PENAIR SCHOOL

DISCE UT VIVAS

Child Protection and Safeguarding Policy (including Safer Recruitment, Allegations Against Staff and Low-Level Concerns)

Policy holder:	Lisette Neesham
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SECTION 1: INTRODUCTION

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

This policy is available on our school website and at request from our school office. We inform parents and carers about it when their children join our school, and this policy is shared with all staff (including temporary staff and volunteers) at the point of induction and on an annual basis alongside our Staff Code of Conduct.
In addition to this, all staff read and understand the contents of Part One of Keeping children safe in education (KCSiE) 2026, with DSL's and DDSL's reading the entirety of its content.

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

Links with Other Policies

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

Whistleblowing
Behaviour
Staff Code of Conduct
Restrictive interventions including the use of reasonable force
Attendance
Artificial Intelligence
Supporting pupils with medical conditions
Allergy policy
Online Safety

And National guidance/legislation, including:
Keeping Children Safe in Education 2026
Working together to safeguard children 2026
Cornwall and the Isles of Scilly Safeguarding Partnership website

What to do if you are worried a child is being abused
Working together to improve school attendance
Behaviour in Schools - Advice for headteachers and school staff Feb 2024
Information sharing advice for safeguarding practitioners
Convention on the Rights of the Child
When to call the police - guidance for schools and colleges
Families First Partnership programme
Children's Wellbeing and Schools Bill - Child's rights impact assessment
Crime and Policing Act 2026
Data (Use and Access) Act 2025

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

This safeguarding policy has been individualised to reflect the unique characteristics and contextual setting of Penair School.

SECTION 2: LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation)
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation
- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse
- The Crime and Policing Act 2026, which introduces mandatory reporting duties for all staff regarding child sexual abuse
- The Children's Wellbeing and Schools Bill 2026, which includes Benedict's Law regarding allergy management in schools
- The Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, which govern how we handle personal information

This policy refers to locally agreed multi-agency procedures that have been put in place by the school's 3 safeguarding partners. This policy reflects Cornwall and the Isles of Scilly Safeguarding Partnership procedures.

SECTION 3: DEFINITIONS

Safeguarding and promoting the welfare of children means:

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

- Taking action to enable all children to have the best outcomes

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

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards for an area within the LA
- The chief officer of police for an area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

SECTION 4: THE ROLE OF ALL STAFF IN KEEPING CHILDREN SAFE

All staff know who the DSL/DDSL is at Penair School and understand that as well as being the expert in this field, they are there to support staff, volunteers and the governing body.
All staff have read and have a good understanding of Part 1 of Keeping Children Safe in Education 2026 and are aware of its link to other policies within our school and across our Trust.

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

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

All staff understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Filtering and monitoring training takes place at the point of induction and is updated on an annual basis. Training is specific to the systems used within Penair School, so staff understand the role they play in raising awareness and being vigilant and alert to weaknesses in the system.

All staff receive safeguarding and child protection (including online safety) updates regularly and at least annually, to ensure they have the relevant skills and knowledge to safeguard children effectively every day. At Penair School we use a range of innovative ways of embedding staff knowledge - e.g., weekly briefings, staff meetings, email bulletins.
All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse online as well as face to face. They know that in many cases abuse and other risks will take place concurrently both online and offline. Staff are aware that children can abuse other children online; this can take the form of abusive, harassing, and/or misogynistic/misandrist messages, the sharing of self-generated intimate images and/or videos (including those generated using AI), especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

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

All staff understand that extra familial harms take a variety of forms and children can be vulnerable to multiple harms at one time including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

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

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

All staff know we are proud members of Operation Encompass and help us to respond quickly and appropriately to any information shared by police.
All staff are aware of the mandatory reporting duties under the Crime and Policing Act 2026 and report any known or suspected case of child sexual abuse. They understand it is also a crime to prevent someone else from reporting. All staff know they will be supported by the DSL to fulfil this duty.

All teachers are aware of their mandatory reporting duties under the Serious Crime Act 2015 to report all known or suspected cases of FGM to police and to the MASSH.

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

All staff know what to do if a child tells them they are being abused, exploited, or neglected and are confident to deal with disclosures. Staff know how to maintain an appropriate level of confidentiality by only involving those who need to be, such as the DSL/DDSL and local authority children's social care. Staff never promise a child they will not tell anyone about a report of abuse, understanding that ultimately this will not be in the best interests of the child. All staff are aware of the early support and family help process in Cornwall and understand their role in it. They are confident to identify and support children and families who may benefit. All staff are aware they hold privileged positions at Penair School to identify concerns early, provide help for children and families, promote children's welfare and prevent concerns from escalating.

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

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

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

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

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

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

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

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

SECTION 5 - ARTIFICIAL INTELLIGENCE (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Penair School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (for example, bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Penair School will treat any use of AI to access harmful content or bully pupils in line with this policy, the AI policy and our behaviour policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE) 2026.

AI and Online Safety

Our online safety training includes awareness of:

- AI-generated content risks: Including deepfakes, deep nudes, and AI-manipulated images/videos
- AI chatbot interactions: Understanding that AI companions and roleplay bots can simulate harmful interactions and grooming dynamics

- Misinformation and disinformation: How AI can generate convincing fake news and conspiracy theories
- AI-facilitated abuse: How perpetrators may use AI tools to create, manipulate or share harmful content
- Our filtering and monitoring systems are configured to identify AI-related risks, and staff are trained to recognise when pupils may be accessing or creating AI-generated content that raises safeguarding concerns.
- Any safeguarding concerns related to AI use will be reported to the DSL immediately and handled in accordance with our child protection procedures.
- Guidance:
- Generative artificial intelligence (AI) in education - GOV.UK

SECTION 6: PUPILS WITH MEDICAL CONDITIONS

An incident relating to the management of a child's medical condition (including allergies and conditions requiring delegated healthcare tasks) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

Benedict's Law 2026: Allergy Management

In line with Benedict's Law 2026 (Children's Wellbeing and Schools Bill), Penair School has the following in place:

Whole-School Allergy Policy: Our school has adopted and published a comprehensive, standalone allergy policy which is available on our website and from the school office.

Mandatory Staff Training: All staff at Penair School have received annual allergy awareness and anaphylaxis training so they can confidently recognise symptoms and administer emergency treatments. This training is refreshed annually and records are maintained by School Business Manager.

Emergency Medication: Our school stocks "spare" emergency adrenaline auto-injectors (AAIs) on site to be used on any child or adult experiencing anaphylaxis. These are stored in our main reception and all staff are aware of their location.

Individual Care Plans: Penair School implements specific Individual Healthcare and Allergy Action Plans for any pupil diagnosed with a severe allergy. These plans are developed in partnership with parents/carers, the pupil (where appropriate), and relevant healthcare professionals. All staff who work with the pupil are made aware of the plan and their responsibilities within it.

For more details, please see our Children with Medical Conditions Policy and our Allergy Policy.

SECTION 7: PUPILS WHO ARE QUESTIONING THEIR GENDER

7.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

Penair School will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.
When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach. The DSL will lead in these cases.

7.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

7.3 Considering requests for support with social transition

Penair School will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children. Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE) 2026).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children.

Penair School will make decisions in line with the following principles:

The school has statutory duties to safeguard and promote the welfare of all children: The first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes.

Parents and carers should be actively involved and their views treated with importance: (Except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school, parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered.

Accommodating social transition is an active intervention so the school will take a very careful approach: Social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes. We are aware of evidence from the Cass Review that noted children who socially transition before puberty are more likely to proceed to a medical pathway than those who do not.

The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition.

Clinical and Professional Involvement

We keep in mind the emphasis in the Cass Review on early clinical involvement when families are considering social transition for pre-pubertal children. Where appropriate, we will encourage families to seek clinical advice and will consider any clinical evidence or advice provided when making decisions.

We will also seek advice from any additional non-clinical professional where relevant (for example the SENCO) and the DSL will always be involved in decision-making.

- Recording and Review
- Penair School will ensure that the decision-making process is documented and records are kept in the child's safeguarding file. This will include:
- The request made and by whom
- Discussions held with the child and parents/carers
- Any professional advice sought or received
- The decision made and rationale
- Any risk assessments completed
- Support plans put in place

The circumstances or needs of a child may change over time, and the school may need to review its original decision. The DSL will be involved in any review.

7.4 Rules on single-sex spaces

In line with the Supreme Court ruling on the definition of sex (2025) and our safeguarding obligations:

Pupils are not allowed into toilets, changing rooms, or showers designated for the opposite biological sex, with no exceptions.

Penair School provides separate toilets for boys and girls aged 8 and over (apart from individual toilets in a room that can be locked from the inside, intended for use by one pupil at a time), as required by the School Premises (England) Regulations 2012.

Where we make any special arrangements for children (for example, use of a separate disabled toilet or separate accommodation at their request), this will be recorded in the child's safeguarding file.

Residential Trips

Pupils are not allowed into boarding/residential accommodation designated for the opposite biological sex during any school residential trip, with no exceptions. Where special arrangements are made, these will be documented.

7.5 Rules on single-sex sports

Penair School may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

7.6 Support for pupils

Penair School is committed to providing a supportive environment for all pupils, including those questioning their gender. We will:

- Ensure pastoral support is available
- Challenge any bullying or discriminatory behaviour
- Maintain respectful relationships with all pupils and families
- Work collaboratively with parents/carers
- Seek appropriate professional advice when needed
- Keep the child's welfare at the centre of all decisions

SECTION 8: MOBILE PHONE USE

Mobile Phone-Free Environment

The DSL ensures Penair School is a mobile phone-free environment where pupils do not have access to their mobile phone throughout the school day including during lessons, time between lessons, breaktimes and lunchtime.

Exceptions

The only exceptions to this are pupils whose medical needs require them to have a mobile phone on their person (for example, to monitor blood glucose levels). When this is the case, this is documented in the child's healthcare plan and safeguarding file and is known by all staff within our school.

Staff Responsibilities

All staff at Penair School:

- Understand and enforce the mobile phone-free policy
- Challenge any pupil seen using a mobile phone during the school day
- Confiscate mobile phones in line with our searching, screening and confiscation policy
- Report repeated breaches to Senior Leadership Team
- Storage

Pupils who bring mobile phones to school must keep them off and in their bags.

For full details, please see our Mobile Phone Use Policy.

SECTION 9: FAMILY HELP AND EARLY SUPPORT

Cornwall's Early Support and Family Help

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

- Universal Services / Community-based Early Support
- Universal or community-based early support are those that are accessible to all parents/carers and their children. At Penair School, we provide early support in a variety of ways including:
- Pastoral support sessions
- Counselling services
- Homework clubs
- Breakfast club

- Food bank referrals
- Signposting to local charities

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

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

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

Targeted Early Help (Family Help)

For some families, early support may not be sufficient, and a period of targeted help may be required instead. All staff at Penair School are aware of the family help process and understand their role in it. This includes being vigilant and identifying emerging problems, liaising with the DSL/DDSL and sharing information with other professionals to support the early identification and assessment of a child's needs. In some cases, and where parents agree, they may also act as the lead professional in a family help assessment.

All staff receive training around the importance of all elements of family help, including targeted early help and child in need as part of Level Two training and are reminded about it in separate updates.
Any child may benefit from targeted early help; however, staff at Penair School are particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines

- Is frequently missing/goes missing from education, home or care
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school, or is in Alternative Provision or a Pupil Referral Unit
- Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child or a child in kinship care

Child in Need - Section 9(Family Help)

Child in need forms part of Cornwall's family help offer and is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.
As outlined in Working Together to Safeguard Children 2026, the local authority in Cornwall, together with their safeguarding partners and relevant agencies, have developed, agreed and published local protocols for assessments and support. In line with this guidance, assessments at this level may be led by a family support worker with the supervision of a social worker.

If the DSL at Penair School considers the concerns they have for a pupil indicate that a Child in Need assessment is appropriate, they will speak with parents and/or carers and obtain their consent for a referral into Cornwall's Multi-agency Support and Safeguarding Hub (MASSH). In circumstances where parents refuse to give consent, but the child's needs are not being met, the DSL will discuss this with the MASSH. Appropriate school staff will attend Child in Need (CIN) meetings convened by Children's Social Care.

Guidance documents:
Family Help - Cornwall Council

SECTION 10: CYBER SECURITY

Cyber Security Standards

The DSL at Penair School takes lead responsibility for information security and access management, ensuring we have the appropriate level of security protection measures in place. This strengthens resilience, reduces the risk of disruption, prevents data breaches, and mitigates against safeguarding risks.

The DSL reviews the effectiveness of these procedures periodically (at least annually) to keep up with evolving cyber-crime technologies and oversees any relevant actions.

Our cyber security measures include:

- Regular password updates
- Multi-factor authentication
- Staff training on phishing and cyber threats
- Secure backup systems
- Incident response procedures
- Regular software updates and patches
- Teaching about Cyber Security
- The DSL ensures our children are educated on topics including:
- Misinformation and disinformation (including fake news)
- Conspiracy theories
- How to identify suspicious online content
- Safe password practices
- Recognising phishing attempts
- Protecting personal information online
- Staff Training
- All staff at Penair School receive regular cyber security training covering:
- Recognising and reporting phishing emails
- Safe use of school systems and devices
- Data protection responsibilities
- Incident reporting procedures
- Use of personal devices for school work

- Data Breach Procedures

Any suspected data breach must be reported to Data Protection Officer/School Business Manager within 48 hours. The DSL will assess whether the breach has safeguarding implications and take appropriate action.

Guidance:
Cyber security standards for schools and colleges
Cyber Security Training for School staff
Meeting digital and technology standards in schools and colleges

SECTION 11: FILTERING AND MONITORING

Our Filtering and Monitoring Systems

Penair School has appropriate filtering and monitoring systems in place on school devices and school networks. These systems are designed to:

- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Identify risks related to the four categories of online harm: Content, Contact, Conduct, and Commerce
- Monitor for AI-related risks including deepfakes, AI-generated harmful content, and chatbot interactions
- Alert designated staff to potential safeguarding concerns

Roles and Responsibilities

The following roles have been identified and assigned for managing our filtering and monitoring systems:
Overall responsibility: Mr James Davidson, Headteacher
Day-to-day management: Mr Tony Hill, ICT Technician
Safeguarding oversight: Mrs Lisette Neesham, DSL
Monitoring alerts: Mr Tony Hill, ICT technician and ICT4 external IT support.

Review and Effectiveness

Our filtering and monitoring provisions are reviewed at least annually by our IT Strategic team with the support of the DSL and IT team. This is also covered in our IT Services Information

Security Policy, reviewed annually by governors. The filtering and monitoring provisions review includes:

- Checks that filtering is working appropriately on all internet-connected devices in all relevant locations
- Assessment of whether the systems are blocking harmful content effectively
- Review of monitoring alerts and how they have been responded to
- Consideration of any incidents that occurred despite filtering/monitoring
- Discussion with IT staff and service providers about improvements needed
- A record of these reviews is kept and reported to the governing body.

Staff Awareness

All staff at Penair School:

- Receive training on filtering and monitoring at induction and annually
- Understand what content is filtered and why
- Know how to report concerns about filtering (e.g., educational content being blocked)
- Understand their role in monitoring pupil online activity
- Know how to respond to monitoring alerts
-

Responding to Alerts

Monitoring alerts are received by Mr Tony Hill (IT support) and ICT4 (external IT support) who review them for any safeguarding or behavioural concerns. Any alerts indicating potential safeguarding concerns are immediately forwarded to the DSL via MyConcern. Alerts are logged and a record is kept on the student's MyConcern file.

Guidance:
Filtering and monitoring standards for schools and colleges
Meeting digital and technology standards in schools and colleges

SECTION 12: OPERATION ENCOMPASS

Statutory Duty

Operation Encompass statutory guidance explains that the police must notify Penair School of any incidents involving domestic abuse where a child from our school is involved, has witnessed, or been present, lives at (or is linked to) the address where it occurred, or where a

Child Concern Notification has been issued, regardless of whether the child was there at the time.

Our Procedures

The police will inform the DSL (our Key Adult for Operation Encompass) before the child or children arrive at school the following day. This notification will reflect the 'voice of the child' (for example, statements made by the child or behaviour observed).

Information Received

The notification will include:

- The police reference number
- The name, date of birth and protected characteristics of any child from Penair School who is related to any adult involved in the incident
- The relationship of the child to the victim and to the perpetrator
- The location, time and date of the incident
- If the child was present, and if so, where they were
- The voice of the child, such as what they are saying and how they are behaving

The notification will NOT include:

- Information or reference to sexual offences disclosed at the domestic abuse incident (to preserve anonymity under the Sexual Offences (Amendment) Act 1992)

Our Response

When we receive an Operation Encompass notification, the DSL will:

- Review the information and update the child's safeguarding file
- Provide appropriate support to the child according to their needs
- Monitor the child's wellbeing
- Consider whether any additional safeguarding action is needed
- Liaise with other agencies as appropriate
- Confidentiality and Data Protection

All Operation Encompass information is:

- Treated as confidential
- Held securely in line with data protection laws
- Only shared with staff who need to know to support the child
- Recorded appropriately in the child's safeguarding file

Support Available

The Operation Encompass charity provides an advice and helpline service for all staff members from education settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990.

Guidance:
Operation Encompass statutory guidance
Operation Encompass website: www.operationencompass.org

SECTION 13: MARTYN'S LAW AND PREVENT

Martyn's Law 2025 - Terrorism Protection

As we have a usual capacity of over 200 people at Penair School, we are aware and compliant with all aspects of Martyn's Law 2025. This includes:

Prevent Training: All staff receive specific Prevent training at induction and this is refreshed regularly. Training covers:

- Understanding radicalisation and extremism
- Recognising signs of vulnerability
- How to report concerns
- The Channel process
- Martyn's Law requirements

Prevent Risk Assessment: A comprehensive Prevent risk assessment is in place which is reviewed on an annual basis. This assessment considers:

- The local context and community
- Vulnerabilities within our school population
- Physical security of the premises
- Online risks
- External speakers and visitors
- Use of school premises by external groups

- Lockdown Procedures: We have lockdown procedures which are robust and practiced regularly . All staff and pupils are familiar with these procedures.

Single Point of Contact (SPOC): Our school Single Point of Contact (SPOC) is Lisette Neesham. The SPOC oversees the effectiveness of all these procedures and is the lead contact for Prevent-related matters.

In place of all the necessary requirements of this law includes:

Prevent Training: All staff receive specific Prevent training at induction and this is refreshed regularly. Training covers:

Understanding radicalisation and extremism
Recognising signs of vulnerability
How to report concerns
The Channel process
Prevent Risk Assessment: A comprehensive Prevent risk assessment is in place which is reviewed on an annual basis. This assessment considers:
The local context and community
Vulnerabilities within our school population
Physical security of the premises
Online risks
External speakers and visitors
Use of school premises by external groups

Channel Referrals

Where there is a concern that a pupil may be vulnerable to radicalisation, the DSL will consider making a referral to Channel. Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist-related activity.
Channel focuses on providing support at an early stage to people identified as being vulnerable to being drawn into terrorism. Participation in the Channel programme is entirely voluntary. Penair School has a duty to cooperate with the Channel programme and with the Police in providing information about an individual who is referred to Channel.

Guidance:
Prevent duty guidance
Channel duty guidance

SECTION 14: LOOKED AFTER CHILDREN

Penair School ensures that staff have the skills, knowledge and understanding to keep looked-after children, previously looked-after children, and children in kinship care safe.

The Designated Teacher

We have appointed a designated teacher, Lisette Neesham DSL, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

Responsibilities of the Designated Teacher

As part of their role, the designated teacher will:

Work closely with the DSL (she is the DSL) to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

Ensure appropriate staff have relevant information about children's looked-after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

Ensure the DSL has details of children's social workers and relevant virtual school heads
Extended Role of the Virtual School (from March 2024)

The responsibilities of the Virtual School (Awena in Cornwall) were extended in March 2024 to include:

- Children with a social worker
- Children who have previously had a social worker
- Children in kinship care

Penair School works closely with Cornwall's Virtual School (Awena) to:

- Promote the educational achievement of these children
- Set and report on ambitious targets to improve attendance
- Provide appropriate support and interventions
- Share information about welfare and safeguarding concerns

Kinship Care

Kinship care (sometimes referred to as "family and friends care") happens when a parent or someone else who has parental responsibility is no longer able to care for their child, and the child goes to live with a relative, friend or other connected individual.

Staff at Penair School understand the important role that kinship carers play and are aware that children in kinship care may face additional challenges. We provide appropriate support to these children and their carers.

Attachment-Aware and Trauma-Informed Practice

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

We understand that many looked-after children, previously looked-after children, and children in kinship care have experienced trauma, loss, and disrupted attachments. Our approach includes:

- Therapeutic interventions
- Consistent key adults
- Trauma-informed behaviour management
- Regular check-ins and emotional support

Guidance:
Designated teacher for looked-after and previously looked-after children
Promoting the education of children with a social worker and children in kinship care: virtual school head role extension
The Virtual School for Cornwall (Awena): www.cornwall.gov.uk/awena

APPENDIX 1 - SPECIFIC SAFEGUARDING ISSUES

Child-on-Child Abuse (Updated to include AI and misogyny/misandry)

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

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

Forms of Child-on-Child Abuse

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers (teenage relationship abuse)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence such as rape, assault by penetration including penetration by objects and sexual assault (may include an online element)
- Sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting, online sexual harassment, and physical behaviour such as deliberately brushing against someone, interfering with someone's clothes
- Consensual and non-consensual making or sharing of nudes and semi-nudes including those generated using AI (e.g., deepfakes, deep nudes)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission
- Initiation/hazing type violence and rituals

The Role of Misogyny/Misandry

Staff at Penair School recognise the intersection of misogyny/misandry and harmful sexual behaviour. We:

- Actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour
- Are alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers
- Recognise the impact this content could have on shaping pupils' attitudes
- Challenge any language or behaviour that demeans or objectifies others based on gender

The Role of AI in Child-on-Child Abuse

Staff are aware that AI can facilitate child-on-child abuse, including:

- Creation of deepfake images or videos of peers
- AI-generated nude or semi-nude images
- Use of AI chatbots to harass or impersonate others
- Spreading AI-generated misinformation about peers

Any use of AI to harm, harass, or abuse other children will be treated as a serious safeguarding concern.

Our Response

All staff understand the importance of the timely challenge of inappropriate behaviours between peers. They are aware of the importance of:

- Making clear that child-on-child abuse including sexual violence and sexual harassment is never acceptable and that we have a zero-tolerance approach
- Not dismissing this abuse as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults

All staff know that if we do not challenge and support our children, this will lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse.

We know that the initial response to a report from a child is vitally important. We reassure victims that their reports are being taken seriously and that they will be supported and kept safe. We never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment.

Support and Risk Assessment

Victims of child-to-child abuse will be supported by Penair School's pastoral system and referred to specialist agencies if appropriate. Risk assessments and/or safety planning are an integral part of this support plan, particularly regarding post-incident management.
We work closely with Gweres Kernow and other specialist services to support both victims and perpetrators of child-on-child abuse.

Guidance:
Sexual violence and sexual harassment between children in schools and colleges
Gweres Kernow: www.cornwall.gov.uk/gweres-kernow
Sharing nudes and semi-nudes: advice for education settings

Making or Sharing of Nudes and Semi-Nudes (Updated to include AI)

Definition

The making or sharing of nudes and semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video.

The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Staff Responsibilities

If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must NOT:

- View, copy, print, share, store or save the imagery yourself
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) involved to disclose information regarding the imagery
- Share information about the incident with other members of staff, pupils, or parents/carers
- Say or do anything to blame or shame any young people involved

Initial Review

The DSL will hold an initial review meeting to consider:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to police and/or children's social care
- Whether the image(s) involves AI-generated content
- If it is necessary to view the image(s) to safeguard the young person
- What further information is required
- Whether to contact parents/carers

AI-Generated Images

Where images are AI-generated (deepfakes or deep nudes), the DSL will consider:

- Who created the images and how
- Whether the creation involved real images of the child
- The intent behind creating the images
- How widely the images have been shared
- The impact on the victim
- AI-generated nude or semi-nude images of children are illegal and will be treated with the same seriousness as real images.

Guidance:
Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS)
Guidance for responding to incidents of sharing nudes and semi-nudes (DSIT)

CHILD PROTECTION AND SAFEGUARDING POLICY

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