



Take 2 Cornwall

SAFEGUARDING AND CHILD PROTECTION POLICY

Safeguarding Statement

At Take 2 Cornwall, we respect and value all children and are committed to providing a safe, welcoming and nurturing environment where every young person can learn and thrive. We believe every child has the right to participate fully within Take 2 Cornwall, free from harm, neglect, abuse and discrimination.

Safeguarding and promoting the welfare of children is a legal responsibility shared by every adult working or volunteering in Take 2 Cornwall, including staff, contractors and visitors. We are committed to a culture of vigilance where the best interests of the child come first, and where Early Help, Family Help and timely intervention prevent harm from occurring.

In line with Keeping Children Safe in Education, our policies and practice aim to protect children from all forms of abuse and neglect, including physical abuse, sexual abuse, emotional abuse, neglect, child-on-child abuse, exploitation (including criminal and sexual exploitation), technology-assisted abuse (including AI-generated or digitally manipulated sexual imagery), online abuse, serious violence, and exposure to extremist or harmful ideological views. We recognise that safeguarding risks may occur both within the home and in extra-familial contexts, including schools, peer groups, neighbourhoods and online environments. We work in partnership with the young person, parents, carers and other agencies to ensure that every child feels safe, supported and able to achieve their full potential.

Our safeguarding practice is child-centred, anti-discriminatory and anti-racist. We recognise that children may experience harm differently depending on their background, identity, needs or circumstances. We are committed to ensuring that safeguarding responses actively consider equality, diversity and inclusion and challenge discrimination, prejudice and bias. Staff understand that racism, discrimination, poverty, disability, language barriers, culture, faith and lived experience may affect how abuse is experienced, identified and responded to.

This policy will be reviewed **annually**.

Important contacts for this policy

Role/organisation	Name	Contact details
Designated safeguarding lead (DSL)	Bruce Paton	07983 595714 brucepaton@take-2-cornwall.co.uk
Deputy DSL(s)	Gareth Price	07506136092 garethprice@take-2-cornwall.co.uk
	Paula Atkinson	07432084786 paulaatkinson@take-2-cornwall.co.uk
	Heather James	07506136086 heatherjames@take-2-cornwall.co.uk
	Lewis Stritch	07936 324860 lewisstritch@take-2-cornwall.co.uk
Local Authority Designated Officer (LADO)		01872 326536
DfE Prevent helpline		020 7340 7264
Local Authority Prevent Co-ordinator	Steve Rowell MICJP	

Aims

Take 2 Cornwall aims to:

- Ensure all appropriate action to safeguard and promote children's welfare is undertaken promptly
- Ensure that all staff are fully up-to-date and aware of their statutory responsibilities concerning safeguarding and child protection

- Ensure that all staff have up-to-date and comprehensive training in recognising and reporting safeguarding and child protection issues
- Ensure all staff understand their responsibility to safeguard themselves and their colleagues and are informed and trained.
- Ensure safeguarding practice reflects the Family Help framework and promotes integrated working across education, health, children's social care and other partners to improve outcomes for children and families.

Legislation and statutory guidance

This policy is written with due regard to the following statutory guidance:

- DfE statutory guidance [Keeping Children Safe in Education](#)
- DfE statutory guidance [Working Together to Safeguard Children](#)

Take 2 Cornwall complies with this guidance and the agreed arrangements published by our local safeguarding partnership.

The following legislation also applies to this policy:

- Section 175 of the [Education Act 2002](#)- placing a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#)- sets out the single central record's contents and the requirement for training in safer recruitment techniques for at least one person on an interview panel.
- [The Children Act 1989](#) (and [2004 amendment](#))- provides the 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](#)- places a statutory duty on staff to report to the police where they discover that FGM appears to have been carried out on a girl under 18." ('suspected' is covered in wider safeguarding duties, but the mandatory reporting duty is only for known cases, not suspicions).
- [Statutory guidance on FGM](#) - sets out responsibilities concerning the safeguarding and supporting of FGM victims.

- [The Rehabilitation of Offenders Act 1974](#)- sets out when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#)- defines ‘regulated activity’ about children
- [Statutory guidance on the Prevent duty](#)- explains providers’ duties to protect people at risk of radicalisation and extremism under the Counter-Terrorism and Security Act 2015
- [The Equality Act 2010](#) clarifies that it is unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).
- [The Public Sector Equality Duty \(PSED\)](#)- the need to have due regard to eliminating unlawful discrimination, harassment and victimisation.
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#)- sets out who is disqualified from working with children
- [Online Safety Act - GOV.UK](#)- establishes duties on online platforms to reduce children’s exposure to harmful content and strengthens safeguarding responses to online abuse and exploitation.
- [Education and Inspections Act 2006](#)- includes the duty to promote the safety and well-being of pupils and powers relating to behaviour.
- [Human Rights Act 1998](#)- underpinning right to life, privacy, and protection from degrading treatment.

Statement for equality of access

Take 2 Cornwall recognises an increased risk of abuse for some children and additional barriers for others regarding recognising or disclosing abuse. Therefore, Take 2 Cornwall is committed to identifying children’s diverse circumstances and giving them the same protection, regardless of any barriers they may face.

In response to the above, Take 2 Cornwall will pay particular attention to children who have the following:

- SEND or health conditions, including suspected or known mental health conditions (see the Children with SEND, disabilities, medical conditions or allergies section)
- Young carer responsibilities
- Protected characteristics and may face discrimination due to their race, ethnicity, religion, gender identification or sexuality
- English as an additional language or are new to English
- Difficult home situations
- Increased risk of forced marriage, radicalisation, FGM or sexual exploitation
- Asylum status
- Children living in kinship care arrangements
- Children experiencing poverty, housing insecurity or family instability
- Children who may be affected by discrimination, racism, exclusion or marginalisation
- Unborn children where pre-birth safeguarding concerns are identified
- Increased risk due to mental health needs, either their own or a family member
- Looked after or previously looked after status (see the [Looked-after or previously looked-after children](#) section)
- Been missing from education
- Possible risks related to home-education
- Increased risk of becoming involved in anti-social or criminal behaviour, including gangs, county lines or other contextual safeguarding situations
- Increased risk of trafficking, modern slavery or sexual or criminal exploitation
- A family member who is known to be an offender or is in prison currently

Roles and responsibilities

This policy applies to all staff and volunteers as safeguarding is everyone's responsibility. It also applies to off-site activities, work experience placements, and the work of visitors and contractors.



All staff must:

- Read and understand *Keeping Children Safe in Education* (Part 1) annually, and whenever updated, confirming their understanding through the SSS CPD certified training process.
- Follow all Take 2 Cornwall safeguarding policies and procedures, including:
- Safeguarding and Child Protection Policy
- Staff Code of Conduct / Behaviour Policy
- Behaviour Policy
- Online Safety Policy
- Know the identity and role of the Designated Safeguarding Lead (DSL), Deputy DSLs (DDSLs), and Designated Mental Health Lead (DMHL).
- Maintain awareness of and follow HM Government guidance on *Searching, Screening and Confiscation*.

In their safeguarding practice, all staff must:

- Identify children who may need help or protection and act immediately, following Take 2 Cornwall procedures.
- Understand the Early Help and Family Help process and their role in identifying emerging needs, liaising with the DSL, and sharing relevant information with other professionals.
- Understand the Family Help framework and the role of education professionals in identifying children who may benefit from community-based support, targeted Early Help and Family Help assessments.
- Know how to make a referral to local authority children's social care and their role in any subsequent statutory assessments.
- Recognise the signs of abuse and neglect, including specific safeguarding issues such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), serious violence indicators (including county lines), FGM, radicalisation, domestic abuse, and trafficking.
- Maintain confidentiality in all safeguarding matters and know how to respond appropriately to a disclosure.

- Provide a safe, supportive environment for all children, including LGBTQ+ young people and those with protected characteristics, enabling them to speak out without fear of prejudice or discrimination.
- Reassure victims that they will be taken seriously, kept safe, and supported appropriately.
- Understand that safeguarding risks can occur anywhere – at school, online, at home, and in the wider community – and respond accordingly.
- Understand that safeguarding includes recognising patterns of harm across peer groups, locations and online environments in line with contextual safeguarding approaches.
- Challenge poor safeguarding practice and know how to raise concerns through the Take 2 Cornwall's whistleblowing procedures.
- Understand how safeguarding vulnerabilities may arise from unmet medical needs, allergies, disabilities or mental health needs, and know how to escalate concerns where a child's health or medical condition creates risk of harm.

The [Training](#) section and [Appendix 4](#) of this policy outline in more detail how staff are supported to do this.

All staff will be made aware of and are required to adhere to the HM Government guidance: [Searching, screening and confiscation in schools - GOV.UK](#).

Role and responsibilities of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead/s (DDSL)

The DSL in Take 2 Cornwall is Bruce Paton. They are a member of the senior leadership team (SLT). The DSL is responsible for child protection and wider safeguarding in Take 2 Cornwall.

The DSL is available during Take 2 Cornwall working hours for staff to discuss safeguarding concerns.

E-mail: safeguarding@take-2-cornwall.co.uk

Take 2 Designated Safeguarding Lead is Bruce Paton 07983 595714 brucepaton@take-2-cornwall.co.uk

Take 2 Deputy Safeguarding Lead Gareth Price 07506136092 garethprice@take-2-cornwall.co.uk



Take 2 Deputy Safeguarding Lead Paula Atkinson 07432084786
paulaatkinson@take-2-cornwall.co.uk

Take 2 Deputy Safeguarding Lead Heather James 07506136086
heatherjames@take-2-cornwall.co.uk

Take 2 Deputy Safeguarding Lead Lewis Stritch 07936 324860 lewisstritch@take-2-cornwall.co.uk

The Deputy DSL/s will act as cover in the absence or unavailability of the DSL. In line with KCSIE 2026, the school ensures that all DDSLs are trained and have the required skills to fully undertake the role of DSL in their absence.

Core responsibilities (in line with current Department for Education statutory guidance on safeguarding):

1. Case Management

- Take lead responsibility for safeguarding and child protection across Take 2 Cornwall.
- Make referrals to local authority children's social care, the Channel programme, the police, the Disclosure and Barring Service (DBS), and other relevant agencies, and support staff to make referrals directly where appropriate.
- Attend and contribute to strategy meetings, case conferences, core groups, and other inter-agency meetings.
- Maintain accurate, detailed, and secure child protection records.

2. Policy, Training, and Awareness

- Ensure all staff are aware of safeguarding policies, procedures, and their responsibilities.
- Lead on the induction and ongoing safeguarding training of all staff, in accordance with current statutory guidance.
- Work with the Take 2 Cornwall Director and Safeguarding Team to ensure the safeguarding policy is reviewed annually, and that procedures remain in line with national and local requirements.

3. Partnership Working

- Liaise with the safeguarding team on safeguarding matters.

- Work collaboratively with local authority case managers, social workers, police, and other safeguarding partners.
- Be aware of local specialist support for children affected by sexual violence and sexual harassment, both victims and alleged perpetrators.
- Understand the role of the 'appropriate adult' in police processes and ensure this is provided when needed.

4. Risk Management and Technical Safeguarding

- Understand safeguarding risks including harmful sexual behaviour, child-on-child abuse, exploitation, radicalisation, domestic abuse, and other contextual safeguarding concerns.
- Work with IT staff and providers to ensure effective filtering, monitoring, and data security, in line with DfE standards.
- Oversee safeguarding aspects of the single central record (SCR) and safer recruitment processes.

5. Support and Resources

- Ensure sufficient time, funding, training, and resources are available to fulfil the role effectively.
- Support and advise staff on safeguarding concerns, ensuring children receive appropriate help as quickly as possible.

Reviews and support

A review is the opportunity to talk through and reflect upon daily practice. A DSL needs to receive this to alleviate the emotional impact when dealing with safeguarding concerns.

Supervision sessions include:

- Workload reviews
- Discussion of any issues in the workplace or practices
- Identification and celebration of achievements
- Discussion about well-being and work-life balance
- Supportive and constructive challenge

The DSL must seek help immediately if they feel unsafe or are struggling to cope.



The management team regularly provide support for each other and the whole staff group, and review and reflect on safeguarding throughout Take 2 Cornwall.

Role and Responsibilities of the Director

In addition to the responsibility for implementing this policy, the Director is also responsible for:

- Ensuring all permanent and temporary staff and volunteers:
 - o Receive induction, which includes information on Take 2 Cornwall's systems that support safeguarding, and this policy
 - o Have a clear understanding of and can follow the procedures in this policy, most particularly those associated with referrals of suspected abuse and neglect cases
- Ensuring this policy is effectively communicated to parents/carers via the website, as well as when their child first starts with Take 2 Cornwall.
- Ensuring that the DSL has appropriate time, funding, training and resources, and adequate cover is in place in the absence of the DSL
- Ensuring that all staff receive regular, appropriate and up-to-date child protection and safeguarding training
- Ensuring they act as the 'case manager' when an allegation of abuse is made against a member of staff or volunteer, where appropriate (see [Appendix 3](#))
- Ensuring decisions are made regarding all low-level concerns in collaboration with the DSL
- Carrying out duties related to data management, particularly those specified within the DFE filtering and monitoring requirements
- Ensuring all statutory staffing ratios are met
- Ensuring the assignment of a key person for each child in the Early Years Foundation Stage

Confidentiality

Take 2 Cornwall's approach to confidentiality will be guided by the following:

- For safeguarding to be effective, information must be shared promptly

- The need to keep children safe and protect them from harm may override duties of confidentiality and data protection considerations. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information where failure to do so would place a child at risk of harm.
- Where special category personal data needs to be shared for safeguarding purposes, the Data Protection Act 2018 provides a safeguarding condition that allows information to be shared without consent where it is necessary to protect a child or another individual at risk. Staff should seek advice from the DSL where appropriate, but a lack of consent must not prevent information sharing when a child is at risk of harm.
- Staff must never promise children to keep secrets upon a disclosure, as this may not be in the child's best interests
- Where a victim of sexual violence or sexual harassment requests that Take 2 Cornwall does not tell anyone about the incident, the Designated Safeguarding Lead (DSL) must carefully consider the victim's wishes alongside the Take 2 Cornwall's safeguarding responsibilities, including the safety and welfare of the victim and other children. The DSL should explain to the victim that, whilst their wishes will be respected wherever possible, Take 2 Cornwall may need to share information with other professionals where there is a safeguarding concern, a risk of harm, or where sharing information is necessary to protect the victim or others.
- Information may still be shared lawfully if there is another UK GDPR legal basis, even without consent.
- The DSL must balance the duty to protect the victim and other children against the victim's wishes.
- Parents/carers will usually be informed unless this puts the victim at further risk.
- The basic safeguarding principle applies: if a child is at risk of harm, in immediate danger, or has been harmed, a referral must be made to local authority children's social care.
- Rape, assault by penetration and sexual assault are serious criminal offences. Where a report of this nature is made, the DSL should consider, with the victim and their parents/carers where appropriate, whether a report to the police is required. If a child is at risk of harm, is in immediate danger, or has suffered

significant harm, children's social care and/or the police should be informed without delay.

With regard to anonymity, all staff will:

- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, have a general awareness of anonymity, witness support and the criminal process
- Protect the anonymity of any children involved in any report of sexual violence or sexual harassment as far as they reasonably can
- Be aware of any potential social media impact which may expose a victim's identity and spread rumours
- Follow the information-sharing principles set out in Working Together to Safeguard Children 2026, the Data Protection Act 2018 and UK GDPR when making decisions about sharing information.
- Speak to the DSL or DDSs if they are in any doubt about sharing information

Information sharing will follow the principles set out in Working Together to Safeguard Children 2026, recognising that effective safeguarding depends on timely, accurate and proportionate information sharing between professionals and agencies to safeguard and promote the welfare of children.

Recognising abuse and taking action

In the event of a safeguarding issue, all staff and volunteers must follow the following procedures.

Where a child is suffering or may suffer harm or is in immediate danger
If a child is believed to be in immediate danger, suffering, or maybe suffering from harm, then an **immediate** referral must be made to children's social care and/or the police. Anyone can make a referral.

Where a referral has been made directly, the DSL (or DDSs) must be told as soon as possible. (See section [The designated safeguarding lead](#))

Social Care: 0300 1234 131

Social Care out of hours contact: 01208 251300

LADO (Local Authority Designated Officer): 01872 326536



Cornwall Council and the Isles of Scilly the clinical commissioning group for the area Kernow CCG

Local Authority Prevent Co-ordinator: Local Authority Prevent Co-ordinator Steve Rowell MICJP

Police: 101 (non-emergency) or 999 (emergency)

Anti-terrorist hotline: 0800 789 321

NSPCC: 0808 800 500

Ofsted: 0300 123 1231

<https://www.gov.uk/report-child-abuse-to-local-council>

Where a child makes a disclosure

- If a child makes a disclosure of abuse, neglect, or exploitation, staff must:
- Give them time to talk by listening, believing, and not asking leading questions
- Remain calm and do not show any upset or shock
- Acknowledge that by telling you, they have done the right thing
- Do not promise to keep it a secret; clearly explain that you will have to pass this information on and what will happen next
- Record in writing verbatim as soon as reasonably possible, non-judgementally and facts only. Sign and date
- Give a written record to DSL or, where appropriate or necessary, make a referral to children's social care and/or the police directly, informing the DSL as soon as possible that you have done so. Apart from the DSL or relevant authorities, keep all details confidential unless told to do otherwise by a relevant authority involved in the safeguarding process

It is important to note that children:

- May not know how or feel ready to tell anyone about their abuse, neglect or exploitation
- May not know or recognise that their experiences are harmful
- May feel humiliated, embarrassed or threatened due to their disability, language barriers, sexual orientation or other vulnerabilities

If you have any concerns about a child, talk to the DSL.

On discovery that FGM has taken place or there is a risk of FGM

Keeping Children Safe in Education defines FGM as “all procedures involving partial or total removal of the external female genitalia, or other injuries to the female genital organs”.

Also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’, FGM is illegal in the UK, a form of child abuse with long-lasting, harmful consequences.

See Appendix 4 for possible indicators that a pupil has already been subjected to FGM and factors that indicate a pupil may be at risk.

Known cases (mandatory duty)

Under section 5B of the Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015), where an Intervention Support Worker (in lieu of the teacher) in England or Wales:

- Is informed by a girl under 18 that she has had FGM carried out on her; or
- Observes physical signs which appear to show that FGM has been carried out on a girl under 18, and has no reason to believe it was necessary for her physical or mental health, or for purposes connected with labour or birth, they **must** report it personally to the police via 101 (or 999 if there is immediate risk) as soon as possible. This is a **statutory and mandatory duty**. Failure to meet it may result in disciplinary action.

The case should also be discussed with the DSL, and children’s social care should be involved, unless there is a specific instruction not to share the information.

At risk or suspected cases

Where FGM is suspected or a girl is at risk – but it is not known to have been carried out – the mandatory reporting duty does not apply. In these cases:

- All staff must speak to the DSL immediately.
- The DSL will follow local safeguarding procedures and decide on referral to children’s social care.

Important

- Staff must never physically examine a pupil.



- All staff should familiarise themselves with the *Multi-agency statutory guidance on female genital mutilation* (HM Government, updated 2023).

In case of concern contact Cornwall Council, MARU/MASH 0300 123 1116.

www.swcpp-cornwallscilly.trixonline.co.uk

Predictive safeguarding

Take 2 Cornwall recognises that safeguarding action should not be delayed until harm has occurred. Staff should be alert to indicators of intent, planning, preparation, threats, online activity, concerning communications, weapon-seeking behaviour, or other behaviours suggesting that a child may be at risk of harming themselves or others. Concerns about potential future harm must be reported to the DSL in the same way as concerns about actual harm.

Where there are concerns about a child (other than suffering or likely to suffer from harm or is in immediate danger)

Follow the procedure in [Figure 1](#) where there are concerns about a child's welfare.

Speak to the DSL to agree on a course of action.

If the DSL or DDSLs are not available, there should be no delay in taking appropriate action. This includes:

- Talking to a senior leader
- Taking advice from the local authority on children's social care ¹
- Sharing the details of any actions taken with the DSL as soon as possible
- Making a referral to local authority children's social care directly, if appropriate, sharing any action taken with the DSL as soon as possible

Early Help and Family Help

Where appropriate, children and families may benefit from coordinated support through community-based Early Help or the Family Help framework. Family Help brings together targeted Early Help and Family Help and section 17 support into a more integrated multi-disciplinary response.

¹ Advice is also available by contacting the NSPCC helpline on 0808 800 5000



The DSL will normally coordinate referrals for Family Help assessments where a child:

- has emerging safeguarding concerns
- requires multi-agency support
- has unmet needs affecting welfare, attendance, wellbeing or safety
- may be at risk of escalation to statutory intervention

Staff may be asked to contribute to Family Help assessments, planning meetings or Team Around the Family arrangements.

In line with Working Together 2026, practitioners should consider the needs of unborn children where there are safeguarding concerns affecting parents or carers during pregnancy.

- Local procedures for Early Help and Family Help assessments are through Cornwall Council; <https://ciossafeguarding.org>

Referral

Where there is a need to refer the case to local authority children's social care or the police, the DSL will usually make the referral or support you to do so.

Where this is not possible and a direct referral is made, the DSL must be informed immediately.

The local authority must decide within 1 working day of a referral about what course of action to take. They must inform the referrer of the outcome. If this information has not been received, there must be a prompt follow-up with the local authority by the DSL or referrer to ensure outcomes are properly recorded.

Following a referral, if there does not seem to be an improvement in the child's situation, then the DSL or referrer must follow local escalation procedures, ensuring concerns and an improvement in the child's situation have been addressed.

Referral and escalation procedures - contact MARU 0300 123 1116

Where there are concerns about extremism

Where there are concerns that a child may be vulnerable to radicalisation or extremism, but is not in immediate danger or at risk of significant harm, staff should speak to the DSL without delay to agree a course of action.

If the DSL or DDSLs are not available, there should be no delay in taking appropriate action. This may include:

- Talking to a senior leader
- Taking advice from the local authority e.g. Prevent / Channel Lead
- Sharing the details of any actions taken with the DSL as soon as possible
- Making a referral to local authority children's social care directly, if appropriate, sharing any action taken with the DSL as soon as possible

The DSL will assess the nature and level of risk and determine the most appropriate referral pathway. This may include:

- Local authority children's social care team
- Local Prevent processes and, where appropriate, the Channel programme, which provides voluntary support for individuals at risk of being drawn into terrorism.
- Seeking advice from the DfE dedicated helpline 020 7340 7264
- Emailing counter.extremism@education.gov.uk. (N.B. not for use in emergencies).

The situation would be classed as an emergency if:

- Someone is in immediate danger
- Someone may be planning to travel to join an extremist group
- Something is seen or heard that may be terrorist-related

In these cases, call 999 or the confidential anti-terrorist hotline on 0800 789 321

Where there is a mental health concern

Mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, exploitation or other forms of harm.

Any behavioural indicators, changes in presentation, attendance, engagement or emotional wellbeing that suggest a child may be experiencing mental health difficulties should prompt staff to consider whether safeguarding concerns may also be present.



Immediate action should be taken if there is a mental health concern about a child that is also a safeguarding concern. This action should include input from a DSL and the DMHL.

Urgent cases that present a risk to the child's safety or life may also require contacting emergency services or the local NHS mental health crisis team.

Staff recognise that mental health needs may both indicate safeguarding risk and create vulnerability to harm, including exploitation, bullying or abuse. The Designated Safeguarding Lead works alongside the Designated Mental Health Lead to ensure early identification, timely support and appropriate referral pathways.

Concerns about a member of staff (including supply teacher, volunteer or contractor)

Staff should speak to the General Manager or member of the Management Team as soon as possible regarding any concerns about a staff member (including volunteer or contractor or supporting staff from schools) or if an allegation is made about a member of staff (including volunteer or contractor or supporting staff from schools) who may pose a risk of harm to children. Where the concern or allegation concerns the Director, the General Manager must be spoken to.

See Appendix 3 for the procedure the General Manager/Director will follow.

Where there is deemed to be a conflict of interest in reporting a concern or allegation about a staff member (including volunteer or contractor or supporting staff from schools) to the Director, concerns should be reported directly to the local authority designated officer (LADO).

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

Take 2 Cornwall recognises that children can abuse other children. Child-on-child abuse can take many forms and may occur both inside and outside of school, including online. Such abuse will never be tolerated, dismissed as banter, part of growing up, or accepted as a normal part of children's relationships.

While some incidents between pupils may be managed through Take 2 Cornwall's Behaviour Policy, safeguarding procedures will be followed where the behaviour raises a safeguarding concern. Where allegations of a safeguarding concern are raised, this Child Protection and Safeguarding policy will apply, such as alleged behaviour that is:

- Potentially a criminal offence and/or serious
- A risk to pupils in the school/ Take 2 Cornwall
- Violent
- Involving pupils being forced or incited to use drugs or alcohol
- Involving sexual violence, sexual harassment, sexual abuse, exploitation, coercive or controlling behaviour, upskirting, indecent exposure, sexual

assault, technology-assisted harmful sexual behaviour, AI-generated sexual imagery, deepfake imagery, nudification, or the sharing of nude, semi-nude or sexually explicit images and/or videos.

For more information about child-on-child abuse, see [Appendix 4](#).

Child-on-child abuse procedures

Where an allegation of abuse is made against another pupil, the following action will be taken:

- Staff will inform the DSL, or their deputy, immediately and record the allegation. It is not the duty of staff to investigate
- The DSL will assess the nature of the allegation and determine the most appropriate course of action, which will include consultation with the education provision which has over-arching responsibility for the young person supported by Take 2 Cornwall, or referral to children's social care, the police or other relevant agencies.
- Where a potential criminal offence has been alleged, the DSL will contact the police
- A risk assessment and support plan will be put in place by the DSL for all children involved (victim, perpetrator, and any others affected) with a named person they can talk to if needed.
- Where appropriate, the Senior Mental Health Lead (SMHL) will be informed and liaise with the education provision which has over-arching responsibility.
- All information will be treated confidentially and only shared with those who need to know to protect the children involved.

Minimising the risk of child-on-child abuse

Take 2 Cornwall recognises the need to create a supportive environment and gives victims the confidence to report any child-on-child abuse incidents.

Take 2 Cornwall will proactively achieve this by:

- Educating children about respectful relationships, consent, and appropriate behaviour through liaising with the education provision which has over-arching responsibility for the young person supported by Take 2 Cornwall.
- Providing a clear and accessible reporting system for young people.

- Challenging derogatory, prejudicial, sexualised or inappropriate behaviour, including inappropriate language, requests for sexual images, online sexual harassment, technology-assisted harmful sexual behaviour, and the creation or sharing of AI-generated sexual imagery.
- Being alert to gender-based harm, sexual harassment, sexual violence, misogynistic attitudes, unwanted touching, harmful sexual behaviours, homophobic, biphobic and transphobic language, and other forms of prejudice-based abuse.
- Reassuring children that reports will be taken seriously.
- Monitoring and reviewing all reports of sexual harassment and/or violence to ensure policies, procedures, and curriculum are effective.
- Ensuring all victims, alleged perpetrators, or witnesses of sexual violence (particularly rape or assault by penetration) are supported and protected from bullying or harassment.
- Considering support for siblings or other family members where necessary.
- Promoting a culture of respect, inclusion and equality where abusive behaviour is challenged and never accepted as normal.

Staff Training

All staff will:

- Recognise the indicators and signs of child-on-child abuse, including online abuse.
- Understand that child-on-child abuse can happen in any school/provision, even if there have been no previous reports.
- Act immediately if they have any concerns, including making a direct report where necessary.
- Be aware of additional barriers that may prevent some children from disclosing abuse, including those related to disability, SEND, gender, ethnicity, sexual orientation, language, culture or other vulnerabilities.
- Understand that a child who harms another child may also have experienced abuse, trauma or other adverse experiences and may require safeguarding support.

- Recognise the role of social media, online platforms and digital technology in facilitating, escalating or prolonging abuse.
- Recognise technology-assisted harmful sexual behaviour, including the creation, possession or sharing of AI-generated sexual imagery, deepfake content, nudification imagery and other forms of online sexual abuse.
- Understand the continuum of harmful behaviour, including sexual harassment, misogynistic attitudes, prejudice-based abuse and harmful online behaviours, and challenge these appropriately.
- Speak to the DSL or DDSL immediately if they have any concerns.

Disciplinary Action

- Take 2 Cornwall will ensure that appropriate safeguarding and intervention/pastoral support is provided to all children involved alongside any disciplinary action.
- Take 2 Cornwall may take disciplinary action in accordance with its Behaviour Policy while external investigations by the police, children's social care or other agencies are ongoing.
- Take 2 Cornwall will consider each on a case-by-case basis and take into account whether:
 - o Any action taken would prejudice an investigation and/or subsequent prosecution, determining this by liaising with the police and/or local authority children's social care
 - o The circumstances render it unreasonable or irrational for Take 2 Cornwall to conclude what happened whilst there is an ongoing independent investigation

Sharing of Nude, Semi-Nude and Sexually Explicit Images, Videos and AI-Generated Content

The following approach is based on HM Government advice <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people> and current safeguarding guidance, including KCSIE, for all staff including DSLs and senior leaders.

This section applies to self-generated intimate images and/or videos, nude or semi-nude images, sexually explicit content, and AI-generated sexual imagery, including deepfake and nudification images.

Responsibilities when responding to an incident

If staff become aware of an incident involving the consensual or non-consensual creation, possession or sharing of nude, semi-nude or sexually explicit images and/or videos, they must:

- Immediately report it to the DSL.
- Never intentionally view, copy, print, share, save or forward the imagery, or ask a child to share, download or upload it – this may be a criminal offence. If imagery is accidentally viewed, it must be reported to the DSL and support sought.
- Not delete the imagery or ask the child to delete it.
- Not investigate the incident or question children beyond establishing the basic facts needed to make a referral.
- Not share information about the incident with other staff, children, or parents/carers, except on a need-to-know basis.
- Avoid any language or behaviour that blames, shames or criminalises the young people involved.

Explain that the incident must be reported in order to keep children safe and reassure those involved that they will be supported appropriately.

The DSL will manage the incident in accordance with national guidance, including determining whether the imagery needs to be viewed, whether external agencies should be involved, and what support should be provided to all children affected.

Initial Review

Following a report, the DSL will undertake an initial review, involving other appropriate safeguarding staff where necessary. This meeting will:

- Assess immediate risk to children.
- Decide whether a referral to the police and/or children's social care is needed.
- Decide whether parents/carers will be informed (unless this may increase risk).

- Determine whether it is necessary and proportionate to view the imagery. Imagery will only be viewed where there is no alternative way to establish the facts required to safeguard the child or children involved.
- Identify the extent of sharing (if known).
- Determine what action is required to remove, report or secure the deletion of imagery from devices, online platforms or websites.
- Identify relevant information about the children involved that may influence the risk assessment and safeguarding response.
- Consider whether any AI-generated sexual imagery, deepfake imagery or nudification imagery is involved.
- Consider contacting other schools, settings, or individuals if necessary.

Referral to Children's Social Care and/or the Police

A decision to make a referral will be determined by whether:

- An adult is involved.
- There is suspected blackmail, grooming, coercion, or concerns about capacity to consent.
- The imagery depicts sexual acts which are violent or unusual for the child's age.
- The imagery involves any sexual acts by a pupil under 13.
- There are concerns that a child is at risk of significant harm, including suicide, self-harm, exploitation or abuse.

Where a decision is made not to involve children's social care or the police, the rationale for this decision will be clearly recorded. If new information emerges or risks escalate, the DSL will review the decision and make a referral where appropriate.

Referrals to the police will be made in accordance with local safeguarding arrangements and police referral procedures.

Where a child becomes involved in a police investigation, Take 2 Cornwall will work with parents, carers, social care and the police to ensure that an appropriate adult is available where required under the Police and Criminal Evidence Act 1984 (PACE).



Recording incidents

All incidents involving the creation, possession or sharing of nude, semi-nude or sexually explicit images and/or videos, including AI-generated sexual imagery where relevant, and all decisions made in response to such incidents, will be recorded in accordance with the school's [Record Keeping](#) section of this policy.

Records will include the nature of the concern, actions taken, decisions reached, the rationale for those decisions, any referrals made, support provided, and the outcome of the incident. Records will be stored securely, treated as confidential safeguarding records, and shared only on a need-to-know basis.

Curriculum coverage

Take 2 Cornwall liaise with the education provision which has over-arching responsibility for the young person supported by Take 2 Cornwall, to enable the children to:

- Recognise pressure, coercion, manipulation and exploitation.
- Refuse requests for intimate images.
- Respond safely if they receive intimate images or videos.
- Support peers appropriately and report concerns to a trusted adult.
- Make safe and responsible decisions when using digital technology and online platforms.

Take 2 Cornwall ensures that pupils understand how concerns can be reported and the support available if an incident occurs. Age-appropriate information about Take 2 Cornwall's safeguarding procedures is shared with children as part of the provision and wider safeguarding programme.

Reporting systems for our young people

Take 2 Cornwall will consider the child's feelings and wishes when there is a safeguarding concern and when determining what action to take and what services to provide.

Take 2 Cornwall recognises how important it is to ensure children feel safe and comfortable in coming forward to report any concerns and/or allegations. Young people are encouraged to speak to any member of staff they trust and can report concerns to the Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Lead (DDSL), or trusted adult within Take 2 Cornwall.



Therefore, to achieve this, Take 2 Cornwall will:

- Ensure children can confidently report abuse by putting appropriate systems in place
- Ensure our reporting systems are easily accessible for children, easily understood and promoted well to all
- Ensure all concerns are taken seriously and children can safely express their views and give feedback

Take 2 Cornwall will regularly review the effectiveness of its reporting systems and seek pupil feedback to ensure children feel safe, supported and confident to raise concerns.

Online safety and the use of mobile technology

Our child protection and safeguarding policy reflects our approach to online safety and the safe use of mobile and smart technology. For detailed processes, see our standalone Online Safety Policy, Mobile Phone Policy, Acceptable Use agreements and Behaviour Policy.

Take 2 Cornwall recognises that technology is a significant part of children's lives and that online activity can both support learning and create safeguarding risks. We also recognise emerging risks associated with generative artificial intelligence (AI), deepfake imagery, nudification tools, online exploitation and technology-assisted harmful sexual behaviour.

Take 2 Cornwall is committed to protecting children from harmful and inappropriate online content and ensuring that all members of the Take 2 Cornwall community use technology safely, responsibly and respectfully.

Our approach is informed by current statutory guidance (Keeping Children Safe in Education) and relevant legislation, including the Online Safety Act 2023, the Data Protection Act 2018, the Equality Act 2010 and the Crime and Policing Act 2026.

Therefore, Take 2 Cornwall will:

- Ensure robust processes are in place to protect the online safety of children, staff and volunteers

- Ensure the safe and responsible use of technology, including generative AI tools, chatbots and image-generation platforms by protecting and educating the whole Take 2 Cornwall community
- Ensure the whole Take 2 Cornwall community have clear guidelines for the use of mobile phones and other digital equipment
- Ensure effective filtering and monitoring systems which are regularly reviewed (at least annually) and capable of identifying safeguarding concerns, including attempts to access harmful, illegal or age-inappropriate content.
- Ensure there are transparent mechanisms in place for the identification, intervention and escalation of any incidents or concerns, where appropriate
- Support the access to age-appropriate online safety education through liaison with the education provision which has over-arching responsibility for the young person supported by Take 2 Cornwall, including the safe use of social media, online relationships, privacy, consent, digital footprints, misinformation, cyberbullying, online exploitation and emerging technologies such as AI.
- Ensure staff receive regular online safety training, including emerging risks, technology-assisted harmful sexual behaviour, online exploitation, cyberbullying and online radicalisation.
- Work in partnership with parents and carers to promote online safety through regular communication, guidance and awareness raising.
- Ensure staff understand the restrictions relating to personal mobile phones and cameras, including that personal devices must not be used to photograph, record or store images of pupils.
- Require pupils, staff, volunteers and, where appropriate, parents and carers to comply with Acceptable Use Agreements.
- Ensure sanctions are applied consistently where online safety or acceptable use expectations are breached.
- Ensure staff understand the circumstances in which a search of a pupil's device may be lawful and proportionate in accordance with current legislation and DfE guidance.

The four key risk categories

Take 2 Cornwall will use the following categories of risk to address online safety as stated in KCSIE:

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

To address these risks, Take 2 Cornwall will:

- Ensure pupils are educated about online safety in consultation with the education provision which has over-arching responsibility for the young person supported by Take 2 Cornwall, including:
 - o How to safely use social media, the internet and technology
 - o How to keep personal information private
 - o How to recognise unacceptable online behaviour
 - o How to report cyber-bullying incidents, encouraging pupils to do so, even if they are a witness rather than a victim
 - o How generative AI tools, chatbots and image-generation platforms can create safeguarding risks, misinformation, manipulated content and AI-generated sexual imagery.
- Ensure staff are trained during induction on online safeguarding issues, including cyber-bullying, safe internet use and the risks associated with online

radicalisation. Refresher training will be received by all staff at least once every academic year

- Ensure parents/carers are educated about online safety through regular communications from the education provision which has over-arching responsibility for the young person supported by Take 2 Cornwall, through their parent consultation events and via the Take 2 and the school website, including the procedures they need to know to raise any concerns about online safety
- Ensure all staff understand restrictions or protocols with regards to the use of their mobile phone and cameras, e.g.:
 - o Use of personal mobile phones is restricted to non-contact time when pupils are not present
 - o No pictures or recordings of pupils can be made on personal phones or cameras
- Ensure all children, parents/carers, staff, and volunteers sign an Acceptable Use Agreement regarding the acceptable use of the internet in Take 2 Cornwall hubs, use of Take 2 Cornwall's ICT systems and use of their mobile and smart technology
- Ensure there are clearly explained sanctions in place that will be enforced if a pupil is in breach of our policies on the acceptable use of the Internet and mobile phones
- Ensure staff understand the circumstances in which a search of a pupil's device may be lawful and proportionate, in accordance with DfE guidance on searching, screening and confiscation. (See [DfE's guidance on searching, screening and confiscation](#))
- Ensure robust filtering and monitoring systems are in place, are effective, regularly reviewed and capable of identifying safeguarding concerns, including attempts to access harmful, illegal or age-inappropriate content.

Notifying parents or carers

Any safeguarding concerns about a child will normally be discussed with their parent/carers. In the event of a disclosure or safeguarding issue, parental contact will be made by the DSL or designated member of staff following a consultation with the DSL.



If Take 2 Cornwall believes that notifying parents/carers would increase the risk to the child, advice will be sought from the local authority children's social care team before any notification is made.

In cases where allegations of abuse are made against other children, Take 2 Cornwall will normally notify the parents/carers of all children involved, unless this is assessed as presenting a risk to one or more of those children. The wishes of the victim will be considered wherever appropriate, although Take 2 Cornwall's safeguarding responsibilities may require information to be shared in order to protect children from harm. Take 2 Cornwall will work with the police and/or local authority children's social care to ensure a consistent approach to information sharing.

Decisions will be made on a case-by-case basis. The DSL will, in collaboration with relevant agencies:

- Meet with the victim and their parents/carers and discuss the measures put in place to ensure they are safeguarded, to ascertain what support they may want and need as well as how the report will be progressed
- Meet with the alleged perpetrator's parents/carers to discuss support for the perpetrator as well as any consequences that will have an impact, e.g. separation from the victim by moving classes, and the rationale for any decisions made.

Pupils with SEND, Disabilities, Medical Conditions and Additional Vulnerabilities

Take 2 Cornwall recognises that young people with SEND, disabilities, medical conditions, allergies, mental health needs and other vulnerabilities may face additional safeguarding challenges and barriers to recognising, reporting or disclosing abuse. Research indicates that children with SEND are at greater risk of abuse than their peers and may require additional support to access safeguarding systems and services.

These additional barriers include:

- Indicators of abuse (such as changes in behaviour, mood, or injury) being assumed to relate to the child's condition, without further exploration.

- A higher prevalence of peer group isolation, social exclusion or bullying (including prejudice-based bullying).
- A higher likelihood of being bullied, exploited or abused without displaying outward signs.
- Difficulties in recognising, managing, or reporting abuse due to communication barriers, cognitive differences or additional needs
- Increased vulnerability online, including to grooming, exploitation and manipulation.

Take 2 Cornwall also recognises that some children with SEND, disabilities, medical conditions or long-term health needs may experience mental health difficulties. Mental health concerns may increase vulnerability to abuse, exploitation, bullying or neglect and may also be an indicator that a child has experienced harm. Where mental health concerns are identified alongside safeguarding concerns, these will be managed through the school's safeguarding procedures, with appropriate collaboration between the DSL, SENCO, Designated Mental Health Lead (or Senior Mental Health Lead), relevant health professionals and parents/carers.

Additionally, Take 2 Cornwall recognises that gender-questioning young people may experience increased vulnerability to bullying, prejudice, isolation, mental health difficulties and abuse. Staff should be alert to safeguarding concerns and ensure that any decisions affecting individual children are made on a case-by-case basis, involving relevant professionals and parents/carers where appropriate, while keeping the child's welfare at the centre of decision-making.

- Where a child with SEND experiences or is suspected to have experienced abuse, this will be managed jointly by the DSL and a member of the management team, in line with current statutory guidance, the SEND Code of Practice, and the Equality Act 2010, in consultation with the education provision which has over-arching responsibility for the young person supported by Take 2 Cornwall.

Take 2 Cornwall recognises that children with medical conditions, including severe allergies and anaphylaxis risk, may face safeguarding risks where systems, communication or emergency response arrangements are ineffective.

Take 2 Cornwall will ensure:

- Individual Healthcare Plans (IHPs) are in place where required
- staff receive training to understand medical needs relevant to their role

- clear communication systems exist for managing medication and emergency response
- incidents and near misses are recorded, reviewed and used to improve practice
- allergy risk reduction procedures are implemented across food provision, curriculum activities and school events

These arrangements are set out in Take 2 Cornwall's Supporting Pupils with Medical Conditions Policy and Allergy Safety Policy.

Pupils with a social worker

Take 2 Cornwall recognises that having a social worker is a safeguarding indicator and that these children may require additional support to achieve positive educational outcomes.

Take 2 Cornwall also recognises that adverse or traumatic childhood experiences – such as abuse, neglect, domestic abuse, parental mental ill health, or substance misuse – may make a child more vulnerable to harm and create barriers to learning, behaviour, wellbeing and attendance.

In line with current statutory guidance, Take 2 Cornwall, in consultation with the education provision which has over-arching responsibility for the young person supported by Take 2 Cornwall will work in partnership with social workers to help protect and support these children, ensuring that safeguarding, alternative provision and educational provision are joined up.

For any child who has a social worker (including those who are subject to a Child Protection Plan, Child in Need Plan, or who are looked-after), the DSL will take this into account when making decisions, to ensure these are in the best interests of the child's safety, welfare, and educational outcomes. This will inform decisions about:

- Responding to unauthorised absence or missing education, particularly where safeguarding risks are known.
- Behaviour and safeguarding responses.
- Providing tailored pastoral, safeguarding, and academic support.
- Liaising with the social worker and other relevant professionals to share information promptly where it is in the child's best interests.

- Identifying and responding to mental health and emotional wellbeing concerns.
- Supporting attendance, engagement and educational progress.

Young Carers

The school recognises that young carers may experience additional safeguarding vulnerabilities due to caring responsibilities, emotional pressures, attendance difficulties, fatigue or reduced opportunities to access support. Staff should be alert to indicators that a child may be undertaking inappropriate caring responsibilities and ensure appropriate support is provided.

Looked-after and previously looked-after children

In line with the Children Act 1989, Children and Social Work Act 2017 and current statutory guidance, Take 2 Cornwall ensures that all looked-after children (LAC) and previously looked-after children (PLAC) are kept safe and supported to achieve their full potential.

We define:

- Looked-after children (LAC) as those who are in the care of the local authority under a care order or accommodated voluntarily.
- Previously looked-after children (PLAC) as those who are no longer looked-after because they have been adopted, are subject to a child arrangements order, or a special guardianship order.

Take 2 Cornwall ensures:

- All relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements are shared with relevant and appropriate staff
- The DSL knows the details of children's social workers and relevant virtual school heads
- Appropriate safeguarding, pastoral and educational support is provided to meet individual needs.



Attendance and safeguarding

Take 2 Cornwall recognises that poor attendance, persistent absence, severe absence, missing education and unexplained absence may be indicators of safeguarding concerns. These may include abuse, neglect, exploitation, mental health difficulties, serious violence, criminal exploitation or family difficulties.

Attendance concerns will therefore be considered as part of Take 2 Cornwall's safeguarding arrangements and, where appropriate, referred to the DSL for further consideration. Take 2 Cornwall record daily attendance in consultation with the education provision which has over-arching responsibility for the young person in their care.

Complaints and concerns about safeguarding

Complaints against staff

Any complaints against staff (including volunteers or contractors) where a child protection investigation may be required will be handled in accordance with Take 2 Cornwall's Procedures for Dealing with Allegations of Abuse Against Staff and current statutory guidance. (see [Appendix 3](#)).

Whistle-blowing - see separate Whistle Blowing Policy

Record-keeping

Take 2 Cornwall maintains all safeguarding records in accordance with:

- KCSIE
- Data Protection Act 2018 and UK GDPR
- Take 2 Cornwall's Records Retention Schedule
- Local safeguarding arrangements and safeguarding partner requirements

Take 2 Cornwall keeps all records in line with our records retention schedule.

As required, all safeguarding concerns are recorded in writing, including discussions and any decisions made with the reasons for those decisions.

All records include the following:

- A summary of the concern which is clear and comprehensive
- How a concern was followed up and resolved
- Details of decisions reached, action(s) taken and outcome(s)

Safeguarding records should be factual, accurate, relevant, signed, dated and recorded as soon as possible after an event or disclosure. Records should distinguish between fact, observation, opinion and professional judgement, and should include the rationale for decisions made and actions taken.

Each child who is the subject of safeguarding concerns will have an individual safeguarding file maintained separately from the main pupil record.

Records which are non-confidential records will be readily accessible and available. Any confidential information and records are securely held and only made available to those with a professional need or right to do so.

Safeguarding records of individual children are kept after they have left Take 2 Cornwall for a reasonable time.

Take 2 Cornwall will retain safeguarding records relating to child protection concerns, allegations and investigations in accordance with statutory guidance, legal requirements and Take 2 Cornwall's Records Retention Schedule.

When a child moves to another provision, it is the responsibility of the DSL to ensure that their child protection file is securely forwarded as soon as possible, separate from the main pupil file, in consultation with the education provision which has over-arching responsibility for the young person supported by Take 2 Cornwall,.

To enable the receiving provision to have the appropriate support in place, this transfer of records should be:

- **Within 5 days** for an in-year transfer, or
- **Within the first 5 days** at the beginning of a new term

Where there are significant or complex concerns and/or involvement of social care, then the DSL will contact the receiving provision's DSL, ensuring all relevant information is passed on to enable necessary preparations and a continuum of care.

In addition:

- See [Appendix 2](#) for record-keeping for recruitment and pre-appointment checks



- See [Appendix 3](#) for record-keeping for allegations of abuse made against staff

Training

For all staff

All staff will receive safeguarding and child protection training (including whistle-blowing procedures, online safety, and the use of mobile/smart technology) as part of their induction.

This will be:

- Refreshed and updated **at least annually**
- Updated more frequently where there are changes in statutory guidance, local safeguarding arrangements, or emerging risks

Integrated into the whole-service training programme so that safeguarding is embedded into all aspects of professional development and curriculum delivery

- Aligned with advice from local safeguarding partners

Training will cover:

- Statutory duties and responsibilities in identifying and reporting signs of abuse, neglect, exploitation, and other safeguarding concerns
- Take 2 Cornwall's safeguarding system, including procedures for reporting concerns, whistle-blowing, and managing allegations
- Online safety, the four risk categories (Content, Contact, Conduct, Commerce), and responsibilities under the Online Safety Act 2023.
- Managing behaviour effectively to ensure a good and safe environment
- Understanding the needs of all children, including those with SEND, health needs, or other vulnerabilities
- Awareness of the *Prevent Duty*, including recognising risk indicators for radicalisation and extremism and how to make referrals
- Family Help framework and multi-agency working
- Recognition of discrimination, bias and barriers to disclosure in safeguarding practice

- understanding safeguarding vulnerabilities linked to medical conditions, disabilities and allergies
- understanding the relationship between mental health, emotional wellbeing and safeguarding, including recognising when mental health concerns may indicate a safeguarding risk.
- recognition of technology-assisted harmful sexual behaviour, including AI-generated sexual images and digitally manipulated imagery
- trauma-informed practice, including understanding the impact of adverse childhood experiences (ACEs) on behaviour, wellbeing and learning
- understanding emerging safeguarding risks and the importance of identifying concerning behaviours, patterns and indicators of potential harm at the earliest opportunity, as well as contextual safeguarding.

All volunteers will receive safeguarding training appropriate to their responsibilities before beginning work with pupils.

For the DSL and DDSL(s)

The Designated Safeguarding Lead (DSL) and Deputy DSL(s) will undertake child protection and safeguarding training in accordance with statutory requirements. This will:

- Be updated formally at least every two years
- Be supplemented by regular updates at appropriate intervals to maintain knowledge of current safeguarding issues, guidance, legislation and local procedures.
- Include *Prevent* awareness training
- Develop advanced skills in inter-agency working, Early Help and Family Help processes, record-keeping, and managing complex safeguarding cases
- Develop expertise in online safety, filtering and monitoring, technology-assisted harmful sexual behaviour, AI-generated sexual imagery and emerging online risks.
- Develop skills in safeguarding leadership, quality assurance, supervision, multi-agency working and supporting staff with safeguarding concerns.
- Maintain an understanding of safeguarding issues affecting vulnerable groups, including children with SEND, children with a social worker, looked-after and



previously looked-after children, young carers and children experiencing mental health difficulties.

Safer Recruitment

Interview Panels

Take 2 Cornwall is committed to robust safer recruitment procedures in line with Keeping Children Safe in Education (KCSIE), our local safeguarding partnership requirements

We ensure that:

- At least one person involved in the recruitment process, including the interview stage, will have completed appropriate Safer Recruitment training.
- Trained individuals will participate in the shortlisting and interview process to ensure that safeguarding is embedded in recruitment decisions.
- All recruitment decisions are made with safeguarding in mind, considering any history of concerns, suitability to work with children, and alignment with our safeguarding culture.
- Recruitment checks and procedures follow those set out in Appendix 2 - Safer Recruitment Procedures.
- All pre-appointment checks are recorded on the Single Central Record (SCR) in line with statutory requirements.
- Recruitment processes will promote the school's safeguarding culture, including expectations relating to professional conduct, low-level concerns and safeguarding responsibilities.

See [Appendix 2](#) for safer recruitment procedures.

We will ensure:

1. Disqualification Checks

- Before appointment, relevant staff will be asked to declare whether they are disqualified from childcare under the Childcare (Disqualification) Regulations 2018 and whether any circumstances exist that may affect their suitability to work with children.



- Relevant childcare disqualification checks will be completed and recorded in accordance with statutory requirements.
- No person who is disqualified will be engaged in relevant childcare unless they have obtained a waiver from Ofsted.

2. References and Verification

- Two written references will be obtained before the start date, with at least one from the current or most recent employer.
- Original qualifications and professional status will be verified, particularly for Level 2/3 Early Years qualifications.
- Identity will be confirmed using original photographic ID in person.

3. Ongoing Suitability

- Take 2 Cornwall may require periodic declarations from staff to confirm their ongoing suitability to work with children and compliance with relevant statutory requirements.

Arrangements for monitoring

This policy must be reviewed annually by Paula Atkinson, Director, Take 2 Cornwall, in consultation with the Designated Safeguarding Lead (DSL) and must be approved by the full management team, as appropriate.

The annual review will take account of safeguarding audits, monitoring activity, staff and pupil feedback, training records, local safeguarding priorities, emerging risks and any lessons learned from safeguarding incidents.

In addition, the policy will be updated:

- **Immediately** if there are significant changes in safeguarding legislation, statutory guidance (including *Keeping Children Safe in Education*), local safeguarding procedures, or best practice.
- Following any serious safeguarding incident, inspection feedback, or lessons learned from internal reviews.
- Where changes are required to reflect the specific needs or risks of the Take 2 Cornwall community.

A record of the review date, the reviewing officer, and the approving body will be maintained.

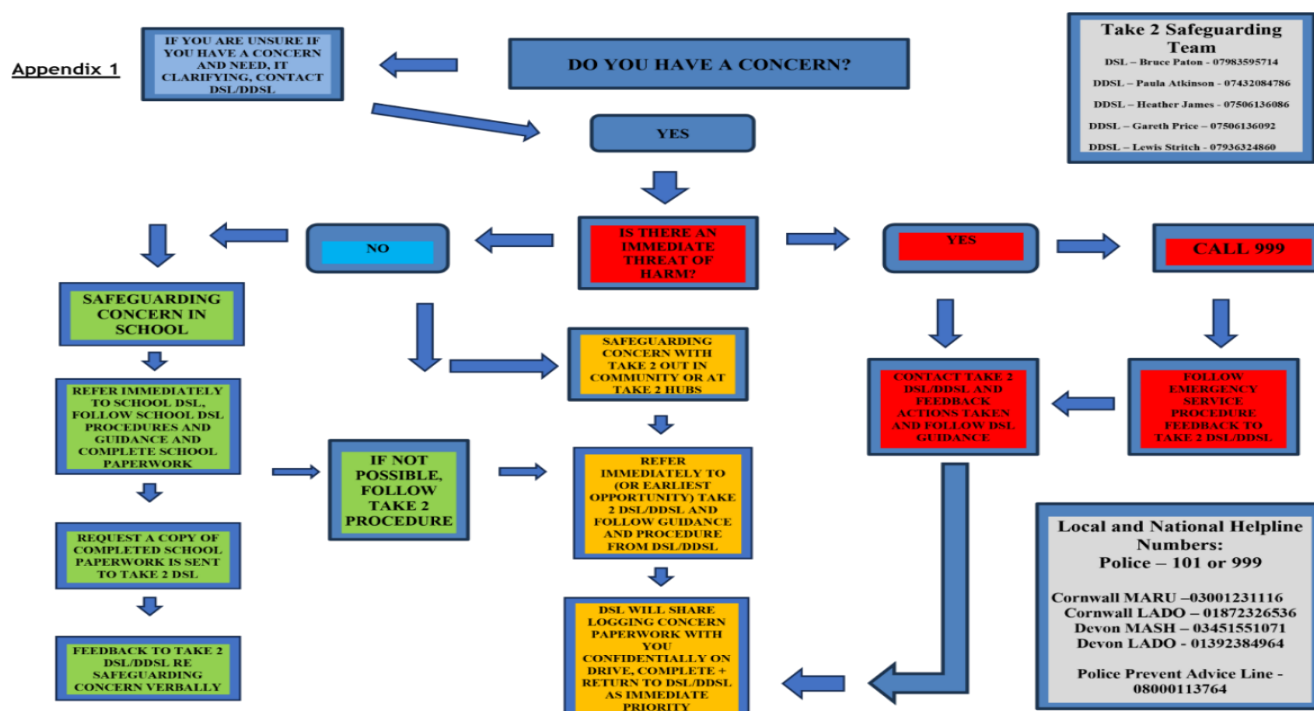
Other policy links

This policy should be read in conjunction with, and operates alongside, the following school policies and procedures:

- Staff Behaviour / Code of Conduct
- Behaviour Policy
- Complaints Policy
- Health and Safety Policy
- Online Safety Policy
- Mobile Phone and Smart Technology Use Policy
- Equality Policy
- First Aid Policy
- Privacy Notices
- Whistleblowing Policy
- Safer Recruitment Policy
- Educational Visits Policy
- Special Educational Needs and Disabilities (SEND) Policy
- Intimate Care Policy (where applicable)
- Supporting Pupils with Medical Conditions Policy
- Allergy Safety Policy
- Administration of Medicines Policy
- Individual Provision Plans
- Health Care Needs Risk Assessment received via include consultation with the education provision which has over-arching responsibility for the young person supported by Take 2 Cornwall

All the following Appendices are based on the DfE's statutory guidance, Keeping Children Safe in Education

FIGURE 1: ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of the full version of KCSIE.

² Early Help and Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Early Help and Family Help and an inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the Early Help and Family Help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

Appendix 1: Types of abuse

Update each year on the release of updated KCSIE.

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of witnessing the ill-treatment of others. For example, this can be particularly relevant to the impact on children of all forms of domestic abuse. Children may be abused by an adult or adults or another child or children. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or by another child or children.

Physical abuse

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

Emotional abuse

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

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as



masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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 it and of their school or college's policy and procedures for dealing with it.

Neglect

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, due to maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.



Appendix 2: Safer Recruitment and DBS Checks - Policy and Procedures

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

To ensure suitable people to work with children are recruited, those staff involved in recruiting and selecting staff receive safer recruitment training.

Take 2 Cornwall has the following procedures to ensure our commitment to safeguarding and promoting children's welfare.

Advertising

Take 2 Cornwall makes the following clear in all adverts:

- Take 2 Cornwall's commitment to safeguarding and promoting the welfare of children
- That all safeguarding checks will be undertaken
- The requirements and responsibilities of the role of safeguarding, i.e., the extent to which the role will involve contact with children
- If the role is exempt or not from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. Where the role is exempt, Take 2 Cornwall is mindful that certain spent convictions and cautions are 'protected' and do not need to be disclosed, or if disclosed, they will not be considered
- That a full application must be submitted, and a curriculum vitae (CV) will not be sufficient to support safer recruitment practice
- That, should a candidate be shortlisted, online searches as part of our due diligence checks may be carried out

Application forms

To comply with the requirements of KCSIE, Take 2 Cornwall insists that full application forms must be completed for any posts in schools.

Take 2 Cornwall applications forms include the following:

- A statement which makes it clear that it is an offence to apply for the role if an applicant is barred from engaging in a regulated activity relevant to children (where the role involves this type of regulated activity)
- A copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- Personal details, current and former names, current address and national insurance number
- Details of their present (or last) employment and reason for leaving
- Full employment history (since leaving school, including education, employment and voluntary work), including reasons for any gaps in employment
- Qualifications, the awarding body and the date of award
- Details of referees/references, and
- A statement of the personal qualities and experience the applicant believes are relevant to their suitability for the advertised post and how they meet the person specification

Shortlisting

The shortlisting process will involve at least 2 people, who will also be on the interview panel for consistency, and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

All shortlisted candidates will then:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children so that they have the opportunity to share relevant information and discuss it at the interview stage.

The information we will ask for includes the following:

- o If they have a criminal history
- o Whether they are included on the barred list
- o Whether they are prohibited from teaching

- o Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - o Any relevant overseas information
- Sign a declaration confirming that the information provided is true

In addition, in line with KCSIE, Take 2 Cornwall will carry out an online search for all shortlisted candidates. This will form part of our pre-appointment due diligence to help identify any incidents or issues that are publicly available online and may need to be explored at interview. These searches will:

- Be limited to identifying information that could reasonably be relevant to the applicant's suitability to work with children.
- Be conducted in a proportionate and consistent way.
- Respect candidates' privacy rights and comply with data protection law.
- Be documented, with any concerns raised explored with the candidate at interview.

(For guidelines for online searches, see Appendix 5)

Seeking references and checking employment history

Take 2 Cornwall will request references before the interview, enabling any concerns raised to be explored further with referees and taken up with the candidate at the interview.

When seeking references, Take 2 Cornwall will:

- Not accept open references, e.g. to whom it may concern
- Not rely on applicants to obtain their reference
- Ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or
- Obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed
- Secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children); if the applicant has never worked with children, then ensure a reference from their current employer



- Always verify any information with the person who provided the reference
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify content where information is vague or insufficient information is provided
- Compare the information on the application form with that in the reference and take up any discrepancies with the candidate
- Establish the reason for the candidate leaving their current or most recent post, and,
- Ensure any concerns are resolved satisfactorily before the appointment is confirmed

Interview and selection

When interviewing candidates, the school will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

Take 2 Cornwall records all information on the checks carried out in the Take 2 Cornwall's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. Take 2 Cornwall follow all mandatory pre-employment requirements and best practices in retaining copies of these checks (see below).

New staff

All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks. When appointing new staff, the school will:

- Verify their identity to be sure that the person is whom they claim to be, including being aware of the potential for individuals changing their name. In line with best practice, Take 2 Cornwall will verify identity using appropriate original documents in accordance with current statutory guidance.

- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). Take 2 Cornwall will obtain the certificate before, or as soon as practicable after, the appointment, including when using the DBS update service. Where an applicant is subscribed to the DBS Update Service, Take 2 Cornwall will check their existing certificate online. A copy of the certificate will not be kept for longer than 6 months, but Take 2 Cornwall will still keep a record of the fact that vetting took place, the result of the check and the recruitment decision taken
- Obtain a separate barred list check where a candidate will start work in regulated activity before the DBS certificate is available. Note: such situations will be considered on an individual basis and wherever possible avoided. In such situations the newly appointed candidate will remain fully supervised until DBS clearance is received.
- Verify that the individual has the health and physical capacity to carry out the role, in accordance with equality legislation and statutory guidance
- Verify the person's right to work in the UK, including EU nationals. Take 2 Cornwall will keep a copy of this verification for the length of their employment plus two years. If there is uncertainty Take 2 Cornwall whether an individual needs permission to work in the UK, then the school will follow advice on the gov.uk website
- Verify professional qualifications, as appropriate. Take 2 Cornwall will use the Teaching Regulation Agency's (TRA) Employer Access Service to verify any qualified teacher status (QTS) award and the completion of teacher induction or probation
- if the candidate is to be employed as a teacher, ensure they are not subject to a prohibition order
- Where candidates have lived or worked outside of the UK, Take 2 Cornwall will carry out further additional checks, including, where available:
 - o [Criminal records checks for overseas applicants](#) for all staff, including teaching positions:
- Take 2 Cornwall will check that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006 by ensuring all appropriate checks are carried out. For clarity, disqualification by association does not apply in schools (including nurseries and maintained schools) except

where childcare is provided in a domestic setting. Suppose a candidate falls outside of the scope of these regulations and the school does not carry out such checks. In that case, a record of our assessment will be kept on the individual's personnel file, including an evaluation of any risks and control measures put in place as well as any advice gained

Regulated activity- a person will be engaging in regulated activity with children if, as a result of their work, they:

- Will be responsible, on a regular basis for instructing, caring for or supervising children
- Will be working on a regular basis in a specified establishment in connection with the purposes of the establishment, where the work gives an opportunity for contact with children, or
- Engage in intimate or personal care, healthcare, even if this happens only once.

Existing staff

There are certain circumstances where Take 2 Cornwall will carry out relevant checks. Such circumstances are:

- When there are concerns about the suitability to work with children of an existing staff member; or
- An existing staff member moves from a post that is not regulated to a post in regulated activity: or

In the case where an existing staff member harms or poses a risk of harm to a child or vulnerable adult, the school will refer to the DBS in the following circumstances:

- Where the school believes the staff member has engaged in [relevant conduct](#); or
- Where the school believes the staff member has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- Where Take 2 Cornwall believes the 'harm test' is satisfied in respect of the staff member (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and



- Where the staff member has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

Take 2 Cornwall will ensure that written notification from any agency or third-party organisation confirms that the necessary safer recruitment checks on their staff working in our provision have been performed. Take 2 Cornwall will then verify that the identity of the person working is the same person on whom the checks have been made.

Contractors

The school ensure that any contractor, or any employee of the contractor, working at Take 2 Cornwall, has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- For regulated activity- An enhanced DBS check with barred list information
- Not in regulated activity but with an opportunity for regular contact with children - An enhanced DBS check, not including barred list information

Take 2 Cornwall will ensure that appropriate DBS checks have been completed for self-employed contractors where required.

Copies of such checks will not be kept for longer than six months.

No contractors will be allowed to work unsupervised or engage in regulated activity under any circumstances unless checks have been satisfactorily carried out.

Take 2 Cornwall will check the identity of all contractors and their staff upon arrival.

Volunteers

Take 2 Cornwall will ensure that volunteers:

- Never work in regulated activity or are left unsupervised with children
- Have a risk assessment, which will be retained, whilst Take 2 Cornwall decides whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity

Adults who supervise pupils on work experience

Take 2 Cornwall will ensure that policies and procedures are in place to protect children from harm when organising work experience. There will also be consideration given as to whether there is a necessity for barred list checks to be



carried out on the individuals who supervise a child under 16 on work experience. The specific circumstances of the work experience will determine this, such as the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Data protection and retention

All personal data, including criminal record information and DBS certificate results, will be processed in accordance with the Data Protection Act 2018, UK GDPR, and our school's data protection policy. Information will be stored securely, accessed only by authorised personnel, and retained only for as long as necessary to fulfil safeguarding and legal requirements.

Appendix 3: Allegations of abuse made against staff

Section 1: Allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

This section of the guidance applies where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children - including where this behaviour in their personal life or online presents a transferable risk to working with children (for example, domestic abuse, inappropriate online activity, or offences against adults), and including behaviour taking place both inside and outside of school

Take 2 Cornwall will consult our local authority designated officer (LADO) if there is any doubt as to whether a concern meets the harm threshold.

Any allegations of abuse will be dealt with quickly and fairly whilst providing consistent child protection in addition to also supporting the individual who is the subject of the allegation.

A member of the management team will be the 'case manager' and lead any investigation.

Take 2 Cornwall's procedures for dealing with allegations will be consistently applied with common sense and judgement.

Suspension of the accused until the case is resolved

It is not the default position to suspend the accused and will only be considered in cases where:

- There is reason to suspect that a child or other children is/are at risk of harm, or
- The case is so serious that there might be grounds for dismissal

In such cases, an individual will only be suspended if there is no reasonable alternative, having considered all other options available.

Take 2 Cornwall will consider the following alternatives after an assessment of risk(s):

- Redeployment - within the provision, removing direct contact with the child or children concerned or alternative work so as not to have unsupervised access to children
- The provision of another adult to be present when the individual has contact with children

The case manager can seek advice from the school's HR adviser and the designated officer at the local authority, as well as the police and children's social care involved.

Outcome definitions for allegation investigations

- **Substantiated:** sufficient evidence has been provided to prove the allegation
- **Malicious:** sufficient evidence has been provided to disprove the allegation as it was found to be a deliberate act to deceive or to cause harm to the subject of the allegation
- **False:** sufficient evidence has been provided to disprove the allegation
- **Unsubstantiated:** insufficient evidence has been provided to neither prove nor disprove the allegation (no implication of guilt or innocence)
- **Unfounded:** used to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

The case manager will take the following steps when an allegation meets the above criteria:

- Ensure that before carrying on with the steps below, the facts are established to help determine whether there is any foundation to the allegation by conducting basic enquiries in line with local procedures and without

interviewing children or staff beyond initial clarification, so as not to compromise any potential investigation

- Ensure the allegation is discussed with the designated officer at the local authority to consider the nature, content and context of the allegation and agree on a course of action. This should include discussing whether further enquiries are necessary to decide how to proceed and whether it is necessary to involve the police and/or children's social care services. (There are occasions when the case manager may consider involving the police before consulting the designated officer, e.g. if the accused individual is deemed an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the designated officer will be notified by the case manager as soon as possible after contacting the police)
- Ensure the accused individual is informed by the case manager of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, only information that has been agreed with those agencies will be shared with the individual and the individual will be reminded of the requirement to maintain confidentiality about the allegation while it is ongoing
- Ensure, where appropriate (in the circumstances described above), to carefully consider whether suspension of the individual from contact with children at Take 2 Cornwall is justified or whether alternative arrangements such as those outlined above can be put in place. Seek advice from the designated officer, police and/or children's social care services as appropriate
- Ensure any concerns about the welfare of other children in the community or the individual's family are discussed with the DSL, making a risk assessment of the situation. Where necessary, the DSL may make a referral to children's social care
- Ensure the rationale for this is agreed upon and recorded with the designated officer if immediate suspension is considered necessary. The record must include information about considering alternatives to suspension and the reasons for rejection. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within one working day, including the named contact and their contact details at the school with whom the individual can liaise.

- Ensure **that if it is decided that no further action is to be taken** regarding the allegation or concerns, the decision is recorded, including the justification for this. Agree with the designated officer on what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- Ensure, **if it is decided that further action is needed**, steps are taken as agreed with the designated officer to begin the appropriate action and/or liaise with the police and/or children's social care services as appropriate
- Ensure effective support for the individual facing the allegation or concern is provided, including appointing a named representative to inform them of the case's progress and considering what other support is appropriate.
- Ensure the parents/carers of the child/children involved are informed about the allegation as soon as possible, following an agreement with children's social care services and/or the police, where applicable. The case manager will also inform the parents/carers of their requirement to maintain confidentiality about any allegations made against staff (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a member of staff will be advised to seek legal advice
- Ensure the parents or carers of the child/children involved are kept informed of the progress of the case (only about their child - no information will be shared regarding the staff member)
- Ensure a referral is made to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child or if the individual otherwise poses a risk of harm to a child

Take 2 Cornwall will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations.

In cases where the police are involved, Take 2 Cornwall may, at the start of the investigation, ask the police to obtain consent from the individuals involved to share their statements and evidence for use in Take 2 Cornwall's disciplinary process, should this be required later.



Additional considerations for support staff supplied by the commissioning provision and all contracted staff

Where concerns or allegations are lodged against someone who is not directly employed by Take 2 Cornwall,

- Find out the facts and liaise with the LADO to determine a suitable outcome before deciding to stop using an individual due to safeguarding concerns.
- Take 2 Cornwall will address issues such as information sharing, to ensure any previous concerns or allegations known to the provider are taken into account

Timescales

All allegations will be dealt with as quickly and effectively as possible, and where reasonably practicable. The following timescales are indicative and represent good practice targets where circumstances allow. Take 2 Cornwall will aim to comply with the following timescales:

- Where an allegation is unsubstantiated or malicious, the resolution should be within one week
- Where an allegation does not require formal disciplinary action, appropriate action should be taken within three working days
- Where there is a requirement for a disciplinary hearing that can be held without further investigation, this should be held within 15 working days

The above timescales are aims; if they are not met, Take 2 Cornwall will take the necessary action as soon as possible.

Specific actions

Action following a criminal investigation or prosecution

There will be a discussion between the case manager and the local authority's designated officer to ascertain whether there needs to be any further action, including disciplinary action and how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

Take 2 Cornwall will make a referral to the DBS for consideration of whether inclusion on the barred lists is required in cases where the allegation is substantiated, the individual is dismissed, Take 2 Cornwall ceases to use their services, or the individual resigns or otherwise ceases to provide their services.



Individuals are returning to work after suspension

Based on the case's conclusion, the case manager will consider how best to facilitate a return to work for any individual where it is decided that the suspension is lifted.

Consideration will also be given by the case manager on how best to manage the individual's contact with the child or children who made the allegation if they are still attending Take 2 Cornwall.

Unsubstantiated, unfounded, false or malicious allegations

In the case where a report is:

- Found to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. A referral to children's social care may be appropriate if it is considered that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help
- Found to be deliberately invented or malicious, there will be consideration by Take 2 Cornwall as to whether any disciplinary action is appropriate against the individual(s) who made it

In the case where an allegation is:

- Found to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. A referral to children's social care may be appropriate if it is considered that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help
- Found to be deliberately invented or malicious, there will be consideration by Take 2 Cornwall as to whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

While an allegation is being investigated or considered, Take 2 Cornwall will make every effort to maintain confidentiality and guard against unwanted publicity.

The case manager, with advice from the LADO, police and children's social care services, as appropriate, will agree:

- Who needs to know and what information can be shared about the allegation

- How to manage the fallout, including speculation, leaks and gossip and how to ensure parents or carers of a child/children involved are made aware of their obligations concerning confidentiality
- What information, if any, can be shared with the wider community to reduce speculation
- How to manage the interest of the press if it arises

Record-keeping

All records about any case where the allegation or concern meets the criteria above will be managed by the case manager and stored on the individual's confidential personnel file for the duration of the case.

Following an investigation, records of any allegation found to be malicious or false will be deleted from the individual's personnel file (unless the individual wishes for it to remain).

In the case of all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A summary of the allegation, which is clear and comprehensive
- How the allegation was followed up and resolved
- Any action notes were taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

Take 2 Cornwall will provide a copy to the individual in agreement with the children's social care or the police as appropriate.

Records relating to safeguarding allegations and concerns will be retained in accordance with statutory guidance, legal requirements and Take 2 Cornwall's Records Retention Schedule. Take 2 Cornwall retains all other records at least until the individual has reached normal pension age, or for ten years from the date of the allegation if that is longer.

References

When Take 2 Cornwall provides an employer reference:

- There will not be any reference to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations



which have all been found to be false, unfounded, unsubstantiated or malicious

- Substantiated allegations will be included as long as the information is factual and does not include opinions

Learning lessons

Following any cases where the allegations are substantiated, the circumstances of the case will be reviewed by the case manager with the local authority's designated officer and determine whether improvements could be made to the Take 2 Cornwall's procedures or practice to prevent similar events from happening in the future.

Consideration will be given to the following:

- Any issues which may have arisen from the decision to suspend the member of staff
- The length of time of the suspension
- The justification for suspension
- The use of suspension in the case where an individual is subsequently reinstated and how, in future investigations of a similar nature, could the investigation be carried out without the need to suspend the individual

Non-recent allegations

Abuse can be reported at any stage in the future.

All non-recent allegations made by a child will be reported to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

If an adult makes a non-recent allegation relating to abuse experienced as a child, the school will advise and support the individual to report the matter to the police and, where appropriate, will seek advice from the LADO.

Section 2: Concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns and allegations that do not meet the harm threshold set out in Section 1 above about staff members, volunteers and contractors.



Concerns that may arise through:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of the staff
- Disclosure made by a child, parent or another adult within or outside the school
- Pre-employment vetting checks

All concerns will be responded to and dealt with promptly to safeguard children's welfare.

Definition of low-level concerns

The term 'low-level' concern is any concern that an adult working in or on behalf of the school may have acted in a way that:

- Is not consistent with the staff code of conduct, including conduct that is inappropriate outside of work, **and**
- Is not considered serious enough to consider a referral to the designated officer at the local authority or does not meet the allegations threshold

Such behaviour could include, but is not limited to:

- Photographing children on a personal mobile phone
- Inappropriate, overly friendly interactions with children
- Engagement with a single child in a secluded area or behind a closed door
- Humiliating pupils
- Use of AI tools or digital platforms in a way that breaches professional boundaries.
- Failure to follow Take 2 Cornwall's expectations relating to online safety or device use.

Sharing low-level concerns

Take 2 Cornwall encourages all staff to confidentially share low-level concerns so that they can be addressed appropriately and, therefore, aims to create a culture of openness, trust and transparency to enable this.



Take 2 Cornwall creates this culture by:

- Ensuring staff have clarity about what appropriate behaviour is and have the confidence to distinguish between expected and appropriate behaviour from behaviours that are concerning, problematic or inappropriate behaviour in themselves and others
- Ensuring staff are empowered to share any low-level concerns as per [Concerns about a staff member, supply teacher, volunteer or contractor](#) section of this policy
- Ensuring staff understand it is an expectation that they self-refer where they have behaved in a way that could meet the harm threshold or may be considered a low-level concern
- Ensuring any unprofessional behaviour is addressed, and support is given at an early stage to any individual who needs to correct it
- Ensuring the provision of a responsive, sensitive and proportionate handling of such concerns when they are raised
- Ensuring staff are empowered to identify and report any weaknesses in the school's safeguarding system

Responding to low-level concerns

Where a third party raises concerns, the Office Manager will collect evidence where necessary by speaking:

- To the referring person directly, unless it has been raised anonymously
- To the individual involved and any witnesses

In the case of all low-level concerns, the General Manager will make the ultimate decision, though this may be in consultation with the DSL.

Low-level concerns may also include behaviour relating to professional boundaries in digital environments, including communication with pupils through social media, messaging platforms, gaming platforms or other online communication tools outside agreed school procedures. Such behaviour will be reviewed to ensure appropriate professional boundaries are maintained and safeguarding risks are reduced.

Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)>



Record keeping

All low-level concerns will be recorded in writing. Records will include the details of the concern raised, the context in which the concern arose, the rationale for decisions and any action taken.

Records will:

- Comply with the Data Protection Act 2018 and UK GDPR.
- Be kept confidential and held securely
- Be reviewed to help identify any potential concerning, problematic or inappropriate behaviour patterns. If a pattern of such behaviour is identified, the school will decide on a course of action, either through disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in [Section 1](#) of this Appendix, a referral will be made to the designated officer at the local authority
- Be retained at least until the individual leaves employment at the school

In the case of a low-level concern relating to a supply teacher or contractor, the school will notify the individual's employer to identify any potential patterns of inappropriate behaviour.

References

Low-level concerns will not be included in references unless:

- The concern is found to be substantiated and met the threshold for referral to the designated officer at the local authority; and/or
- The concern relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: Specific safeguarding issues

Children missing from education

All staff must be aware that children going missing from education can be a vital warning sign of a range of safeguarding concerns, including abuse, neglect, sexual abuse or exploitation, child criminal exploitation, travelling to conflict zones, female genital mutilation (FGM), forced marriage, or 'honour'-based abuse. This risk is heightened if the child goes missing repeatedly. Staff should be aware that children who are persistently absent, severely absent, or frequently absent from education may also be at increased safeguarding risk.

Particular groups at risk include:

- Children at risk of harm or neglect
- Children at risk of forced marriage or FGM
- Children from Gypsy, Roma, or Traveller communities
- Children from families of service personnel
- Children who go missing or run away from home or care
- Children supervised by the youth justice system
- Children who cease to attend a school unexpectedly
- Children from new migrant families

Take 2 Cornwall follows the local authority's CME procedures and will:

- Report to the local authority when a child's name is to be removed from the admission register at a non-standard transition point, in line with the Education (Pupil Registration) (England) Regulations 2006.
- Make immediate referrals to children's social care (and the police if appropriate) if there is reason to believe a child is suffering or likely to suffer harm.

All staff receive training on spotting signs and individual triggers, including those linked to CME.



Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility.

Community safety incidents may include:

- Approaches by strangers
- Attempts to lure children into cars
- Abductions (including parental abduction)
- Other risks within the local area

Staff should be alert to:

- Reports from pupils of being followed or approached
- Changes in behaviour indicating fear of travelling to or from school
- Knowledge of recent police alerts or community reports

Take 2 Cornwall will:

- Share age-appropriate safety messages with pupils (e.g., “stranger danger”, safe travel routes)
- Communicate promptly with parents about known incidents in the local area
- Liaise with the police and local safeguarding partners where risk is identified

Children and the Court System

Children may need support if they:

- Have to give evidence in criminal courts (as victims or witnesses)
- Are involved in family courts due to parental separation, care proceedings, or custody disputes

Take 2 Cornwall will:

- Use resources such as *Ministry of Justice guidance* for young witnesses
- Offer pastoral support and signpost to specialist services (e.g., Witness Service, CAFCASS)
- Liaise with parents/carers and relevant agencies while maintaining confidentiality as required



Children with Family Members in Prison

Children who have a parent or close family member in prison may experience stigma, isolation, and emotional distress, and may be at increased safeguarding risk.

Take 2 Cornwall will:

- Maintain confidentiality while ensuring staff directly involved with the child are aware of the circumstances
- Provide targeted pastoral and mental health support
- Signpost to charities such as *Barnardo's* or *PACT* who specialise in support for children of prisoners
- Work with parents/carers, probation services, and other professionals to maintain stability and routine for the child

Child criminal exploitation - including County Lines

Child criminal exploitation (CCE) is a form of abuse that occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity. This may be in exchange for something the child needs or wants, or for the financial or other advantage of the perpetrator.

County lines is a specific form of CCE. It refers to the criminal exploitation of children and vulnerable adults by gangs and organised criminal networks to transport, store, and sell illegal drugs across different areas, often using dedicated mobile phone “lines”. Exploitation may involve:

- Moving children between locations to deliver drugs or money
- Using children’s homes as bases for criminal activity (“cuckooing”)
- Threatening violence towards the child or their family
- Taking control of the child’s phone, travel, and movements

Children exploited in county lines activity are often exposed to physical, emotional, and sexual abuse, and are at high risk of serious violence and criminalisation.

Take 2 Cornwall knows that different forms of harm often overlap and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection) and/or will be to the

perpetrator or facilitator's financial benefit or another advantage, such as increased status.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

Group-based sexual exploitation may involve networks of perpetrators targeting multiple children simultaneously, both online and offline. Children may not recognise themselves as victims, particularly where exploitation involves perceived relationships, status, gifts, substances or belonging.

Whilst the age of the child may be a contributing factor for an imbalance of power, there is a range of other factors that could make a child more vulnerable to exploitation, including sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Indicators of CCE (including county lines) can include a child:

- Appearing with unexplained gifts, money, or new possessions
- Associating with other young people involved in exploitation
- Suffering changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education
- Travelling alone to places far from home, particularly on public transport
- Being found in accommodation they have no connection to, or in “trap houses”
- Having more than one mobile phone or SIM card
- Being in contact with controlling or older individuals
- Unexplained taxi journeys
- Use of encrypted messaging apps



If a staff member suspects CCE or county lines, this will be discussed with the DSL. The DSL will make a referral to the local authority's children's social care team and the police, if appropriate, triggering the local safeguarding procedures.

Modern Slavery and Trafficking

Modern slavery encompasses human trafficking, slavery, servitude, and forced or compulsory labour. It is a form of abuse and exploitation that can affect both children and adults, where individuals are controlled, coerced or deceived for another person's gain.

Children may be trafficked into the UK or within the UK for purposes including sexual exploitation, forced labour, domestic servitude, or criminal activity.

Modern slavery may overlap with criminal exploitation, sexual exploitation, county lines activity and debt bondage.

Possible indicators include:

- Evidence of control by another person
- Signs of physical abuse or untreated injuries
- Fearful, withdrawn behaviour or reluctance to speak
- Lack of access to education
- Involvement in work or activities inappropriate for their age

If staff suspect a pupil may be a victim of modern slavery, they will:

- Immediately inform the DSL
- Follow the *National Referral Mechanism* process via children's social care
- Liaise with the police where appropriate

Cybercrime

Cybercrime is criminal activity committed using computers or the internet. Children can be both victims and, sometimes unknowingly, perpetrators.

Types include:

- Hacking
- Distributed Denial of Service (DDoS) attacks
- Making, possessing, or distributing indecent images of children



- Cyberbullying, harassment, and online fraud

Children vulnerable to cybercrime may have:

- Advanced technical skills for their age
- Significant interest in computing and coding without an understanding of the law
- Poor online boundaries and risk awareness

Take 2 Cornwall will:

- Educate pupils about online risks as part of our computing and PSHE curriculum
- Use the *Online Safety Act 2023* principles to ensure filtering and monitoring systems are robust
- Work with police and agencies such as the *Cyber Choices* programme where a child is at risk of offending

Child sexual exploitation

CSE is the process where any child under the age of 18, is exploited for sexual purposes. It is a form of child abuse where the child receives something, e.g., affection, gifts, drugs, alcohol, cigarettes, money or accommodation due to performing and or allowing others to perform on them sexual activities. They may be knowingly or unknowingly coerced into sexual activity inappropriate for their age.

In the UK, the law defines a child as a person under the age of 18. Even though the legal age of consent to sexual activity is age 16, due to the abusive nature, CSE applies to all children up to the age of 18.

Sexual activity is a broad term but includes watching sexual acts, inciting sexual activity and penetrative sexual acts. Sexual activity involving children under 13 is unlawful as they are deemed not to have the legal capacity to consent to such activity. Sexual activity which involves children under the age of 16 is illegal. However, a court will consider the circumstances of peer-to-peer sexual activity.

HM Government guidance defines sexual abuse as:

"Involving, forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening."

This definition has been expanded to highlight that:

"It can also occur through the use of technology without the child's immediate recognition, e.g., the persuasion to post sexual images on the Internet / mobile phones with no immediate payment or gain".

And that:

"In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and or other resources."

The prevalence and availability of technology provide a further medium where abusers can exploit children. It is illegal to take, possess or share indecent images of anyone under 18, even if they are the person in the picture. The term indecent applies to images of a naked person, a topless girl or if genitals or sex acts (including masturbation) are displayed.

Recent statistics show that the age of online service users is getting younger, which places more children at risk of CSE abuse. This access to technology, social networking sites and mobile devices offers the abuser further mediums to groom, coerce, blackmail and exert control.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This includes both face-to-face and online behaviours, and may occur simultaneously across both contexts. Online forms include abusive, harassing, and misogynistic messages; non-consensual sharing of nude or semi-nude images; coercion into sexual activity via digital platforms; and exposure to pornography without consent.

Our school has a zero-tolerance approach to sexual violence and sexual harassment and recognises that even if there are no reports, this does not mean that this kind of abuse is not happening here.

The school recognises that harmful sexual behaviour can occur both online and offline, including behaviour involving the creation or sharing of AI-generated sexual images or manipulated imagery. Staff understand the safeguarding implications of technology-assisted harmful sexual behaviour.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes referred to as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including any online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (including any online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (sometimes referred to as sexting or youth-produced sexual imagery)
- Upskirting, which usually involves the taking of photographs under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation and distress
- Initiation/hazing type violence and rituals (including activities involving harassment, abuse or humiliation used as a way of initiating a person into a group/gang and may also be online)

Child-on-child online abuse can take the form of, for example messages which are abusive, harassing and/or misogynistic, the non-consensual sharing of indecent images, and the sharing of abusive images and pornography to those who don't want to receive such content.



Take 2 Cornwall also recognises the risks associated with online misogyny, harmful gender stereotypes, incel ideology and other forms of prejudice-based online content. Such content can contribute to harmful attitudes, sexual harassment, sexual violence and abusive behaviour. Staff should report concerns regarding exposure to or promotion of such content to the DSL.

Staff will follow the procedures set out in the [Recognising abuse and taking action](#) section of this policy if they have any concerns about child-on-child abuse or if a child makes a report to them. Take 2 Cornwall's approach to this type of abuse can be seen in sections [Allegations of abuse made against other pupils](#) and [Sharing of nudes and semi-nudes](#) of this policy.

Take 2 Cornwall will always consider the ages and stages of development of students when considering instances of harmful sexual behaviour between children. Our school recognises that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer appropriate support.

Domestic abuse

Under the Domestic Abuse Act 2021, domestic abuse is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Witnessing domestic abuse is recognised as a form of child abuse. Children may experience domestic abuse directly, witness it, overhear it, observe its effects, or experience the impact through changes in family functioning and emotional wellbeing. Whilst the majority of cases feature abuse by a partner or ex-partner, domestic abuse can also be perpetrated by a family member or carer. Such abuse may occur on a one-off incident or as a pattern of incidents which may include:

- Coercive and controlling behaviour
- Threatening behaviour
- Violent behaviour
- Sexual violence
- Degrading behaviour where the victim is made to feel worthless
- Harassment
- Stalking
- Financial or economic abuse

- Online / digital abuse.

Domestic abuse can happen in any relationship and can continue even after a relationship has ended. Such behaviour is not limited to incidents inside the home and may occur in public situations via smartphones, social networking and the internet. It is important to remember that both women and men may be victims and perpetrators. Witnessing any form of domestic abuse can seriously harm children and young people; this is recognised as a form of child abuse.

The school participates in **Operation Encompass** where applicable. Information shared by police following domestic abuse incidents will be treated as a safeguarding concern and used to provide timely support for affected children.

The DSL will provide support according to the child's needs and update records about their circumstances.

Teenage relationship abuse

Teenage relationship abuse includes controlling, coercive, threatening or violent behaviour between young people in intimate relationships. It can occur between children of any gender and may take place online as well as face to face.

This may include:

- emotional manipulation
- coercive control
- digital monitoring or excessive messaging
- pressure to share sexual images
- isolation from friends or family
- threats or intimidation
- jealous or possessive behaviour
- controlling social interactions

Teenage relationship abuse may be overlooked or misunderstood as typical adolescent behaviour. However, it can involve significant safeguarding risk and may escalate into serious harm.

Staff should report concerns to the DSL, who will assess risk and consider appropriate referral pathways, including Early Help and Family Help or statutory safeguarding intervention where required.

Financial exploitation of children

Financial exploitation involves the manipulation, coercion or deception of a child or young person in order to obtain money, financial information, access to accounts, or other items of financial value.

Children may be targeted directly or indirectly through peer groups, social media, online gaming platforms or other digital environments.

Financial exploitation may involve criminal networks, individuals known to the child, or people posing as peers or trusted contacts online.

Examples may include:

- online scams targeting children or young people
- coercion or pressure to transfer money or share banking details
- exploitation through gaming platforms, including pressure to purchase items or transfer digital assets
- romance scams or emotional manipulation targeting older pupils
- being persuaded or coerced into allowing bank accounts to be used for money laundering (“money muling”)

Financial exploitation may occur alongside other forms of abuse, including criminal exploitation, sexual exploitation, online grooming or emotional abuse.

Staff should report concerns to the DSL, who will consider appropriate safeguarding responses, including Early Help, Family Help or referral to statutory services where appropriate.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare.

The DSL and DDSL(s) will be aware of contact details and referral routes to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and per local procedures).

The DSL will also refer to children's social care where a child has been harmed or is at risk of harm.

So-called ‘honour-based’ abuse (HBA)

HBA, sometimes called honour crime or izzat, is a term used to describe practices used to control a person’s behaviour in family or community settings to protect perceived cultural or religious beliefs. HBA includes incidents or crimes committed to protect or defend the honour of a family or community, and can include FGM, forced marriage, and other abuses. It can affect both males and females. HBA occurs when a perpetrator acts violently on a relative they believe has brought shame upon the family or community by breaking the perceived honour code.

Such action may include:

- Domestic and / or sexual violence
- Forced marriage
- Female Genital Mutilation (FGM)
- Abduction
- Murder

All forms of HBA violate a person’s rights. It is a form of abuse. The factor distinguishing HBA from other types of abuse is the approval and/or collusion of the victim’s family or community.

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Female Genital Mutilation (FGM)

FGM is a form of child abuse that can lead to extreme and lifelong physical and psychological suffering for women and girls. FGM comprises all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. Generally, girls undergo female genital cutting from around the age of 3. However, this may vary depending on the type of ritual / custom of the local village, region or belief system.

[If you discover that FGM has taken place or a pupil is at risk of FGM](#), this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place

- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - o Having difficulty walking, sitting or standing, or looking uncomfortable
 - o Finding it hard to sit still for long periods (where this was not a problem previously)
 - o Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - o Having frequent urinary, menstrual or stomach problems
 - o Avoiding physical exercise or missing PE
 - o Being repeatedly absent from school or absent for a prolonged period
 - o Demonstrating increased emotional and psychological needs - for example, withdrawal or depression, or significant change in behaviour
 - o Being reluctant to undergo any medical examinations
 - o Asking for help but not being explicit about the problem
 - o Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family has a history of practising FGM (this is the biggest risk factor to consider)
- FGM is known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - o Having a mother, older sibling or cousin who has undergone FGM
 - o Having a limited level of integration within UK society
 - o Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

- o Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- o Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- o Talking about FGM in conversation - for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- o Being unexpectedly absent from school
- o Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forced Marriage is when one or both parties do not fully or freely consent to the marriage but are subjected to physical and or emotional pressure to marry. This may be in the form of coercion, threats, violence or emotional / psychological pressure. Forced marriage also applies to a marriage involving a person without the capacity to consent to the marriage, as defined in the Mental Capacity Act 2005, whether or not coercion or the above measures are used. This includes persons with physical or learning disabilities. Whatever form used, pressure which forces someone into a marriage is an abuse of their human rights and is a crime.

The term marriage applies to any religious or civil ceremony, whether or not legally binding. It is important to distinguish between forced marriage and arranged marriage. In an arranged marriage, families may actively select a partner for a family member; however, both spouses fully consent to the marriage.

Staff will receive training about forced marriage and the presenting symptoms. The school is aware of the '1 chance' rule, i.e., we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a staff member suspects that a student is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the child about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fcdo.gov.uk
- Refer the child to an education welfare officer, pastoral tutor, mentor as appropriate

Preventing radicalisation

Radicalisation- is defined by the Home Office as:

"The support of terrorism and extremist ideologies associated with terrorist groups".

Extremism - is defined by the HM government as

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

- (1) negate or destroy the fundamental rights and freedoms of others; or*
- (2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or*
- (3) intentionally create a permissive environment for others to achieve the results in (1) or (2)."*

Terrorism- is defined by The Terrorism Act 2000 as

"...the use or threat of one or more of the actions listed below, and where they are designed to influence the government, or an international governmental organisation or to intimidate the public. The use or threat must also be to advance a political, religious, racial or ideological cause."

The specific actions included are:

- Serious violence against a person
- Serious damage to property



- Endangering a person's life (other than that of the person committing the action)
- Creating a serious risk to the health or safety of the public or a section of the public; and
- Action designed to interfere with or seriously disrupt an electronic system.

Schools and alternative provisions such as Take 2 Cornwall must prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and ensure that staff can access appropriate training to identify children at risk.

Take 2 Cornwall will assess the risk of children in our setting being drawn into terrorism. This assessment will also consider the potential risk in our local area in collaboration with our local safeguarding partners and police force.

In line with the Online Safety Act 2023, Take 2 Cornwall will ensure that our filtering and monitoring systems are effective in restricting access to harmful content and that pupils are educated about online radicalisation risks.

There is no single way of identifying an individual susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger

- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups or justification for their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining or seeking to join extremist organisations

It is important to note that these signs can also be part of normal teenage behaviour; however, children at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. Take 2 Cornwall encourages staff to have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures in the [If you have concerns about extremism](#) section of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur:

- Between 2 children, regardless of age and sex
- Through the sexual assault or sexual harassment of a single child or group of children by a group of children
- Both physically and verbally, online and/or face to face

There is a continuum of sexual violence and sexual harassment that may overlap.

Victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. Their educational attainment will be adversely affected and exacerbated if the alleged perpetrator(s) attends the same school.

Staff must reassure any victim who reports an incident that they are being taken seriously and will be supported and kept safe. At no point should a victim feel that they have created a problem by reporting abuse or neglect, nor should they feel any shame for reporting.

Staff will support victims by:

- Ensuring victims are reassured that the law on child-on-child abuse is there not to criminalise them but to protect them
- Ensuring decisions and actions are reviewed regularly, and policies are updated with any lessons learnt
- Ensuring that any potential patterns of concerning, problematic or inappropriate behaviour are looked out for with a course of action implemented where any patterns are identified
- Ensuring that consideration is given to any wider cultural issues within the school that have enabled the inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Ensuring that they remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs

Some groups are potentially more at risk, such as girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children.

Staff should always:

- Challenge behaviours which are inappropriate
- Ensure they make it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and is not a 'normal' part of growing up
- Challenge physical behaviours (potentially criminal), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. It is not acceptable to dismiss or tolerate such behaviours as this risks normalising them

Staff will follow the procedures set out in the [Recognising Abuse and taking action](#) section of this policy if a child makes a report to them or they have any concerns about sexual violence or sexual harassment. The section [Allegations of abuse made against other pupils](#) and [Sharing of nudes and semi-nudes](#) gives our school's approach to this type of abuse.

Serious violence

Children who are involved in, or at risk of, serious violence may display a range of indicators. These can include:

- Increased absence, persistent absence or severe absence from school.
- Changes in friendships or associations, including relationships with older individuals, groups or gangs.
- A significant decline in educational performance, engagement or attainment.
- Significant changes in emotional well-being, behaviour or presentation, including signs of self-harm
- Unexplained injuries, signs of assault or repeated involvement in violent incidents.
- Unexplained gifts, money or new possessions (indicating that the child is involved with, or has been approached by, individuals in criminal networks or gangs and may be at risk of criminal exploitation)
- Possession of, access to, or discussion about weapons.
- Threats involving violence or expressions of intent to cause harm to others.
- Travelling to areas with no obvious connection to the child or spending time away from home without explanation.

Here are the risk factors which increase the likelihood of involvement in serious violence:

- Persistent absence, severe absence or exclusion from education.
- Previous experience of abuse, neglect, exploitation or child maltreatment.
- Previous involvement in offending behaviour.
- Association with individuals involved in criminal activity.
- Exposure to domestic abuse, violence or adverse childhood experiences.
- Vulnerability to child criminal exploitation, including county lines activity.

These indicators and risk factors are shared with staff through safeguarding training. Staff should be aware that the presence of one or more indicators does not necessarily mean a child is involved in serious violence; however, concerns should always be explored.

Where a member of staff is concerned that a pupil may be involved in, vulnerable to, or at risk from serious violence, they must report this to the DSL without delay. The DSL will consider appropriate safeguarding action, including referral to children's social care, the police or other relevant agencies where necessary.



Checking the identity and suitability of visitors

Upon visiting our setting, all visitors must verify their identity to the satisfaction of staff and leave their belongings, including their mobile phone(s), in a safe place.

Where a visitor is not known to Take2 Cornwall, office staff will check their credentials and the reason for their visit before allowing them to enter. Take 2 Cornwall will check the identification of all visitors.

Visitors must sign as per our Take 2 Cornwall system and wear the visitor's badge given to them.

Any visitor attending for a professional purpose will be asked to show a photo ID and:

- Provide evidence that the appropriate safeguarding and vetting checks have been completed, where required; or
- Provide written confirmation from their employer or organisation that the appropriate level of DBS and other relevant safeguarding checks have been carried out.

Staff members will accompany all other visitors, including visiting speakers, at all times throughout their visit.

Appendix 5: Guidelines on checking the online presence of job applicants.

In line with KCSIE, as part of the shortlisting process, Take 2 Cornwall will consider conducting an online search (including social media) for shortlisted candidates. This forms part of our due diligence to help identify any incidents or issues that are publicly available online, which we may wish to explore with the applicant at interview.

The purpose of such searches is to support the identification of suitability to work with children and to help ensure that we do not appoint anyone who may pose a risk to pupils or raise concerns about their suitability to work with children and young people.



1. Why it is relevant?

Take 2 Cornwall will use online checks for evidence of:

- Inappropriate or offensive behaviour, language or jokes
- Comments of a discriminatory nature
- Inappropriate photographs or content
- Misuse of drugs or alcohol
- Any conduct that calls into question their suitability to work with children
- Behaviour or content that may indicate poor professional judgement or raise concerns about professional boundaries.
- Publicly available information that may suggest attitudes inconsistent with safeguarding responsibilities or the school's values.

2. Where to look

Take 2 Cornwall will only review information that is publicly available and will not attempt to access private, restricted or password-protected content.

Searches may include, but are not limited to:

- Internet search engines (e.g., Google)
- Social media platforms (e.g., Facebook, X/Twitter, Instagram, TikTok, YouTube)

The extent of any online search will be proportionate to the role and the information publicly available.

3. Who undertakes the search

To minimise the risk of discrimination and ensure fairness, online searches will be carried out by an individual who is not directly involved in the recruitment decision-making process. Any information identified through the search will be reviewed and only relevant safeguarding or suitability concerns will be shared with the recruitment panel.

Only information that is relevant to safeguarding, professional conduct or suitability to work with children will be shared with the recruitment panel. Information that is not relevant to the recruitment process, including protected characteristics such as age, sex, gender reassignment, race, religion or belief, disability, marriage or civil



partnership, pregnancy or maternity, or sexual orientation, will not be shared or taken into account.

4. Use and storage of information

- Any information identified will be reviewed and, if appropriate, discussed with the candidate at interview.
- All information will be processed in accordance with the Data Protection Act 2018 and UK GDPR.
- A record will be maintained that the online search has been completed and any relevant findings considered.
- Any information retained as part of the recruitment process will be stored securely, accessed only by authorised personnel and retained only for as long as necessary in accordance with the school's data retention procedures, after which it will be securely disposed of.

This policy was adopted by: Take 2 Cornwall	Date:01.09.2026 PJE
To be reviewed: 31.07.27	Signed: