know basis before placement where this is necessary to keep the child safe.

20. Attendance, children absent from education and elective home education

The school recognises that absence, particularly persistent or severe absence or repeated episodes of missing education, can be an important safeguarding indicator. Attendance information will be considered alongside behaviour, welfare and safeguarding information. The school will follow Working Together to Improve School Attendance and local procedures, make reasonable enquiries where a child is missing, and refer to children's social care or police where there is a safeguarding risk.

Where a parent/carer expresses an intention to remove a child from school for elective home education, the school will consider whether there are existing safeguarding concerns and will work with the local authority and other relevant professionals before the child's name is removed from roll where required by law and guidance. The school will share relevant safeguarding information lawfully and promptly.

21. Use of school premises, extracurricular activity and sport

Where another organisation or individual uses school premises or delivers activities involving children, the school will seek assurance that appropriate safeguarding and child-protection arrangements are in place. Safeguarding requirements will form part of relevant letting or partnership arrangements. Allegations arising from activities on school premises will be managed under the school's safeguarding procedures and, where appropriate, referred to the LADO.

The school recognises safeguarding risks that can arise in sport and extracurricular activity, including one-to-one coaching, changing arrangements, travel, overnight activity, photography, digital communication and positions of trust. Appropriate risk assessment, supervision and safer-working practices will apply.

22. Financial exploitation and modern slavery

Staff will be alert to children being coerced, controlled, deceived or exploited for financial benefit, including through money transfers, bank accounts, online scams, debt, theft, criminal activity or other forms of financial abuse.



Financial exploitation may overlap with criminal exploitation, sexual exploitation, trafficking or modern slavery. Concerns must be reported to the DSL and referred to children's social care and/or police where appropriate.

23. Prejudice-based harm, racism and discrimination

Penryn College will challenge racism, discrimination and prejudice-based harm. Staff will consider whether apparently isolated incidents form part of a wider pattern or create a safeguarding risk for a child or group of children. Safeguarding, behaviour, attendance and pastoral information will be considered together where appropriate. The school will review patterns and disproportionality and will take action through safeguarding, behaviour, curriculum, staff training and partnership work as required.

Appendix 1: Types of abuse

- Concern that FGM may be carried out.
- A child directly or indirectly indicating that they believe they are at risk.

These indicators are **not exhaustive and should not be considered in isolation**. Staff should remain professionally curious and must not make assumptions based solely on a child's ethnicity, nationality, religion, culture or family background. These definitions are based on the Department for Education's statutory guidance **Keeping Children Safe in Education 2026**.

Abuse, neglect and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, **multiple issues will overlap**.

Abuse is 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 the ill-treatment of others**. This can be particularly relevant to children who see, hear or experience the effects of domestic abuse.

Children may be abused within a family or in an institutional or community setting, by people known to them or, more rarely, by others. Abuse can take place **wholly online**, or technology may be used to facilitate abuse that takes place offline. Children may be abused by an adult or adults or by another child or children.

Physical abuse

Physical abuse is a form of abuse which may involve 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.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve:



- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- **Verbal abuse**, including persistent criticism, belittling or name-calling.
- Not giving a child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. This may include interactions beyond a child's developmental capability, overprotection, limitation of exploration and learning, or preventing the child from participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying, including cyberbullying, causing children frequently to feel frightened or in danger.
- The exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening.

Sexual abuse may involve physical or non-contact activities. It may include involving children in sexual images or activities, encouraging sexually inappropriate behaviour, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The sexual abuse of children by other children is a **specific safeguarding issue in education**, and all staff should be aware of the school's policies and procedures for identifying and responding to child-on-child abuse.

Neglect

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, for example as a result of maternal substance misuse.

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.
- Ensure access to appropriate medical care or treatment.
- Respond appropriately to a child's basic emotional needs.



Neglect may occur **inside or outside the home**, and staff should remain alert to changes in a child's presentation, behaviour, attendance, wellbeing or circumstances which may indicate that their needs are not being met.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on **Annex A of the UK Council for Internet Safety (UKCIS) guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people***.

Adult-involved nude and semi-nude sharing incidents are forms of **child sexual abuse** and must be treated as safeguarding concerns. Where adult involvement is known or suspected, the DSL will make an **immediate referral to the police and/or children's social care**, in accordance with local safeguarding procedures.

Staff should be aware that adult-involved incidents may initially appear to be child-on-child sharing because an adult may **pretend to be a child or young person online**, use a false identity or use a compromised account.

Adult-involved incidents commonly include **sexually motivated incidents** and **financially motivated sexual extortion**.

Sexually motivated incidents

In sexually motivated incidents, an adult may use online platforms to establish contact with a child or young person and attempt to obtain nude or semi-nude images.

The adult may use their real identity or a false identity and may pretend to be another child or young person in order to establish contact or gain trust. Communication may move from an open platform to private messaging or an **end-to-end encrypted (E2EE)** service.

Staff should be alert to circumstances in which a child or young person:

- Is contacted by an unfamiliar online account which appears to belong to another child or young person.
- Is rapidly drawn into inappropriate or sexualised online communication.
- Is encouraged to move communication from a public platform to private or encrypted messaging.
- Is pressured, coerced or manipulated into creating or sharing nude or semi-nude imagery.
- Is offered money, gaming credits, gifts or something else of value.
- Is threatened or blackmailed after an image has been obtained.
- Is presented with a **digitally manipulated or AI-generated image** as part of an attempt to coerce or blackmail them.
- Appears frightened, distressed or unusually concerned about online contact, messages or images.

Financially motivated sexual extortion

Financially motivated sexual extortion involves an offender threatening to share nude or semi-nude imagery, or purported imagery, unless the child or young person **provides money or does something else for the offender's benefit**.

An offender may use a false identity, pretend to be another child or young person, use a compromised account, obtain images through unauthorised access, or use **digitally manipulated or AI-generated imagery**.



Possible indicators include a child or young person:

- Being contacted unexpectedly by an unfamiliar or compromised online account.
- Being quickly moved into private or encrypted communication.
- Being pressured or manipulated into sharing an image.
- Being told that their account, images, personal information or contacts have been accessed.
- Being threatened that images will be shared with friends, family or others.
- Being asked for money or financial information following threats relating to an image.
- Being threatened using an image that has been stolen, altered or generated using AI.

Staff response

Where a member of staff becomes aware of an incident which may involve an adult, they must:

- **Report it to the DSL or a deputy immediately.**
- Not investigate the incident themselves.
- Not intentionally view, copy, print, save, forward or otherwise retain the imagery.
- Not ask the child to send or download the imagery.
- Reassure the child that they have done the right thing by telling someone and that they will be supported.
- Preserve relevant information about accounts, usernames, messages or platforms **without copying or retaining the nude or semi-nude imagery itself**, where this can be done safely and in accordance with advice from the DSL or police.

The DSL will consider the child's **immediate safety and welfare** and make an immediate referral to the police and/or children's social care where adult involvement is known or suspected.

The DSL will work with relevant agencies to determine subsequent action and support. The school will not undertake actions which could interfere with a police or children's social care investigation.

The child's welfare will remain the school's primary concern. Children will be supported without blame or judgement, recognising that grooming, manipulation, coercion, deception or threats may have been used by the offender.

A record of the safeguarding concern, decisions, referrals, advice received, actions taken and outcomes will be maintained in accordance with **Section 15 of this policy**. Copies of nude or semi-nude imagery will **not** be retained within the school's safeguarding records.

Children who are absent from education

All staff should be aware that children being **absent from education for prolonged periods and/or on repeated occasions**, and children missing education, can be a vital warning sign of a range of safeguarding concerns.



Absence from education may be associated with abuse, neglect or exploitation, including **child sexual exploitation and child criminal exploitation**, as well as other safeguarding concerns such as poor mental health, substance misuse, radicalisation, female genital mutilation (FGM) or forced marriage.

Attendance at school is an important **protective factor** for children. The school's response to persistent or repeated absence will therefore consider both the child's educational needs and whether their absence may indicate an emerging or increased safeguarding risk.

Some children may face additional barriers to attendance or be at increased risk of becoming missing from education. This may include children who:

- Are experiencing or are at risk of abuse, neglect or exploitation.
- Have a social worker or are known to children's social care.
- Are looked-after or previously looked-after.
- Are at risk of child sexual exploitation or child criminal exploitation.
- Are at risk of FGM, forced marriage, radicalisation or other forms of harm.
- Frequently go missing from home or care.
- Are involved with youth justice services.
- Have SEND, disabilities or health needs.
- Experience poor mental health or emotional difficulties.
- Are young carers.
- Experience bullying, discrimination or difficulties with peer relationships.
- Have recently moved into the area or have experienced significant changes in their family circumstances.
- Are from families experiencing housing instability or temporary accommodation.
- Are at risk of leaving education without a suitable onward destination.

Penryn College will follow its **Attendance Policy and procedures for children who are absent from education and children missing education**, alongside this Child Protection and Safeguarding Policy.

The school will take a **support-first and safeguarding-informed approach** to absence. This will include identifying emerging attendance concerns, seeking to understand the individual barriers affecting the child and family, providing or coordinating appropriate support and working with relevant agencies where necessary.

Staff will remain professionally curious about changes or patterns in attendance. Particular attention will be given to **repeated, prolonged, unexplained or concerning patterns of absence**, including where absence represents a change from a child's usual attendance.

Where a child has a social worker or is otherwise known to children's social care, the school will recognise that absence from education may **increase existing safeguarding risks** within the family or community and will work appropriately with the child's social worker and other professionals.



The school will maintain accurate admission and attendance records and will fulfil its statutory duties to share information with the local authority, including where a child leaves the school without a known onward educational destination or where other circumstances require notification to the local authority.

Where the whereabouts of a child are unknown, the school will make **reasonable enquiries**, working with the local authority and other agencies as appropriate, in accordance with statutory Children Missing Education requirements.

Staff will receive appropriate information and training to recognise safeguarding concerns that may be associated with absence from education and will report concerns to the **DSL or a deputy without delay**.

Where absence gives rise to a safeguarding concern, the school's normal safeguarding procedures will apply.

Community-based Early Help or Family Help may be appropriate where needs are emerging or additional support is required.

Where there is reason to believe that a child is **suffering or is likely to suffer significant harm**, a referral will be made to the local authority children's social care without delay. Where there is an immediate risk to a child's safety, the police will also be contacted.

Attendance procedures, enquiries about absence and attempts to provide attendance support **must not delay appropriate safeguarding action or referral**.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity.

CCE may involve an exchange for something the child needs or wants, for the financial advantage or increased status of the person exploiting them, and/or involve violence or the threat of violence. It may be committed or facilitated by individuals, groups, gangs or organised criminal networks and can occur **in person or online**.

CCE can affect any child. A child may appear to be participating willingly or may identify with the group exploiting them. However, **a child cannot consent to being exploited, abused or trafficked**, and apparent participation in criminal activity should not prevent staff from considering whether the child is being exploited.

Children may become trapped in exploitation through coercion, intimidation, threats towards themselves or their families, manipulation or debt. Criminal exploitation may also overlap with **trafficking, modern slavery, child sexual exploitation and other forms of abuse**.

CCE can take different forms, including children being coerced or manipulated into criminal activity such as:

- Transporting drugs or money as part of **county lines** activity.
- Being involved in the production or distribution of drugs.
- Theft or other acquisitive crime.
- Vehicle crime.
- Threatening or committing violence against others.
- Holding or transporting money or other items on behalf of those exploiting them.



Staff should recognise that children experiencing criminal exploitation may themselves display behaviour which appears harmful, challenging or criminal. **The possibility that a child is being exploited must be considered alongside any behavioural or disciplinary response.**

Indicators that a child may be experiencing CCE can include:

- Unexplained gifts, money or new possessions.
- Relationships or associations with individuals or groups linked to exploitation.
- Changes in friendships or peer groups.
- Changes in behaviour, emotional wellbeing or presentation.
- Repeated or prolonged absence from education.
- Going missing from home, school or care, or regularly returning home late.
- Declining engagement with education.
- Unexplained travel or being found in locations away from their home area.
- Increased secrecy around phones, social media, relationships or whereabouts.
- Signs of coercion, intimidation, fear or control by others.
- Being involved in offending or coming to the attention of the police in circumstances which may indicate exploitation.

Indicators should **not be considered in isolation**, and the absence of recognised indicators does not mean that exploitation is not taking place. Staff should remain professionally curious and consider the child's circumstances, relationships and wider context.

The experiences and indicators of exploitation may differ between children. Staff should avoid assumptions based on a child's **age, sex, ethnicity, disability, SEND, background or previous behaviour**.

Where a member of staff has concerns that a child may be experiencing or at risk of CCE, they must **report the concern to the DSL or a deputy without delay**.

The DSL will consider the child's immediate safety and wider safeguarding needs and will follow local safeguarding procedures. This may include referral to **the local authority children's social care, the police and other relevant specialist services**.

Where there is reason to believe that a child is suffering or is likely to suffer significant harm, a referral to children's social care will be made **without delay**. Where there is immediate danger, the police will also be contacted.

The school will work with safeguarding partners and other relevant agencies to ensure that the child is regarded first and foremost as a **child who may have been exploited and who requires appropriate safeguarding, support and protection**.

Child sexual exploitation



Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity.

CSE can occur over time or be a **one-off occurrence**. It may be perpetrated by an individual or by an organised network and may occur in person or online. It may also take place without the child's immediate knowledge, for example where images or videos are shared by others.

CSE can affect **any child who has been coerced or manipulated into sexual activity**, including 16- and 17-year-olds who can legally consent to sexual activity. A child cannot consent to being abused or exploited.

Children experiencing CSE may not recognise that they are being abused. They may trust the person exploiting them, believe that they are in a genuine friendship or romantic relationship, or feel loyalty towards the individual or group involved.

CSE may involve contact or non-contact sexual activity and may include the use of technology and online platforms to groom, manipulate, coerce or exploit a child.

CSE and **child criminal exploitation (CCE) can overlap**. Children experiencing either form of exploitation may be controlled through coercion, threats, manipulation, fear or dependency. Children experiencing CSE may also come to the attention of the police or criminal justice system because of actions they have taken while being coerced or exploited. Staff should remain professionally curious and consider the possibility of exploitation rather than viewing such behaviour solely as criminal or disciplinary.

Possible indicators of CSE may include a child:

- Entering into relationships or associations which involve a significant imbalance of power or control.
- Receiving unexplained gifts, money or possessions.
- Having relationships or associations with individuals or groups linked to exploitation.
- Going missing from home, school or care or returning home late.
- Being repeatedly or increasingly absent from education.
- Showing significant changes in behaviour, emotional wellbeing, presentation or relationships.
- Becoming increasingly secretive, particularly about relationships, online activity or their whereabouts.
- Showing signs of coercion, intimidation, fear or control by another person.
- Experiencing sexual health concerns or pregnancy.
- Being involved in offending or coming to the attention of the police in circumstances which may indicate coercion or exploitation.
- Experiencing other indicators of criminal or sexual exploitation.

Indicators must **not be considered in isolation**, and the absence of recognised indicators does not mean that exploitation is not occurring. Staff should consider the child's individual circumstances, relationships, vulnerabilities and wider context and avoid assumptions based on age, sex, ethnicity, disability, SEND, background or previous behaviour.

Where a member of staff has concerns that a child may be experiencing or at risk of CSE, they must **report the concern to the DSL or a deputy without delay**.



The DSL will consider the child's immediate safety and wider safeguarding needs and follow local safeguarding procedures. This may include referral to **the local authority children's social care, the police and relevant specialist services**.

Where there is reason to believe that a child is suffering or is likely to suffer significant harm, a referral to children's social care will be made **without delay**. Where there is immediate danger, the police will also be contacted.

The school will work with safeguarding partners and other relevant agencies to ensure that the child is regarded first and foremost as a **child who may have been exploited and who requires appropriate safeguarding, support and protection**.

Child-on-child abuse

Child-on-child abuse occurs when a child abuses another child. It can occur **inside or outside school, face-to-face or online**, and may occur simultaneously in different environments.

All staff should maintain an attitude of **"it could happen here"**. The absence of reports does not mean that child-on-child abuse is not occurring; children may not recognise their experiences as abuse or may face barriers to reporting them.

Child-on-child abuse is **never acceptable** and will not be dismissed as "banter", "just having a laugh", "part of growing up" or similar behaviour. Penryn College has a **zero-tolerance approach to sexual harassment and sexual violence**, meaning that such behaviour will always be taken seriously and responded to appropriately.

Child-on-child abuse can include, but is not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- Abuse within intimate personal relationships between children, sometimes referred to as **teenage relationship abuse**, including coercive or controlling behaviour.
- Physical abuse or threats of physical harm, including where technology is used to facilitate, threaten or encourage the behaviour.
- **Harmful sexual behaviour (HSB)**, including developmentally inappropriate, problematic or abusive sexual behaviour.
- Sexual violence.
- Sexual harassment, including sexualised comments, remarks or jokes and online sexual harassment, whether occurring as a standalone incident or as part of a wider pattern of behaviour.
- Coercing or pressuring another child into sexual activity.
- Consensual and non-consensual sharing of **nude and semi-nude images or videos**, including digitally manipulated or AI-generated intimate imagery.
- Upskirting and other forms of non-consensual image-based abuse.
- Initiation or hazing-type violence, harassment, abuse or humiliation, including where there is an online element.



- Online abuse, including abusive, harassing, discriminatory or misogynistic communications, threats, coercion, sexual harassment and the non-consensual sharing or manipulation of intimate imagery.

Harmful sexual behaviour

Harmful sexual behaviour can occur between children of **any age or sex**, between individual children or groups of children, and can occur face-to-face or online.

Sexual behaviour exists on a continuum. When considering whether behaviour is developmentally inappropriate, problematic or abusive, the school will consider the **ages and developmental stages of the children involved**, alongside factors including:

- The nature, frequency and context of the behaviour.
- Any difference in age, developmental stage, power or vulnerability.
- Whether coercion, pressure, intimidation, manipulation or threats were involved.
- Whether the behaviour was consensual where the children were capable of giving consent.
- Whether the behaviour forms part of a wider pattern or has escalated.
- The impact on the child or children who have experienced the behaviour.
- Any relevant SEND, communication needs or other vulnerabilities.
- Whether technology or online environments have facilitated or increased the harm.

Staff will recognise the importance of **identifying and responding to concerning behaviour early**. Sexualised, misogynistic, discriminatory or harmful behaviour will not be tolerated or normalised simply because it has not reached the threshold of sexual harassment or sexual violence.

Responding to child-on-child abuse

If a member of staff has any concern about child-on-child abuse, or a child makes a report to them, they must **act immediately and report the concern to the DSL or a deputy** in accordance with Section 7 of this policy.

In particular, **Sections 7.8 and 7.9** set out the school's procedures for responding to child-on-child abuse and the sharing of nudes and semi-nudes.

The school's response will be **child-centred, proportionate and safeguarding-led**. The DSL will consider the needs and safety of all children involved, including the child who has experienced harm, the child alleged to have caused harm and any other children who may have been affected.

Where appropriate, a **risk and needs assessment** will be undertaken and kept under review. This will consider the safety and support needs of the children involved and any risks within the school environment, during unstructured times, travelling to and from school, and online.

The school recognises that a child who displays harmful behaviour may themselves have experienced abuse, neglect, exploitation, trauma or other safeguarding difficulties. This will be considered when determining the appropriate safeguarding and support response.



However, the needs of a child who has displayed harmful behaviour will **not diminish the school's responsibility to protect and support the child who has experienced harm or other children who may be at risk.**

Safeguarding support and appropriate behavioural or disciplinary action may take place **alongside one another.** The school will work with children's social care, police and other specialist services where appropriate.

Penryn College will also consider whether an incident indicates a **wider pattern or safeguarding concern within the school or the child's wider environment** and will take appropriate action to address this.

Children will be encouraged and supported to report concerns, including concerns about behaviour they have experienced, witnessed or become aware of online. Children who report abuse will be taken seriously, listened to and supported and will not be made to feel that they are creating a problem by reporting their concerns.

Domestic abuse

Domestic abuse can have a significant impact on children. Children may experience domestic abuse directly or may **see, hear or experience the effects of abuse** between people to whom they are related or for whom there is parental responsibility.

Under the **Domestic Abuse Act 2021**, children who see, hear or experience the effects of domestic abuse and are related to the person being abused or the person carrying out the abuse are recognised as **victims of domestic abuse in their own right.**

Domestic abuse can include a range of abusive behaviours, including:

- Physical or sexual abuse.
- Violent or threatening behaviour.
- Controlling or coercive behaviour.
- Economic abuse.
- Psychological, emotional or other abuse.

Domestic abuse may occur between current or former intimate partners or between family members. It can affect people regardless of sex, gender, age, ethnicity, socioeconomic status, sexuality, disability or background and can take place **inside or outside the home.**

Children can experience the effects of domestic abuse in different ways. They may see or hear abusive behaviour, experience its consequences within the home or family, become involved in incidents, experience disruption to their home or family life, or be affected by coercive and controlling behaviour within the family.

Domestic abuse can have a significant and potentially long-lasting impact on a child's **safety, health, wellbeing, emotional development, behaviour, relationships, attendance and ability to learn.**

Older children may also experience abuse within their own intimate relationships. Where there are concerns about abuse within a relationship between children, staff will follow the school's **child-on-child abuse and safeguarding procedures.** The age of the children involved will be considered when determining the appropriate safeguarding response.



Staff should remain professionally curious where changes in a child's behaviour, attendance, presentation, emotional wellbeing, relationships or home circumstances may indicate that they are experiencing the effects of domestic abuse.

Where a member of staff has concerns about domestic abuse affecting a child, they must **report the concern to the DSL or a deputy without delay**. The school's normal safeguarding procedures will apply, including referral to children's social care or the police where appropriate.

Operation Encompass

Operation Encompass is an information-sharing arrangement between the police and educational settings which enables schools to receive timely information when a child may be a victim of domestic abuse.

There is a **statutory duty on police forces in England and Wales** to notify a child's educational setting where they have reasonable grounds to believe that the child may be a victim of domestic abuse following an incident attended by police.

This can include children who:

- Were directly involved in the incident.
- Saw or heard the incident.
- Were present within the home.
- Normally live at the address where the incident occurred but were not present at the time.
- Are otherwise connected to the household and may be temporarily or permanently living elsewhere.

Notifications will normally be received by the school's **Operation Encompass Key Adult, usually the DSL**, before the start of the next school day following the incident.

Following an Operation Encompass notification, the DSL or appropriately trained member of the safeguarding team will:

- Consider the child's immediate safety, wellbeing and support needs.
- Ensure that relevant information is recorded securely within the school's safeguarding records.
- Share information only with staff who need to know in order to safeguard or appropriately support the child.
- Put appropriate pastoral or safeguarding support in place.
- Consider whether further information or liaison with other agencies is required.
- Make or support a referral to children's social care or other relevant agencies where safeguarding concerns require this.

Operation Encompass does not replace the school's normal safeguarding procedures or statutory referral processes. Staff must continue to report concerns in accordance with this policy regardless of whether an Operation Encompass notification has been received.



Homelessness

Being homeless or being at risk of becoming homeless can present a **significant risk to a child's welfare, safety, wellbeing, attendance and educational outcomes**.

The DSL and deputies will be aware of the contact details and appropriate referral routes into the **local housing authority** and other relevant services so that concerns can be raised and support sought at the earliest appropriate opportunity.

Possible indicators that a child or family may be homeless or at risk of homelessness can include:

- Housing insecurity or temporary accommodation.
- Rent or mortgage arrears or significant household debt.
- A family being asked or required to leave their accommodation.
- Domestic abuse or other circumstances which make it unsafe or unreasonable for the family to remain in their accommodation.
- Frequent changes of address or temporary living arrangements.
- A child or family staying temporarily with friends or relatives because they have nowhere suitable to live.
- Housing circumstances which are having a significant impact on the child's safety, wellbeing, attendance or ability to engage in education.

Staff should report concerns about a child's housing circumstances to the **DSL or a deputy**, particularly where those circumstances may be affecting the child's welfare or creating additional safeguarding risks.

The DSL will consider the appropriate support and referral pathway and, where appropriate, work with the child and family, the local housing authority, children's social care and other relevant agencies.

Where the school is notified that a child has been placed in **temporary accommodation**, the DSL and relevant staff will consider whether the child requires additional safeguarding, pastoral, attendance or educational support and will liaise with relevant agencies where appropriate.

Housing difficulties may occur alongside other safeguarding concerns, including **domestic abuse, neglect, exploitation or family crisis**. Staff should therefore remain professionally curious and consider the child's circumstances as a whole.

Where there is reason to believe that a child is **suffering or is likely to suffer significant harm**, a referral will be made to the local authority children's social care without delay. Where a child is in immediate danger, the police will also be contacted.

Housing support or referral to the local housing authority **must not delay safeguarding action** where there are concerns about a child's safety or welfare.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called '**honour-based' abuse (HBA)** encompasses incidents or crimes committed to protect or defend the perceived 'honour' of a family and/or community. It can include **female genital mutilation (FGM), forced marriage**,



breast ironing/breast flattening, virginity testing, hymenoplasty, controlling or coercive behaviour, physical abuse and other forms of abuse.

There is **no honour in abuse**.

HBA often involves a wider network of family or community pressure and may involve multiple perpetrators. This can increase the risk to a child and make it particularly important that information is shared only with appropriate people and that staff do not take actions which could increase the risk to the child.

All forms of HBA are abuse and will be treated as safeguarding concerns. Staff should be alert to the possibility that a child may be at risk of HBA or may already have experienced it.

Where a member of staff has a concern about HBA, they must **report it to the DSL or a deputy without delay**. The DSL will follow local safeguarding procedures and make referrals to children's social care, police or specialist services as appropriate.

Staff must **not contact or involve family or community members** where doing so may place the child at increased risk, compromise a safeguarding enquiry or result in the child being removed from school or taken abroad.

Female genital mutilation (FGM)

FGM is a form of child abuse and is illegal in the UK.

The DSL will ensure that staff receive appropriate information and training to enable them to recognise children who may have experienced FGM or may be at risk.

Possible indicators that FGM may have occurred can include:

- A child disclosing that FGM has taken place.
- A family member disclosing that FGM has been carried out.
- Changes in a child's behaviour, emotional wellbeing or presentation.
- Repeated or prolonged absence from school.
- Difficulties participating in normal school activities.
- Frequent or unexplained health concerns.
- A child asking for help but being unable or unwilling to explain fully what has happened.

Possible indicators that a child may be at risk of FGM can include:

- A family history of FGM.
- A mother, sister or other close female relative having undergone FGM.
- A child or family member indicating that the child is to undergo a special procedure or ceremony.
- Plans for extended travel abroad where other indicators of risk are present.
- A child expressing concern or fear about an upcoming trip or family plans.

A parent, family member or another person expressing concern.



Where staff have concerns that a child may be at risk of FGM, they must report the concern to the **DSL or a deputy without delay** so that appropriate safeguarding action can be taken.

As set out in **Section 7.3 of this policy**, regulated health and social care professionals and **teachers have a specific statutory duty to report directly to the police where, in the course of their professional duties, they discover that FGM appears to have been carried out on a girl under the age of 18.**

This personal mandatory reporting duty cannot be transferred to the DSL. The member of staff should also inform the DSL, unless there is a compelling reason not to do so.

Staff must **not examine a child themselves** to determine whether FGM has taken place.

Forced marriage

Forced marriage is a form of abuse and a criminal offence.

A forced marriage is one in which one or both people do not freely consent to the marriage and pressure, coercion or abuse is used.

It is also illegal to do anything intended to cause a **child under the age of 18 to marry**, even where violence, threats or another form of coercion are not used.

Staff will receive appropriate safeguarding information and training to help them recognise potential indicators of forced marriage.

Staff should be alert to concerns including:

- A child expressing fear or concern about marriage or family expectations.
- Reference to an impending engagement or marriage which causes the child concern.
- A child expressing concern about an upcoming family trip or being taken abroad.
- Sudden or unexplained absence from education.
- A request for extended leave or a child not returning from a visit abroad.
- Changes in behaviour, emotional wellbeing, educational engagement or relationships.
- Increased restrictions, surveillance or control by family or community members.
- A child asking for help directly or indirectly.

Staff should be aware of the **'one chance' rule**: there may only be one opportunity to speak to a child who is at risk and to take appropriate safeguarding action.

If a child discloses, or a member of staff suspects, that they may be at risk of forced marriage, the member of staff will:

- Listen to and take the child seriously.
- Speak with the child in a **safe and private environment**, where appropriate.
- Not approach family members or others who may be involved.



- Not attempt to mediate between the child and their family.
- Not promise confidentiality.
- **Report the concern to the DSL or a deputy immediately.**
- Contact the police directly where there is an immediate risk to the child's safety.

The DSL will:

- Consider the child's immediate safety and safeguarding needs.
- Follow local safeguarding procedures and make a referral to **the local authority children's social care and/or the police** where appropriate.
- Seek specialist advice from the **Forced Marriage Unit (FMU)** where appropriate.
- Consider whether there is a risk that the child may be removed from the UK.
- Work with relevant safeguarding partners and specialist agencies.
- Ensure that information is shared carefully and only with those who need it in order to safeguard the child.
- Ensure that appropriate pastoral and safeguarding support is provided and kept under review.

Safeguarding action must not be delayed while seeking specialist advice. Where there is an immediate danger to the child, **the police will be contacted on 999.**

Preventing radicalisation

Children may be susceptible to extremist ideology and radicalisation. Protecting children from this risk forms part of the school's wider safeguarding responsibilities.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

- Negate or destroy the fundamental rights and freedoms of others.
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights.
- Intentionally create a permissive environment for others to achieve either of the above.

Terrorism involves the use or threat of action where the relevant legal conditions are met, including serious violence against a person, serious damage to property or serious interference with or disruption of an electronic system, where this is designed to influence government or intimidate the public and is undertaken for the purpose of advancing a political, religious, racial or ideological cause.

The Prevent duty

Under the **Counter-Terrorism and Security Act 2015**, Penryn College has a duty to have due regard to the need to help prevent people from being drawn into terrorism. This is known as the **Prevent duty**.

Prevent is part of the school's existing safeguarding responsibilities. Its purpose is to:

- Tackle the ideological causes of terrorism.



- Intervene early to support people who are susceptible to radicalisation.
- Help prevent people from becoming terrorists or supporting terrorism.

The school will maintain an appropriate **Prevent risk assessment and action plan**, informed by national, regional and local risks and developed with regard to information from relevant partners, including the local authority, police and safeguarding partners.

The school's approach will be proportionate to the age of its pupils, its local context and the identified level of risk.

Recognising concerns

There is **no single profile of a person who may be susceptible to radicalisation and no single pathway to becoming radicalised**. Radicalisation can occur over a long period or develop rapidly and can take place both **online and offline**.

A child's susceptibility may be influenced by a combination of circumstances, vulnerabilities, relationships, experiences, grievances and exposure to radicalising influences.

Staff should remain professionally curious about concerning changes in a child's behaviour or circumstances and consider these within the child's **wider context**, rather than relying on individual characteristics or a checklist.

Potential concerns may include, particularly where they occur together or represent a significant change:

- Accessing, sharing or promoting extremist or terrorist material.
- Expressing support for terrorist organisations, terrorist violence or terrorist activity.
- Attempting to justify the use of terrorist violence.
- Increasing engagement with individuals, groups or online communities promoting extremist ideologies linked to terrorism.
- Being targeted, groomed, manipulated or influenced by individuals or groups promoting terrorist or extremist ideology.
- Significant changes in behaviour or relationships alongside other indicators of radicalising influence.
- Expressing an intention to travel, meet individuals or undertake activity in circumstances which raise concerns about terrorism.
- Encouraging or attempting to influence others towards terrorist or terrorism-supporting ideology.

These indicators are **not exhaustive** and should not be considered in isolation.

Staff must not make assumptions about susceptibility to radicalisation based on a child's **religion, ethnicity, nationality, culture, political views, appearance, disability, SEND or other protected or personal characteristics**.

Holding strong opinions, criticising government policy, taking an interest in political or international affairs, practising a religion, expressing a cultural or religious identity, or engaging with lawful political or social causes **does not in itself indicate radicalisation**.

Responding to concerns

Staff will follow a **Notice, Check, Share** approach:



- **Notice** – identify a concerning change, behaviour, disclosure or other information.
- **Check** – consider the concern in context and, where appropriate, seek further information without attempting to investigate the matter.
- **Share** – report the concern to the DSL or a deputy so that an appropriate safeguarding assessment and response can be made.

If a member of staff is concerned that a child may be susceptible to radicalisation into terrorism, they must **report the concern to the DSL or a deputy without delay** and follow the procedures set out in **Section 7.5 of this policy**.

The DSL will consider the child's circumstances, vulnerabilities, protective factors and level of risk and will determine the appropriate response. This may include:

- Support within school.
- Community-based Early Help or Family Help.
- Seeking advice from the local authority Prevent lead or other safeguarding partners.
- Making a **Prevent referral**.
- Referral to children's social care where there are wider safeguarding concerns.
- Contacting the police where appropriate.

A Prevent referral does not automatically mean that a child will receive intervention through **Channel**. Where a referral indicates that further support may be appropriate, the case may be considered through the relevant multi-agency arrangements.

Where there is an **immediate risk of harm or a suspected terrorism-related offence requiring an urgent response, the police will be contacted immediately**.

Prevent training and online safety

The DSL, deputies and relevant staff will receive appropriate Prevent training in accordance with **Section 16 of this policy**.

Staff training will support staff to understand:

- The Prevent duty and the school's safeguarding responsibilities.
- Susceptibility to radicalisation.
- Extremist and terrorist ideologies.
- Online radicalisation and emerging risks.
- How to identify and report concerns.
- The Prevent referral process and available support.

The school will maintain appropriate **filtering and monitoring arrangements** and will consider the risk of online radicalisation as part of its online safety and Prevent risk assessments.



Through the curriculum and wider safeguarding education, pupils will be supported to develop the knowledge and skills needed to **think critically, recognise manipulation and harmful online content, challenge misinformation and extremist narratives appropriately, understand democratic values and know how to seek help.**

Further information about the school's Prevent arrangements is contained within relevant safeguarding, online safety, curriculum, filtering and monitoring, and staff training procedures.

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment between children are forms of **child-on-child abuse** and are never acceptable.

They can occur:

- Between children of any age or sex.
- Between two children or within groups of children.
- Face-to-face, online or through a combination of both.
- Inside or outside school.
- Within intimate relationships between children or in other peer relationships.

All staff should maintain an attitude of **"it could happen here"**. The absence of reports does not mean that sexual harassment, harmful sexual behaviour or sexual violence is not occurring.

Harmful sexual behaviour

Children's sexual behaviour exists on a continuum. Behaviour may range from developmentally expected behaviour through to **inappropriate, problematic, abusive or violent behaviour**.

The term **harmful sexual behaviour (HSB)** is used to describe sexual behaviour which is developmentally inappropriate and may cause harm to the child displaying the behaviour and/or to others. HSB can occur face-to-face, online or through a combination of both and must always be considered within a safeguarding context.

When considering HSB, the school will take account of the **ages and developmental stages of the children involved**, alongside the nature and context of the behaviour, any imbalance of power, vulnerability, coercion or intimidation, and the impact on the children involved.

Staff should recognise and respond to concerning behaviour **early**. Lower-level sexualised or harmful behaviour must not be dismissed or normalised simply because it has not reached the threshold of sexual harassment or sexual violence.

Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature which can occur **online or offline** and may occur alongside other forms of sexual abuse.

It may include sexualised comments, remarks or jokes; unwanted sexualised attention; sexualised bullying; sexualised online behaviour; non-consensual image-based behaviour; or other unwanted behaviour of a sexual nature.

Sexual harassment may be a standalone incident or form part of a wider pattern of behaviour.



Penryn College will not tolerate or normalise sexual harassment, sexualised bullying, misogynistic or discriminatory behaviour. Staff will challenge inappropriate behaviour and language and will not dismiss it as **“banter”, “having a laugh”, “part of growing up” or similar behaviour**.

Sexual violence

Sexual violence between children is a serious safeguarding matter and may also constitute a criminal offence.

Any report or concern relating to sexual violence will be taken seriously and responded to immediately in accordance with the school's safeguarding procedures.

Responding to reports

Children who experience HSB, sexual harassment or sexual violence may find the experience distressing and it may have a significant impact on their **safety, wellbeing, relationships, attendance and education**. This may be particularly difficult where the child alleged to have caused harm attends the same school.

Where a child makes a report, staff will:

- Listen carefully and take the report seriously.
- Reassure the child that they have done the right thing by telling someone.
- Make clear that the child is **not to blame** for the abuse or harassment they have experienced.
- Ensure that the child is not made to feel ashamed or that they are creating a problem by reporting their concerns.
- Explain, in an age and developmentally appropriate way, what will happen next.
- Avoid asking unnecessary or leading questions or attempting to investigate the matter.
- **Report the concern to the DSL or a deputy immediately.**
- Record the concern accurately in accordance with the school's safeguarding procedures.

The DSL will consider the **wishes and feelings of the child who has experienced harm**, alongside the school's responsibility to safeguard them and other children.

The school's response will consider the needs and safety of **all children involved**, including the child who has experienced harm, the child alleged to have caused harm and any other children who may have witnessed or been affected by the behaviour.

Where appropriate, the DSL will undertake or coordinate a **risk and needs assessment** and will consider appropriate safety measures, support, referrals and liaison with children's social care, police or specialist services.

Safeguarding support and appropriate behavioural or disciplinary action may take place **alongside one another**.

The school recognises that children who display harmful sexual behaviour may themselves have safeguarding or support needs. These will be appropriately considered without diminishing the school's responsibility to safeguard and support the child who has experienced harm and any other children who may be at risk.

Wider school culture



Penryn College will consider whether individual incidents indicate **wider patterns, cultural or environmental concerns** within the school.

The school will:

- Identify and respond to patterns of concerning, problematic or inappropriate behaviour.
- Consider whether particular locations, times, online environments or peer groups present increased risks.
- Challenge sexism, misogyny/misandry, sexual harassment and other discriminatory or derogatory behaviour.
- Review safeguarding, behaviour and pastoral arrangements where incidents identify areas for improvement.
- Provide appropriate staff training and preventative education.
- Ensure that pupils know how to report concerns and have confidence that they will be listened to and supported.

Some children may experience additional barriers to recognising or reporting sexual harassment or sexual violence, including children with **SEND or disabilities**, children affected by discrimination or prejudice, and children who have communication or other additional needs. Staff will ensure that reporting and support arrangements are accessible and responsive to individual needs.

If staff have any concern about harmful sexual behaviour, sexual harassment or sexual violence, or a child makes a report to them, they must follow the procedures set out in **Section 7 of this policy**. In particular, **Sections 7.8 and 7.9** set out Penryn College's procedures for responding to child-on-child abuse and the sharing of nudes and semi-nudes.

Serious violence

Serious violence can have a significant impact on children and communities. Children may be **victims of serious violence, involved in causing harm, or both**, and involvement in violence may itself indicate that a child has safeguarding or support needs.

Staff should be alert to indicators which may suggest that a child is at risk of, or involved in, serious violence. These may include:

- Increased, repeated or unexplained absence from school.
- Changes in friendships or associations, including relationships with older individuals or groups.
- A significant decline in educational engagement or performance.
- A significant change in behaviour, presentation or emotional wellbeing.
- Unexplained injuries or concerns that a child has been assaulted.
- Unexplained gifts, money or new possessions.
- Increasing secrecy or unexplained changes in a child's activities or whereabouts.
- Concerns that a child is being exploited, coerced, threatened or controlled by others.



- Involvement in offending or increasing contact with the police or other agencies.
- Concerns about violence, threats of violence or other behaviour which places the child or others at risk.

Unexplained money, gifts or possessions, changes in relationships or other concerning behaviour may indicate that a child has been approached by, or become involved with, individuals or groups associated with **criminal exploitation**.

Risk of involvement in serious violence may be increased by a range of individual, family, peer, educational and community circumstances. These can include:

- Frequent or prolonged absence from education.
- Suspension, permanent exclusion or disengagement from education.
- Previous experiences of abuse, neglect, exploitation or other adversity.
- Previous involvement in offending.
- Exposure to violence within the family or community.
- Association with peers or adults involved in offending, exploitation or serious violence.
- Experiences of criminal exploitation or coercion.

Risk factors and indicators must **not be considered in isolation** and staff should not make assumptions about a child's likelihood of involvement in serious violence based on their sex, ethnicity, background or other personal or protected characteristics.

Staff should be particularly alert to risks which may arise **outside the school premises**, including during journeys to and from school and in locations within the community where children may be at increased risk.

Responding to concerns

If a member of staff has concerns that a child may be at risk of, involved in, or affected by serious violence, they must **report the concern to the DSL or a deputy without delay**.

The DSL will consider:

- The child's immediate safety and welfare.
- The risk posed to or by the child and the safety of other children.
- Whether the child may be experiencing abuse, exploitation, coercion or other safeguarding concerns.
- The child's relationships, education, attendance and wider circumstances.
- Whether other children, siblings or peer groups may also be at risk.
- Appropriate support, safety planning and preventative intervention.
- Whether information should be shared with, or a referral made to, children's social care, police or other relevant agencies.

Where appropriate, the school will work with safeguarding partners and other relevant agencies to provide **early and coordinated support** and reduce the risk of further harm.



Where there is reason to believe that a child is **suffering or is likely to suffer significant harm**, a referral will be made to the local authority children's social care without delay. Where there is an immediate risk of serious harm, the police will be contacted.

A child who has displayed violent behaviour may themselves be experiencing **abuse, neglect, exploitation, trauma, coercion or other unmet needs**. The school will consider these safeguarding and support needs alongside any appropriate behaviour or disciplinary response.

Safeguarding action and support **do not prevent the school from taking appropriate action under its Behaviour Policy**. The two processes may operate alongside one another.

Concerns about serious violence will be considered alongside the school's procedures relating to **child criminal exploitation, child-on-child abuse, attendance and children absent from education**.

Checking the identity and suitability of visitors

Penryn College will take appropriate steps to ensure that visitors to the school are **identified, appropriately checked and managed in accordance with the purpose of their visit and the level of safeguarding risk**.

All visitors will be required to follow the school's visitor procedures. This will normally include:

- Reporting to reception on arrival.
- Providing their name, organisation and reason for visiting.
- Verifying their identity where appropriate.
- Signing in using the school's visitor system.
- Wearing the appropriate visitor identification or badge while on site.
- Following any instructions regarding supervision, access to the site and safeguarding arrangements.

Where a visitor is not known to the school, staff will establish their **identity, credentials and reason for visiting** before allowing appropriate access to the school.

Visitors attending in a professional capacity

Visitors attending in a professional capacity may include social workers, educational psychologists, health professionals, local authority officers, external agency workers and other professionals working with children or the school.

The school will:

- Check the visitor's identity and professional credentials as appropriate.
- Be satisfied that the visitor has undergone the **appropriate level of DBS and other relevant checks** where these are required for the work they will undertake.
- Where appropriate, obtain confirmation from the visitor's employer or organisation that the necessary safeguarding and recruitment checks have been completed.



- Determine, using professional judgement and taking account of the circumstances of the visit, whether the visitor requires supervision while on the school site.

The school will not routinely request a new DBS check for a visitor where this is not required. The level of checking and supervision will be **appropriate and proportionate to the nature of the visit and the visitor's contact with children**.

Other visitors

Visitors such as parents, carers, relatives or other people attending school events will not routinely require DBS or barred list checks solely because they are visiting the school.

The Headteacher or other authorised member of staff will use professional judgement to determine the appropriate arrangements for **access, identification, supervision and safeguarding** according to the nature and purpose of the visit.

Visitors must not be given unsupervised access to children unless the school is satisfied that this is appropriate and that any necessary safeguarding checks and arrangements are in place.

Visiting speakers and external organisations

The school will have appropriate procedures for the **approval and management of visiting speakers and external organisations**.

Before agreeing to a visiting speaker or external event, the school will undertake proportionate checks and due diligence to establish that the speaker, organisation and proposed content are suitable for the intended audience and do not present an unacceptable safeguarding risk.

In accordance with the **Prevent duty**, the school will consider whether an external speaker or event could expose pupils to extremist narratives which encourage participation in or support for terrorism or otherwise create a risk of radicalisation.

Visiting speakers will be **appropriately supervised** and managed in accordance with the school's risk assessment and safeguarding procedures.

The school will also ensure that the use of external speakers and agencies is consistent with its responsibilities relating to **political impartiality and the balanced presentation of political issues**.

Use of school premises

Where external individuals or organisations use school premises or facilities, the school will consider the safeguarding implications and undertake appropriate checks and risk assessment.

The school will not knowingly allow its premises, facilities or resources to be used to **facilitate criminal activity, promote or support terrorism, radicalise children or create an unsafe environment for pupils**.

Any safeguarding concern arising from a visitor, visiting speaker, contractor or external organisation will be reported immediately in accordance with the school's safeguarding procedures.



Appendix 2: Low-Level Concerns About Adults

Statement of intent

Penryn College is committed to creating and maintaining an **open and transparent safeguarding culture** in which all concerns about adults working in or on behalf of the school are shared responsibly, recorded and dealt with promptly and appropriately.

This includes concerns relating to **staff, supply staff, trainee teachers, volunteers and contractors**.

The term '**low-level concern**' **does not mean that a concern is insignificant**. A low-level concern may be small or may initially amount to no more than a sense of unease or a 'nagging doubt' about the behaviour of an adult working in or on behalf of the school.

Penryn College recognises that creating a culture in which concerns are identified and shared at the earliest opportunity helps to:

- Identify inappropriate, problematic or concerning behaviour early.
- Minimise the risk of abuse.
- Ensure that adults working in or on behalf of the school understand and maintain appropriate professional boundaries.
- Ensure that staff act in accordance with the Staff Code of Conduct and the values and expectations of Penryn College.
- Identify patterns of behaviour or concerns which may not be apparent when individual incidents are considered in isolation.
- Protect children and promote their welfare.
- Protect adults working in or on behalf of the school from potential misunderstandings or false allegations by ensuring that concerns are considered fairly, consistently and appropriately.

All adults working in or on behalf of Penryn College are expected to maintain **high standards of professional conduct and appropriate professional boundaries** with children at all times.

Staff will be made aware of the standards of behaviour expected of them through the **Staff Code of Conduct, safeguarding induction, training and ongoing professional development**.

All staff are expected to report concerns about the behaviour of an adult working in or on behalf of the school, **no matter how small the concern may appear**. Staff should not make their own determination about whether a concern is sufficiently serious to report.

Concerns will be considered promptly and appropriately so that the school can determine whether:

- The behaviour is consistent with the Staff Code of Conduct and the law.
- The concern constitutes a **low-level concern**.
- The concern meets, or may meet, the **harm threshold** and should therefore be managed under the school's procedures for allegations against adults.



- Further information, advice or action is required.

Low-level concerns will be recorded, reviewed and considered for **patterns of behaviour or wider safeguarding implications**.

The purpose of this approach is to create a culture of **openness, trust and transparency**, in which the school's values and expected standards of behaviour are understood, lived, monitored and reinforced by everyone working in or on behalf of Penryn College.

Safeguarding children is the paramount consideration. No concern about the conduct of an adult should be ignored or withheld because an individual is uncertain about its seriousness.

1. Legal framework

This appendix has due regard to relevant legislation and statutory guidance, including, but not limited to:

- UK General Data Protection Regulation (UK GDPR).
- Data Protection Act 2018.
- Children Act 1989.
- Children Act 2004.
- Education Act 2002.
- DfE (2026) *Keeping Children Safe in Education 2026*.
- DfE (2026) *Working Together to Safeguard Children 2026*.

This appendix should be read alongside the following Penryn College policies and procedures:

- Child Protection and Safeguarding Policy.
- Staff Code of Conduct.
- Procedures for managing allegations and concerns about adults working in or on behalf of the school.
- Whistleblowing Policy.
- Data Protection Policy.
- Safer Recruitment procedures.
- Disciplinary procedures, where applicable.

Where there is any uncertainty about whether a concern constitutes a low-level concern or meets the harm threshold, it must be **reported and considered in accordance with the school's safeguarding procedures**. Staff should not make this determination themselves.

2. Definitions

For the purposes of this policy, a **low-level concern** is any concern, no matter how small, and even if no more than a sense of unease or a 'nagging doubt', that an adult working in or on behalf of Penryn College 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 Local Authority Designated Officer (LADO).

The term '**low-level**' **does not mean that the concern is insignificant.**

Examples of behaviour which may constitute a low-level concern include, but are not limited to:

- Being over-friendly with children.
- Showing favouritism towards particular children.
- Taking photographs of children on a personal mobile phone or other personal device contrary to school policy.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door in circumstances inconsistent with school expectations.
- Humiliating a child.
- Communicating with children through personal or unauthorised accounts or platforms contrary to school policy.
- Other conduct which is inconsistent with the professional boundaries and expectations set out in the Staff Code of Conduct.

Such behaviour can exist on a **wide spectrum**. It may be inadvertent or thoughtless, may appear inappropriate when considered without its full context, or may ultimately indicate behaviour of greater concern. The purpose of reporting is to ensure that the concern can be considered appropriately and in context.

The harm threshold

A concern is **not a low-level concern** where it meets, or may meet, the harm threshold.

The harm threshold is met where it is alleged that a person who works 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 they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Concerns which meet, or may meet, the harm threshold will be managed under the school's procedures for **allegations against adults working in or on behalf of the school**, including consultation with or referral to the LADO as appropriate.

Staff are **not responsible for deciding whether a concern is low-level or whether the harm threshold has been met.** All concerns about an adult's conduct should be reported through the appropriate safeguarding procedure so that this determination can be made by the appropriate person.

Low-level concerns will be taken seriously, recorded and reviewed appropriately. Individual concerns will also be considered collectively so that **patterns of concerning, problematic or inappropriate behaviour** can be identified.



A pattern of low-level concerns may indicate a safeguarding issue which is more significant than an individual incident considered in isolation. Equally, consideration of the context may establish that behaviour was appropriate or that there is a reasonable explanation. The school will ensure that concerns are considered **fairly, consistently and proportionately**, with the safety and welfare of children as the paramount consideration.

3. Roles and responsibilities

The Board of Trustees

The Board of Trustees is responsible for ensuring that Penryn College:

- Complies with its safeguarding and child protection responsibilities.
- Has effective policies and procedures for managing allegations and low-level concerns about adults working in or on behalf of the school.
- Has an effective Staff Code of Conduct which sets clear expectations regarding professional behaviour and boundaries.
- Promotes an open and transparent safeguarding culture in which staff feel confident to report concerns.
- Ensures that appropriate safeguarding training, including training relating to low-level concerns and professional conduct, is provided.
- Ensures that appropriate arrangements are in place for concerns or allegations relating to the Headteacher.

The **Chair of Trustees** will manage low-level concerns or allegations relating to the Headteacher, seeking advice from the LADO where appropriate.

The Headteacher

The Headteacher has overall responsibility for the management of low-level concerns about adults working in or on behalf of the school.

The Headteacher will:

- Ensure that this procedure and the Staff Code of Conduct are implemented consistently.
- Ensure that staff understand expected standards of professional behaviour and how to report concerns.
- Receive and appropriately consider low-level concerns.
- Determine whether a concern is consistent with the Staff Code of Conduct, constitutes a low-level concern, or meets or may meet the harm threshold.
- Consult the DSL and other appropriate senior staff where helpful.
- Seek advice from the LADO where there is any doubt about whether the harm threshold has been met.
- Ensure appropriate action is taken in response to concerns.
- Ensure low-level concerns are appropriately recorded, stored and reviewed.
- Consider whether individual concerns or patterns of concerns indicate wider cultural, training, policy or safeguarding issues within the school.



The Headteacher may consult the DSL when determining the appropriate response to a low-level concern, but **the Headteacher remains the ultimate decision-maker in respect of low-level concerns about staff.**

The DSL

The DSL will:

- Provide safeguarding advice and support to the Headteacher and staff.
- Receive concerns where these are reported through the school's safeguarding arrangements and ensure that they are passed promptly to the Headteacher.
- Support the Headteacher in considering the safeguarding context of a concern.
- Assist in identifying any wider safeguarding implications for children.
- Liaise with safeguarding partners and other agencies where appropriate.
- Support appropriate record-keeping and the identification of patterns or themes.
- Ensure that the welfare and support needs of any child affected by an adult's behaviour are appropriately considered.

The DSL does not replace the Headteacher's responsibility for determining and managing low-level concerns about staff.

All staff

All staff are responsible for:

- Adhering to the Staff Code of Conduct and maintaining appropriate professional boundaries with children.
- Understanding the position of trust they hold and the power imbalance inherent in adult-child relationships.
- Remaining alert to inappropriate, problematic or concerning behaviour by adults.
- Reporting concerns about adults **without delay**, however small or uncertain the concern may appear.
- Not attempting to determine for themselves whether a concern is low-level or meets the harm threshold.
- Cooperating appropriately with any subsequent safeguarding or employment process.
- Self-reporting situations in which their own conduct may have fallen below expected professional standards or could reasonably be misinterpreted.

4. Creating a culture in which concerns are reported

Penryn College will promote an **open and transparent safeguarding culture** in which expected standards of behaviour and professional boundaries are clear and consistently applied.

Adults working in or on behalf of the school occupy a position of **trust, responsibility, authority and influence** in relation to children. Staff must recognise the inherent power imbalance within adult-child relationships and maintain appropriate professional boundaries at all times.

All pupils under the age of 18 are children in law. Staff must maintain an appropriate professional relationship regardless of a pupil's age, maturity or year group.



Staff will receive appropriate information and training through induction and ongoing safeguarding training on:

- The Staff Code of Conduct.
- Professional boundaries.
- Appropriate and inappropriate behaviour.
- Low-level concerns and the harm threshold.
- How and to whom concerns should be reported.
- Self-reporting.
- Whistleblowing arrangements.

Inappropriate or concerning behaviour can exist on a wide spectrum. Behaviour may be inadvertent or thoughtless, may appear inappropriate when considered without its full context, or may indicate a more significant safeguarding concern.

Examples of behaviour which may constitute a low-level concern are set out in **Section 2 of this appendix**. Whether particular behaviour constitutes a low-level concern will depend on the circumstances and context.

Staff must report concerns even where they are uncertain whether behaviour was intentional or whether it constitutes a breach of professional standards.

The school recognises that staff may find it difficult to raise concerns about colleagues, particularly colleagues in positions of authority. Staff will be supported to understand that **safeguarding children takes priority over professional loyalty or concerns about causing difficulty for a colleague**.

No member of staff should experience detrimental treatment for raising a genuine safeguarding concern in good faith. Staff who feel unable to raise a concern through the normal school procedures should follow the **Whistleblowing Policy**.

The school will periodically consider whether low-level concerns indicate wider issues within its culture, policies, working practices, supervision or training and will take appropriate action where improvements are identified.

5. Reporting low-level concerns

All concerns about an adult working in or on behalf of Penryn College should be **reported without delay**.

Concerns about a member of staff, supply staff member, trainee teacher, volunteer or contractor should normally be reported to the **Headteacher** in accordance with the school's safeguarding procedures.

Where a concern is initially reported to the DSL or another senior member of staff, it must be passed to the Headteacher promptly.

Staff may report concerns verbally or using the school's agreed low-level concern reporting process. A verbal report must subsequently be appropriately recorded.

Staff should report concerns **as soon as reasonably possible following the behaviour or incident**. A concern should still be reported where time has passed or the member of staff only later recognises the significance of what they observed.



The school will not impose a requirement that a concern must be reported within a particular number of hours in order for it to be considered.

Where a concern relates to the **Headteacher**, it must be reported to the **Chair of Trustees**.

Where a concern relates to an adult employed by a supply agency, contractor or another organisation, it should be reported to the Headteacher. The school will liaise with the individual's employer or organisation as appropriate while retaining responsibility for ensuring that safeguarding concerns arising within the school are properly addressed.

Where a concern arises about an adult working for an organisation using school premises, the school will follow its safeguarding procedures and take appropriate action, including liaison with the organisation, LADO, children's social care or police where required.

Staff may request that their identity is kept confidential when reporting a concern. The school will respect this **as far as reasonably possible**, but cannot guarantee anonymity where disclosure is necessary to safeguard a child, establish the facts or ensure a fair process.

6. Self-reporting

Penryn College will maintain a culture in which staff are encouraged and feel confident to **self-report**.

A member of staff should self-report where, for example, they:

- Find themselves in a situation which could reasonably be misinterpreted.
- Believe their behaviour might appear compromising to others.
- Recognise on reflection that their behaviour may have fallen below the professional standards expected by the school.
- Believe that they may have inadvertently breached a professional boundary or the Staff Code of Conduct.

Self-reporting enables the school to consider the circumstances openly and promptly, provide appropriate support or guidance and address any professional boundary or safeguarding issues.

A self-report will be considered **fairly and objectively** in the same way as any other concern. The fact that an individual has self-reported, together with the circumstances and their response to the concern, may form part of the contextual information considered when determining the appropriate action.

7. Evaluating concerns

When a low-level concern is reported, the Headteacher will collect sufficient information to determine the appropriate response.

This will normally include:

- Speaking to the person who raised the concern, unless the concern was raised anonymously and this is not possible.
- Reviewing the circumstances and context in which the concern arose.
- Considering whether further information is required from witnesses or other sources.
- Considering whether the behaviour is consistent with the Staff Code of Conduct and the law.



- Considering any previous low-level concerns relating to the same individual and whether a pattern is emerging.
- Considering any safeguarding implications for the child or other children.
- Speaking to the individual about whom the concern has been raised, where appropriate.
- Seeking advice from the DSL, HR, LADO or other appropriate professionals where necessary.
- Recording the decision, action taken and rationale.

Where there is **any doubt about whether a concern meets the harm threshold**, the Headteacher will seek advice from the LADO.

The Headteacher will determine whether:

1. The behaviour is consistent with the Staff Code of Conduct and the law and no safeguarding concern is established.
2. The behaviour constitutes a low-level concern.
3. The concern meets, or may meet, the harm threshold and must be managed under the school's procedures for allegations against adults.
4. Another process, such as disciplinary, capability, grievance or professional support procedures, should also be considered.

If at any stage information indicates that a child may be at immediate risk of harm, appropriate safeguarding action will be taken **without waiting for the low-level concerns process to be completed**.

8. Acting on concerns

Where the behaviour is consistent with expected standards

Where, following consideration, the Headteacher concludes that the behaviour is consistent with the Staff Code of Conduct and the law, this conclusion and the reasons for it will be recorded.

Where appropriate, the Headteacher may discuss the circumstances with the adult concerned to avoid future misunderstandings or provide clarification about expected professional practice.

Where appropriate, feedback will also be provided to the person who raised the concern, while maintaining appropriate confidentiality.

The fact that a concern was not substantiated or was found to have an appropriate explanation **must not discourage staff from reporting future concerns**.

Where the concern is low-level

Where a concern is determined to be low-level, the school's response will be **appropriate, proportionate and sensitive to the circumstances**.

Action may include:

- A discussion with the adult concerned.
- Clarification or reinforcement of professional expectations and boundaries.



- Advice, guidance, mentoring or increased supervision.
- Additional training.
- Review of working practices or arrangements.
- An agreed action plan or monitoring arrangements.
- Pastoral or safeguarding support for any child affected.
- Consideration of whether disciplinary or other employment procedures are appropriate.

The adult concerned will normally be given an opportunity to respond to the concern and provide relevant contextual information.

A low-level concern **does not automatically result in disciplinary action**. However, apparently low-level behaviour may justify disciplinary action where it breaches the Staff Code of Conduct or other professional expectations. Repeated concerns or failure to respond to advice, guidance or previous action may also require further action.

Where the concern meets or may meet the harm threshold

If the Headteacher determines at any stage that the concern meets, or may meet, the harm threshold, the low-level concerns procedure will cease to be the primary process and the concern will be managed under the school's procedures for **allegations against adults working in or on behalf of the school**.

The LADO will be contacted in accordance with those procedures.

9. Recording and reviewing low-level concerns

All low-level concerns will be **recorded in writing**.

Records will include:

- A clear summary of the concern.
- The context in which it arose.
- The name of the person raising the concern, unless anonymity has been requested and can reasonably be maintained.
- Relevant information obtained when considering the concern.
- Action taken.
- Decisions reached and the rationale for those decisions.
- The outcome of the concern and any subsequent action or review.

Records will be **confidential, held securely and managed in accordance with the Data Protection Act 2018, UK GDPR and the school's data protection and records-management arrangements**.

The school will determine an appropriate secure location for low-level concern records. Low-level concern records **do not have to be kept on the individual's personnel file**. Where a concern also results in disciplinary or other



employment action, relevant records will be retained in accordance with the applicable employment and records-management procedures.

Low-level concern records will be reviewed periodically so that potential **patterns of inappropriate, problematic or concerning behaviour** can be identified.

Where a pattern is identified, the Headteacher will consider an appropriate course of action. This may include further support, supervision, training or disciplinary action. Where a pattern indicates that the harm threshold may have been met, the matter will be managed under the allegations procedure and the LADO will be consulted.

The school will also consider whether patterns of concerns identify **wider cultural issues** or weaknesses in policies, training, supervision or working practices and will take appropriate action.

Low-level concern records will be retained **at least until the individual leaves the school's employment or engagement**, subject to the school's records-retention arrangements and any requirement to retain information for longer.

References

Low-level concerns will **not normally be included in employment references** unless they relate to matters which meet the harm threshold for inclusion or have otherwise resulted in information which should lawfully and fairly be included in accordance with current statutory guidance.

Substantiated safeguarding concerns or allegations which meet the harm threshold will be included in references where required by current statutory guidance.

Concerns or allegations which are **false, unfounded, unsubstantiated or malicious will not be included** in employer references.

Where necessary, the Headteacher will seek appropriate HR or legal advice when preparing a reference involving safeguarding information.

10. Monitoring and review

The Headteacher and DSL will keep the effectiveness of the school's low-level concerns arrangements under review.

This will include consideration of:

- Whether staff understand professional boundaries and expected standards of conduct.
- Whether staff feel confident to report and self-report concerns.
- The effectiveness and consistency of reporting and recording arrangements.
- Patterns or themes arising from low-level concerns.
- Whether concerns indicate wider cultural, policy, training, supervision or practice issues.
- Whether changes are required following updated statutory guidance, local safeguarding procedures or learning from safeguarding cases.

This appendix will be reviewed **at least annually**, alongside the Child Protection and Safeguarding Policy, and sooner where changes to legislation, statutory guidance, local procedures or safeguarding learning make this necessary.