



# TRINITY SCHOOL

## Safeguarding and Child Protection Policy and Procedures (2025-26)

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## **1. ROLE OF THE WHITGIFT FOUNDATION AS PROPRIETOR**

As proprietor and governing body, The Whitgift Foundation fully undertakes and recognises its statutory and regulatory duties relating to each of the two Foundation schools: Trinity School of John Whitgift, and Whitgift School. The Foundation has extensive statutory and regulatory duties beyond those relating to its two schools in the form of care homes and other significant commercial interests.

Therefore, to support the Court of Governors of the Whitgift Foundation (the ‘Court’) in fulfilling the Foundation’s statutory and regulatory responsibilities, each of the two Foundation schools has its own School Governing Committee, of which at least four members are Court Governors, including the Chairman. The Head of each school reports directly to the Chairman of the School Committee and it is the School Committee that has direct oversight of the School and its performance.

Each of the two school committees, supported by sub-committees, are charged (without the Foundation delegating its responsibilities) to review in detail and monitor all statutory and regulatory requirements and report back to the Court, which meets four times a year, via the Chairman of the School Committee and the submission of School Committee minutes, so that the Court can consider and oversee any matters arising and deal with them as appropriate.

A Court Governor will be appointed to take lead responsibility for safeguarding arrangements on behalf of The Whitgift Foundation and this appointment will be reviewed annually by the Court.

## 2. INTRODUCTION

Trinity School (hereafter referred to as the 'School'), the Trinity School Committee and the Whitgift Foundation fully recognise their moral and statutory responsibility to safeguard and promote the welfare of all children. The School and its Governors (that is, members of the School Committee comprising the School's governing body) are wholly committed to providing a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and have in place procedures to ensure that children receive effective support, protection and justice as required. In all its dealings, the Whitgift Foundation, the Trinity School Committee and staff of the School are committed to considering at all times what is in the best interest of the pupils of the School.

The Senior Leadership of the School recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and will provide opportunities for staff to contribute to, and shape, safeguarding arrangements and child protection policy.

**While this policy seeks to explain and accurately articulate the School's approach to safeguarding, it is essential that anyone who teaches, coaches or supervises Trinity School pupils understands that they are able to make a direct referral to external safeguarding authorities at any time should they feel concerned about the welfare of a pupil. See section 5.1 and Appendix B for procedures.**

Safeguarding and Promoting the Welfare of Children is:

- 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 and development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

The School's Safeguarding and Child Protection Policy will be reviewed annually by the Trinity School Committee, unless an incident or new legislation or guidance suggests the need for an earlier date of review. The reviewed policy will be presented to the Court of the Foundation for approval.

The School will maintain written records of concerns, discussions and decisions made, and the reasons for those decisions, about children (noting the date, event and action taken), even when there is no need to refer the matter to children's services, the police or other agencies.

This policy is based on the Department for Education's (DfE's) statutory guidance:

- Keeping Children Safe in Education (2025)
- Working Together to Safeguard Children (2023)

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, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination

### **3. THE PRINCIPLES AND AIM OF THIS POLICY:**

#### **3.1 PRINCIPLES**

The School and its Governors are committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this

commitment so as to create an open environment where staff and pupils feel able to raise concerns, and where concerns will be listened to with a readiness to involve support services and other agencies as necessary:

- The school will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities;
- All children, regardless of age, sex, gender identity, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties;
- All members of staff are responsible for safeguarding the welfare of children as part of their professional duties;
- All staff have an equal responsibility to act, in accordance with this policy and Keeping Children Safe in Education (Part 1 or Annex A), on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of significant harm;

A child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible.

The School is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the School's Safer Recruitment policy.

All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the school who will follow this policy guidance and statutory guidance in doing so.

The School will work with other agencies wherever such work is needed to ensure adequate arrangements to identify, assess and support those children who are suffering significant harm or who may suffer significant harm without appropriate intervention. The School will work with the Croydon Safeguarding Children Partnership, the police, health and other services to promote the welfare of children and to protect them from harm.

Where requested to do so, the School will allow access for children's social care from the Local Authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. In addition, the School will comply with any request to supply information to the Local Safeguarding Children's Partnership that it requires in order for it to perform its functions.

The School recognises the need to differentiate between safeguarding children who have suffered or who are likely to suffer harm and those in need of additional support from one or more agencies. The former is recognised as needing to be referred to social services **immediately** and the latter should lead to inter-agency

assessment using local processes, including use of the 'Common Assessment Framework' (CAF) and 'Team Around the Child' approaches.

If a crime has been committed, the School will ensure that the police are contacted immediately. This contact will be made prior to any discussion of the incident with parents and pupils.

**While decisions to seek support for a child in need would normally be taken in consultation with parents and pupils, their consent is not required to make a referral if there are reasonable grounds to believe that a child is at risk of significant harm.**

### **3.2 Aims:**

As stated in the introduction, the School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. As such, the School aims:

- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- To raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children, known or thought to be at risk of harm.
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To ensure that key concepts of Safeguarding are integrated within the curriculum via Personal Development (PSHE) and Sixth Form Diploma lessons.
- To develop effective working relationships with all other agencies, involved in safeguarding children.
- To ensure that all adults within our school who have access to children have been checked as to their suitability.

## **4. KEY PERSONNEL**

The School has both a Designated Safeguarding Lead and six Deputy Designated Safeguarding Leads.

Designated Safeguarding Lead (DSL): Sam Cater

*Role in school: Assistant Head Safeguarding* 0208 656 9541  
07540 691 099  
[safeguarding@trinity.croydon.sch.uk](mailto:safeguarding@trinity.croydon.sch.uk)  
[sic@trinity.croydon.sch.uk](mailto:sic@trinity.croydon.sch.uk)

Deputy Designated Safeguarding Leads (DDSL):

Inga Sinclair  
02086569541  
[ims@trinity.croydon.sch.uk](mailto:ims@trinity.croydon.sch.uk)

Jed Pietersen  
0208 656 9541  
[jep@trinity.croydon.sch.uk](mailto:jep@trinity.croydon.sch.uk)

Jack Munnery  
0208 656 9541  
[jzm@trinity.croydon.sch.uk](mailto:jzm@trinity.croydon.sch.uk)

Rosabelle Lattery-Lee  
0208 656 9541  
[rll@trinity.croydon.sch.uk](mailto:rll@trinity.croydon.sch.uk)

Hannah Carey  
0208 656 9541  
[hcc@trinity.croydon.sch.uk](mailto:hcc@trinity.croydon.sch.uk)

Victoria Boorman  
0208 656 9541  
[vjb@trinity.croydon.sch.uk](mailto:vjb@trinity.croydon.sch.uk)

References in this policy to the Designated Safeguarding Lead should be assumed to apply equally to the Deputy Designated Safeguarding Leads.

Headmaster:

Alasdair Kennedy  
0208 656 9541  
[hmsec@trinity.croydon.sch.uk](mailto:hmsec@trinity.croydon.sch.uk)

Chair of Trinity School Committee:  
(Member of the Whitgift Court of Governors)

David Seymour  
[seymourdavid1@yahoo.co.uk](mailto:seymourdavid1@yahoo.co.uk)

Chair of the Whitgift Foundation:

Fiona Fletcher-Smith  
0208 680 8499

Child Protection Governor for the School:

Paul Minton  
[pminton@trinity.croydon.sch.uk](mailto:pminton@trinity.croydon.sch.uk)

\*Local Authority Designated Officer (LADO):

LADO: Jane Rowe

Business Support Officer:  
Karen Anns  
Direct line: 020 726 6000 ext  
24817  
[lado@croydon.gov.uk](mailto:lado@croydon.gov.uk)

*\*The LADO coordinates the safeguarding and investigative process in response to allegations made against people working with children.*

## **5. CHILD PROTECTION PROCEDURES:**

The School's procedures for safeguarding children are in line with the Croydon LA and 'Croydon Safeguarding Children Partnership' child protection procedures. This means we will ensure that:

- We have a designated senior member of staff (Designated Safeguarding Lead) for child protection, who is a member of the School's Senior Leadership Team, who has undertaken appropriate training including local safeguarding thresholds and referral processes, online safety and the Prevent Duty.
- We have other members of staff who will act in the Designated Safeguarding Lead's absence (Deputy Designated Safeguarding Leads), who have also received training to the same level as the Safeguarding Lead.
- The DSL and DDSLs will receive appropriate training, as recommended by the Croydon Safeguarding Children Partnership.
- All members of staff will receive appropriate training:
  - to develop their understanding of the signs and indicators of abuse
  - to understand how to respond to a pupil who discloses abuse
  - about the procedure to be followed in sharing a concern of possible abuse or a disclosure of abuse
- Parents/carers are made aware of the school's responsibilities in regard to child protection procedures through publication of this policy on the School website.
- All staff new to our school will be made aware of the School's policy and procedures, the name and contact details of the Designated Safeguarding Lead/Deputy Designated Safeguarding Leads as part of their induction into the school.
- All Trinity staff will provide written confirmation that they have read and understood the Part 1 (or Annex A for those who do not work directly with children) of Keeping Children Safe in Education (2025), the School's Safeguarding and Child Protection Policy, Behaviour and Sanctions Policy, Staff Code of Conduct, Missing Pupil and Whistleblowing Policies.

- We will always communicate readily with the Croydon Safeguarding Children Partnership (and other safeguarding authorities where appropriate) whenever an allegation or disclosure is made.
- Our safeguarding procedures will be reviewed and updated annually.

## 5.1 WHAT TO DO IF YOU ARE CONCERNED ABOUT A CHILD:

All staff should be aware of indicators of abuse or neglect so that they are able to identify cases of children who may be in need of help or protection. Indicators of abuse or neglect are described in Appendix A of this policy.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Where staff see in children signs which cause them concern, they should speak to the DSL or Deputy. It is not the role of staff to carry out an investigation. The member of staff should then make a written report using CPOMS noting the concern, recording the date, and any action taken. The Designated Safeguarding Lead will take action and keep records of the concern and action taken.

All child protection records will be filed securely and separately from the main pupil files. They include a comprehensive outline of the concern, details of how it was followed up, notes of actions and decisions, and the outcome. At Trinity these records are kept online using the platform CPOMS.

If a member of staff is concerned that a pupil may be suffering significant harm or is at risk of significant harm, the matter should be referred to the DSL, or deputy in the DSL's absence, as soon as possible.

If there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care **immediately**, or in an emergency, dial 999 and request the appropriate emergency service. Anyone can make such a referral and the police must be contacted if there is reason to believe that a crime has been committed.

See Appendix B for a flow chart illustrating actions to be taken when there are concerns about a child.

### 5.1.1 How to make a referral to Croydon Children's Services

**In Croydon, child protection and other safeguarding referrals should be made to the 'Multi-Agency Safeguarding Hub' (MASH) which allows access to support from Children's Social Care, Early Help and includes CAMHS liaison for Emotional Wellbeing /Mental Health referrals.**

All information about referrals, including the portal for making a referral can be found here:

<https://www.croydon.gov.uk/children-young-people-and-families/child-protection-and-safeguarding/report-concern-about-child>

- If the concern is urgent, consider contacting emergency services on 999. If it is not appropriate to call 999, but a same day response is needed:
- During office hours, Monday to Friday, 9pm to 5pm: call the Multi-Agency Safeguarding Hub (MASH) on 0208 255 2888. The referral, if appropriate, will be accepted over the telephone and you will need to follow this up by completing the online referral form within 24 hours.
- Out Of Hours: call the Emergency Duty Team (EDT) on 0208 726 6400. The call operator will take your details and pass the message on to the EDT social worker to respond. This may not be immediate, depending on their workload.
- *Many Trinity pupils live in boroughs other than Croydon. Referrals must be made to the Safeguarding Children's Partnership in the borough where they are resident. The Designated Safeguarding Lead can advise further if required. Contact details for the relevant referral pathway can be found by searching 'safeguarding children' and the name of the local authority (eg 'safeguarding children Bromley')*
- Reports of concerns under the Prevent duty should be made to [channel@croydon.gov.uk](mailto:channel@croydon.gov.uk). Further details about the Prevent duty and referrals can be found in section 22 of this policy.

Other information:

Referrals should be in writing using a MASH safeguarding referral form completed either by the designated safeguarding lead or deputy, or by the teacher raising concerns. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the MASH safeguarding referral form within 48 hours.

Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case with a social worker by calling the MASH referral line.

## **5.2 WHAT TO DO IF A CHILD DISCLOSES INFORMATION TO YOU:**

It takes a lot of courage for a child to disclose that they are being neglected and / or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that **you must** pass the information on – you are not allowed to keep secrets or promise confidentiality. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen; if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

If a child volunteers information about abuse to a member of staff, it may sometimes be done obliquely rather than directly. An abused child is likely to be under severe emotional stress and the staff member may be the only adult whom the child is prepared to trust. When information is offered in confidence, the member of staff will need to explain with sensitivity, whilst retaining the child's trust, that action may be required, that other adults will need to be informed and that complete confidentiality cannot be honoured. Staff need to be aware that the most important aspect of their response to a child is willingness to listen and to take seriously what the child is saying, without asking questions or making any assumptions (e.g. about who has abused the child) which could later be interpreted as leading the child if criminal proceedings were to follow. The child should tell the full story of what has happened only once. The member of staff should make a written note of the discussion as soon as possible, recording date, place and names of any else present, and using the words of the child where they are remembered. In any criminal proceedings these notes would be potentially disclosable to both the prosecution and defence lawyers.

During your conversation with the child:

- Allow them to speak freely.
- Remain calm and do not over-react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Do not be afraid of silences – remember how hard this must be for the child.
- Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, or what the child's mother thinks about all this.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the child may interpret it that they have done something wrong.
- Tell the child what will happen next.

- The child may agree to go with you to see the DSL. If they do not, contact the DSL or deputy and ask them to come to you.

After your conversation with the child:

- If you have been unable to contact the DSL or Deputy, refer directly to the police or children's social care yourself (see section 5.1.1. above). You do not need the consent of the child or parent to do this.
- Seek support if you feel distressed.
- Consider whether the action required of you constitutes 'Whistleblowing' (see Whistleblowing Policy for further information)

If the disclosure involves child-on-child abuse, in particular that involving sexual violence, please see sections 6.3 and 8.2.2 for further information.

### **5.3 CONFIDENTIALITY**

- The School recognises that all matters relating to child protection are confidential.
- The Designated Safeguarding Lead will disclose personal information about a pupil to other members of staff on a need-to-know basis only.
- All staff are aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.
- School staff will always undertake to share our intention to refer a child to social services with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation.
- Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.
- Further information on sharing information can be found via this link: <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>. This advice includes the seven golden rules for sharing information.
- See also Section 23 on Data Protection which gives further guidance about sharing or withholding personal information in relation to safeguarding concerns.

### **5.4 EARLY HELP**

Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can prevent further problems arising and/or escalating in the future.

Staff at the School are aware of the importance of being alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education health and care plan);
- has a mental health need;
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing / goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative provision or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Staff are aware of the benefits of early help to a pupil who may be experiencing difficulty, and understand their role in identifying emerging problems, liaising with members of the pastoral team and sharing concerns with the Designated Safeguarding Lead.

Referrals to Early Help should be made via Croydon MASH, or the equivalent services for the local authority where the student is resident. See Section 5.1.1 for details of how to refer.

## **6. SAFEGUARDING ISSUES: WHAT STAFF SHOULD LOOK OUT FOR**

### **6.1 SAFEGUARDING ISSUES AND CONTEXTUAL SAFEGUARDING**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families and outside the home. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

### **6.2 ABUSE AND NEGLECT**

Detailed information on specific forms of abuse and indicators of abuse is outlined in Annex A of Keeping Children Safe in Education 2025 which all members of staff (including supply staff and volunteers) must read. This content is outlined below.

Further information about indicators of abuse and neglect can be found in appendix A of this policy.

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

**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 a high level of 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 (see section 8.2 of this policy and the more detailed information in our policy 'Allegations of Sexual Violence and Sexual Harassment between Pupils').

**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, as a result of

maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate 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.

### **6.3 CHILD ON CHILD ABUSE**

All staff should be aware that children can abuse other children (previously referred to as peer-on-peer abuse) and that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to the designated safeguarding lead (or deputy)

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an 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 to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery – see further information in section 6.6 of this policy);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

While it is more likely that girls will be victims and boys perpetrators, all child-on-child abuse is unacceptable and will be taken seriously.

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

See Section 8.2 for information on how to respond to allegations of child-on-child abuse.

#### **6.4 SERIOUS VIOLENCE**

All staff should be aware of indicators that may signal that children are at risk from or involved in serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

#### **6.5 DOMESTIC ABUSE**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The Domestic Abuse Act (2021) recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. Domestic abuse is defined as abusive behaviour (physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour; economic abuse; psychological, emotional or other abuse), whether a single incident or a course of conduct, between two people who are personally connected and both over the age of 16. 'Personally connected' includes relatives and those who are or have been intimate partners, in civil partnerships and in marriages.

Trinity School is signed up to Operation Encompass; a system to allow police to inform the school, before the start of the next school day, that police have been called to a domestic incident, allowing the School to put appropriate support in place. Operation Encompass provides a helpline services for staff concerned about children who have experienced domestic abuse. This is available 08:00 to 13:00, Monday to Friday on 0204 513 9990.

## **6.6 FEMALE GENITAL MUTILATION AND OTHER FORMS OF SO-CALLED 'HONOUR'-BASED VIOLENCE / ABUSE**

*All staff should speak to the DSL or Deputy with regard to concerns about FGM. For teachers, there is a specific duty to report this concern to the police.*

So-called 'Honour'-based abuse (HBA) encompasses crimes which have been committed to protect or defend the 'honour' of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM – see Section 2.5 of the document hyperlinked below for the nationalities that traditionally practise FGM. Provided that the mutilation takes place in the UK, the nationality or residence status of the victim is irrelevant.

Further detailed guidance can be found here:

[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf)

### **Mandatory Reporting:**

All staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, becomes aware of, or has reason to suspect that, female genital mutilation has been carried out on a girl under the age of 18, they must report their concern immediately to the police and, thereafter and unless there is a good reason not to do so, to the Designated Safeguarding Lead. If the DSL is unavailable, or if the person reporting their suspicion feels unable to approach the DSL, the report will be made to a Deputy Designated Safeguarding Lead and, if none of them is available, the most senior member of staff will be alerted.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and teachers should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

## **6.7 SHARING NUDES AND SEMI-NUDES (SEXTING / YOUTH PRODUCED SEXUAL IMAGERY)**

The latest advice for schools and colleges is available via this link: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

This advice uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or youth involved sexual imagery
- Indecent imagery: This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'sexting': Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse: This term may be used when referring to the non-consensual sharing of nudes and semi-nudes

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared.

This does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

#### 6.7.1 Dealing with an incident involving nudes or semi-nudes

When an incident involving nudes or semi-nudes comes to the attention of a member of staff the school will follow the procedures laid out in 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (link above). A summary of key advice is included below:

- The incident should be referred to the DSL as soon as possible.
- The DSL will hold an initial review meeting with appropriate school staff to establish whether there is an immediate risk to the young person or young people, whether a referral should be made to the police and / or children's social care. Appendix A in the 'sharing nudes' advice will be used to help make this decision.
- An immediate referral to police and / or children's social care will be made if:
  1. The incident involves an adult
  2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent
  3. What is known about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
  4. The imagery involves sexual acts and any pupil in the images or videos is under 13

5. There is reason to believe a child is at immediate risk of harm owing to the sharing of the images or videos (eg the pupil is suicidal or self-harming)

The decision to respond to the incident without involving police or children's social care will only be made when the DSL (or Deputy DSL, in the DSL's absence) is confident they have enough information to assess the risks to any child involved and that those risks can be managed within the school's pastoral support and disciplinary framework. The decision will be made with input from the Headteacher, and other members of SMT or staff if appropriate.

- If police / children's social care are not involved, there will be subsequent interviews with the young people involved (if appropriate), and the DSL / DDSL will complete a risk assessment in relation to the incident.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm or that informing them could interfere with a criminal investigation.
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.
- Decisions will be based on consideration of the best interests of the young people involved, and take into account proportionality as well as the welfare and protection of young people. The decisions and reasons for them will be recorded, and reviewed throughout the process.

## **6.8 CHILD SEXUAL EXPLOITATION AND CHILD CRIMINAL EXPLOITATION**

Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

### **6.8.1 Child Criminal Exploitation**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### 6.8.2 Child Sexual Exploitation

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

Exploitation, as well as being physical, can be facilitated and / or take place online. It may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex.

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

More information and definitions are included in Part 1 and Annex B of Keeping Children Safe in Education 2025.

## **6.9 MENTAL HEALTH**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

If staff have a mental health concern about a child, they should inform the relevant Head of Year. If there is a mental health concern that is also a safeguarding concern, they should immediately speak to the designated safeguarding lead or a deputy.

## **6.9 OTHER SAFEGUARDING CONCERNS**

Information about the safeguarding concerns listed below can be found in Annex B of KCSIE (2025):

Child abduction and community safety incidents; Children and the court system; Children missing from education; Children with family members in prison; County lines; Modern slavery and the National Referral Mechanism; Cybercrime; Domestic abuse; Homelessness; Preventing radicalisation, the Prevent Duty and Channel (see also section 22 of this policy).

In addition, Annex B contains information on:

Child sexual exploitation and child criminal exploitation; so-called 'Honour'-based abuse (including FGM and forced marriage); child-on-child abuse; Sexual violence and sexual harassment between children in schools and colleges; Upskirting; the response to a report of sexual violence or sexual harassment

## **7. CHILDREN POTENTIALLY AT GREATER RISK OF HARM**

### **7.1 CHILDREN WITH A SOCIAL WORKER (CHILD IN NEED AND CHILD PROTECTION PLANS)**

When a child is allocated a social worker, the Local Authority should inform the school about this. The Safeguarding Lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

This will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **7.2 CHILDREN REQUIRING MENTAL HEALTH SUPPORT**

The School has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems, as outlined in the School's *Mental Health Policy*.

### **7.3 LOOKED AFTER CHILDREN**

The School is aware of its moral and statutory obligation to support Looked After Children, and that previously looked after children potentially remain vulnerable. As for all our pupils, the School is committed to helping every Looked After Child (LAC) to achieve the highest standards they can, including supporting aspirations to achieve in further and higher education. The Designated Safeguarding Lead has specific responsibility for overseeing the welfare and progress of any Looked After Child attending Trinity School. Prompt action and effective liaison with other agencies is essential to safeguard these children, who are a particularly vulnerable group.

*(See 'Policy for the Education of Looked After Children' for further details)*

### **7.4 CHILDREN WITH AN SEND DIAGNOSIS**

The school recognises that our students who have special educational needs or disabilities may be more vulnerable to various risks, such as bullying, online

grooming or criminal exploitation. Staff will be mindful of this increased vulnerability, including:

- the assumption that indicators of possible abuse (such as behaviour, mood and injury) relate to the child's condition without further exploration
- that these children are more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

If there is a safeguarding concern about a student with a SEND diagnosis, the Safeguarding Team will read the student's IEP and act in line with the recommendations it makes. A referral to outside agencies will always include information about a child's SEND status.

## **7.5 CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL OR GENDER QUESTIONING**

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, the school will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Further guidance can be found here: [Guidance for Schools and Colleges: Gender Questioning Children \(education.gov.uk\)](https://www.gov.uk/guidance/guidance-for-schools-and-colleges-gender-questioning-children)

Risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and the School will robustly counter homophobic, biphobic and transphobic bullying and abuse, using the sanctions system set out in the Behaviour and Sanctions Policy.

## **8. RESPONSE TO ALLEGATIONS**

### **8.1 ALLEGATIONS AGAINST STAFF INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS WORKING AT THE SCHOOL:**

If a child or his/her parent discloses to a member of staff information about abuse by another member of staff (including supply staff and volunteers), the person receiving the information should immediately pass it to the Headmaster. If the allegation made to a member of staff concerns the Headmaster, the person receiving the allegation should immediately contact the Chair of Governors, without informing the Headmaster. The Chair will then consult the LADO without notifying the Headmaster first.

For guidance on allegations against individuals working or volunteering for an organisation that is using the school premises, see section 16 below.

#### **8.1.1 Allegations that may meet the harms threshold**

This guidance applies to the management of cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college, specifically allegations that indicate a person has:

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

The last bullet point above includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children; this is known as transferable risk (eg involvement in domestic abuse, even if the incident did not involve a child). Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. Advice will be sought from the LADO to clarify whether a situation meets the criteria for transferable risk if unclear.

The Headmaster on all such occasions will immediately (or, at the latest, within 24 hours of the allegation being made), discuss the content of the allegation with the

DSL (or Deputy DSL if the DSL is the subject of the allegation) and the LADO. If the Headmaster/ senior teacher believes that a crime has been committed, the police will be contacted immediately. Other than carrying out basic checks such as establishing whether the individual was present at the location named at the time of the allegation, whether they could have come in contact with the child, and whether there are witnesses or CCTV, no investigation will be undertaken by any member of the School without prior consultation with the LADO or police. This is to ensure that statutory investigations are not jeopardised. In borderline cases, informal discussions will be held with the LADO, with neither the name of the School nor the individual concerned being mentioned. If any investigations are to be carried out subsequent to that discussion, they will be conducted on the basis of the advice received by the LADO/ police.

Where an adult makes an allegation to the School that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child, will be reported to the LADO in line with the local authority's procedures. The LADO will coordinate with children's social care and the police.

When dealing with an allegation the School response will consider two aspects:

- Looking after the welfare of the child - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- Investigating and supporting the person subject to the allegation - the Headmaster should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

Teachers are particularly vulnerable to accusations of abuse but even though such allegations may be false, malicious or misplaced, reporting in line with the pathways laid out above must be immediate and the informant assured of that. The member of staff against whom the allegation has been made will not be informed of the allegation until after the LADO has been consulted.

All aspects of the response to an allegation against a member of staff (including supply staff and volunteers), including reporting, investigating, decision-making, confidentiality, record-keeping and support for those involved will be undertaken in line with the guidance published in Keeping Children Safe in Education 2025 and with reference to the harms test (see below).

Colleagues should take steps to minimise the impact of an unfounded allegation through following this advice:

- All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- All staff should be aware of the School's Behaviour and Sanctions Policy and the Staff Code of Conduct.

The Headmaster will report to the Disclosure and Barring Service (DBS) any person whose services are no longer used because he or she is considered unsuitable to work with children as soon as possible. The Headmaster shall also report, within one month, any cases of teachers leaving the school because he or she is

considered unsuitable to work with children to the Teacher Regulation Agency. Where a teacher's employer dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State via the Teaching Regulation Agency.

The duty to refer to the DBS relates to anyone who has harmed or poses a risk of harm to a child or vulnerable adult where:

- The harm test is satisfied in respect of that individual. Guidance is available here: <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>
- The individual has received a caution or conviction for a relevant offence, or there is a reason to believe that the individual has committed a listed relevant offence
- The individual has been removed from working (paid or unpaid) in a regulated activity, or would have been removed had they not left.

(See 'Whistleblowing policy' for further information about raising concerns relating to school staff).

It is a legal duty to take action when there is a safeguarding concern or allegation about a member of staff who may pose a risk of harm to children and failure to refer when the criteria are met is a criminal offence.

#### 8.1.2 Concerns that do not meet the harms threshold – low level concerns

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold in section 8.1.1 above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

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

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

All low-level concerns will be recorded in writing. The record will be stored confidentially and securely and will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will take action, either through its disciplinary procedures or through a referral to the LADO where a pattern of behaviour moves from a concern to meeting the harms threshold.

As per guidance set out in Keeping Children Safe in Education 2025, records will be retained at least until the individual leaves the School's employment.

All aspects of the response to a low level concern will be undertaken in line with the guidance published in Keeping Children Safe in Education 2025.

Further details of the School's recording, management and response to low level concerns can be found in the Low Level Concerns Policy.

## **8.2 ALLEGATIONS MADE AGAINST FELLOW PUPILS (CHILD-ON-CHILD ABUSE):**

Child-on-child abuse is defined and explained in section 6.3 of this policy.

Any allegations of abuse made by one or more pupils against another pupil must be reported to the Designated Safeguarding Lead (DSL), who will take necessary measures to safeguard the pupil and will refer the matter immediately to the Headmaster or most senior teacher present.

It is the School's assumption that, in the event of serious allegations being made of child on child abuse, all children involved (whether perpetrator or victim) are at risk and the Designated Safeguarding Lead will refer the matter to Children's Social Care in the borough(s) where the pupil(s) are resident immediately or, at the latest, within 24 hours.

Procedures for recording, investigating and dealing with child on child abuse can be found below. For incidents of bullying, including cyber bullying, procedures are outlined in further detail in the Antbullying policy.

### **8.2.1 Procedures to minimise the risk of child-on-child abuse**

Creating an appropriate culture within the School:

- The School uses a variety of methods (e.g. Personal Development (PSHE) and Diploma lessons, tutorials, whole-school and year-group assemblies, external providers) to foster a culture in which all members of its community treat one another with courtesy, kindness and respect.
- All staff receive safeguarding training and are required to confirm that they have read, understand and are able to implement the School's Safeguarding and Child Protection Policy.
- All staff are also required to confirm that they have read and understood Part One (or Annex A for those who do not work directly with children) of the most recent version of Keeping Children Safe in Education

Examples of practical steps taken to minimise the risk of child-on-child abuse:

- Pupils are encouraged to share any concerns they have about their safety and wellbeing with friends, their tutor, a trusted member of staff or the

Designated/ Deputy Designated Safeguarding Lead. Posters emphasising this are located in all form rooms and there is clear advice on students' Ludus pages about what to do if they have a concern, which can be accessed directly or via a 'report a concern' button on the dashboard. This information is (re)advertised to all students by tutors every term.

- Students are educated about abusive behaviours including sexual harassment, consent, sexual assault, rape, sharing indecent images of under 18s (with or without consent), bullying, discrimination, to help them recognise and report these behaviours.
- Classrooms have windows in doors to ensure that anyone passing a room can see into it
- Any and all forms of bullying are dealt with swiftly and firmly by staff and pupils are encouraged to share information about bullying with a member of staff.
- No form of initiation is tolerated
- Students are supervised by prefects and members of staff during the day
- Unless involved in formal after-school activities, pupils are not allowed to stay on the school site once the school day has ended.
- Staff recognise the vulnerability of pupils with SEND

(See Anti-bullying Policy, Supervision of Pupils: Guidance for Staff, and the Behaviour and Sanctions policy for further information).

### 8.2.2 Responding to a report of child-on-child abuse

This section outlines how allegations of child-on-child abuse will be recorded, investigated and dealt with:

#### 8.2.2.1 Responding to Bullying and Physical Abuse, including initiation rituals / violence

- When a member of staff becomes aware of an incident that involves bullying (including cyberbullying, prejudice-based and discriminatory bullying), physical abuse (which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), or hazing / initiation rituals or violence that does not involve a sexual component, they should report this to the relevant Head of Year(s) as soon as possible and record on CPOMS.
- This applies equally to incidents on the school site and those that happen offsite (eg at school fixtures or on school trips) and out of school hours (eg on public transport, online behaviour).
- The Head of Year will liaise with the Head of Sixth Form (Sixth Form concerns) or Assistant Head Pastoral (J-5<sup>th</sup> Year concerns), both of whom are Deputy Safeguarding Leads, who will make a judgement about whether a safeguarding or pastoral response is appropriate.
- The investigation will be led by the Head of Year, supported by the Head of Section.
- A record of the incident, victim, alleged perpetrator, witnesses, action taken and three-week follow up will be made in the Bullying Log by the Head of Year.

- When bullying or physical abuse is found, on the balance of probability, to have taken place, the perpetrator is likely to receive a serious sanction, as per the Behaviour and Sanctions policy.
- If there is a racist aspect to the incident, a Racist Incident Reporting Form will be completed and the incident will be dealt with according to the 'Responding to a Racist Incident' policy
- If there is a safeguarding concern the Head of Sixth Form (Sixth Form concerns) or Assistant Head Pastoral (J-5<sup>th</sup> Year concerns) will meet with the Designated Safeguarding Lead and a log will be made on CPOMS, alongside taking actions to safeguard the students involved.
- If there is a possibility that a criminal offence has been committed, the Head of Sixth Form (Sixth Form concerns) or Assistant Head Pastoral (J-5<sup>th</sup> Year concerns) will liaise with the Designated Safeguarding Lead and the police will be contacted.

Further details can be found in the [Anti-bullying Policy](#) and the [Responding to a Racist Incident Policy](#).

#### 8.2.2.2 Responding to all other forms of child-on-child abuse including sexual violence and sexual harassment

This section outlines the response to: relationship abuse; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images; non-consensual sexual activity; upskirting; initiation and hazing violence or rituals that include a sexual component.

The behaviours listed all fall under safeguarding, so a member of staff who becomes aware of an incident in any of these categories must inform the Designated Safeguarding Lead (or, in the absence of the DSL, a Deputy DSL) as soon as practically possible. This includes any incidents of child-on-child sexual violence and sexual harassment that have happened outside of the school premises and/or online.

The School takes a zero tolerance approach to sexual violence and sexual harassment. Staff and Governors will not tolerate any form of abuse at the School and will not pass it off as 'banter', 'just having a laugh' or 'part of growing up'. The School recognises the gendered nature of child-on-child abuse (ie that it is more likely that girls will be victims and boys perpetrators) but that all child-on-child abuse is unacceptable and will be taken seriously. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. School staff will always challenge physical behaviour, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts, since dismissing or tolerating such behaviours risks normalising them.

The School acknowledges and understands the scale of harassment and abuse, and recognises that even if there are no reports, it does not mean it is not happening but rather it may be the case that it is just not being reported.

Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

The School provides information and advice to pupils about sexual violence and harassment through the Personal Development and Diploma curricula (PSHE lessons) and there is information and a reporting button on the LUDUS 'Safeguarding, Safety and Welfare' pages, which are advertised to students by their tutors at least termly.

#### 8.2.2.2.1 Sexual Violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that **it can happen both inside and outside of school/college.**

'Sexual violence' refers to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE - sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

#### 8.2.2.2.2 Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. The School will consider when any of this crosses a line into sexual violence which will include talking to and considering the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provides detailed advice for schools and colleges.
  - sharing of unwanted explicit content
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media
  - sexual exploitation; coercion and threats, and
  - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

The School recognises that sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

#### 8.2.2.2.3 Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

When considering HSB, the School will consider both ages and the stages of development of the children as these are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed in Annex B of KCSIE 2025.

HSB can, in some cases, progress on a continuum and addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

**All members of staff must know how to respond to a disclosure or report of these behaviours, as summarised below:**

It is essential that all victims are reassured they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that has occurred online or outside of school should be taken equally seriously. The initial response to the report is incredibly important as this can encourage or undermine the confidence of future victims to report or come forward.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or have their experience minimised. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

- If at all possible, speak to the student(s) with two members of staff present; one of them should be the Designated Safeguarding Lead or Deputy.
- Do not view or forward any illegal images of a child; instead confiscate relevant devices as soon as possible, to preserve evidence to hand to police. Further information can be found in [‘Searching, Screening and Confiscation in Schools’](#) and from [‘Sharing nudes and semi-nudes: advice for education settings’](#), including advice about what to do when viewing and image is unavoidable.
- Do not promise confidentiality as it is very likely the concern will have to be shared further, for example with children’s social care and/or the police. Tell the victim who you will tell (eg DSL) and why; only share with those people necessary to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.

- Listen carefully and non-judgementally. Use the child's own language and reflect back to them what you have understood. Be supportive and respectful; the disclosure has placed you in a position of trust.
- Recognise that the initial disclosure may only be the first incident reported rather than assuming this is a singular incident.
- Recognise that trauma can impact memory so the child may not be able to recall all details or a complete timeline of abuse.
- Be aware that some children may face additional barriers to telling because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- Avoid leading questions and only prompt where necessary using open questions (when, where, what). Note that while leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- Written notes are required – it is essential that a written record is made. Record facts, not your opinions. Remain engaged with child rather than distracted by note-taking (the second member of staff could make the notes, or you could write them immediately after the conversation). Notes of such reports can become part of a statutory assessment by children's social care and/or part of a criminal investigation
- Pass all information and notes to DSL / DDSL as soon as possible if not already involved.

### **Confidentiality**

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. The school will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school or college not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purpose is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice should be sought from the designated safeguarding lead (or a deputy), who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

Additional information on confidentiality and information sharing is available at [Safeguarding Practitioners Information Sharing Advice](#)

### **Anonymity**

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools and colleges should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. Relevant information can be found in: [CPS: Safeguarding Children as Victims and Witnesses](#).

As a matter of effective safeguarding practice, the School will do all it reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

The School will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. Advice for managing the unique challenges regarding social media are discussed in paragraph 473 of KCSIE 2025.

### **Risk Assessment**

In response to an allegation of sexual violence the Designated Safeguarding Lead (or Deputy) will immediately complete a written (electronic) risk and needs assessment for relevant parties, including the victim, alleged perpetrator (pro-forma based on Croydon's model available on HOYS and Safeguarding Teams pages). This process will also consider whether there are other victims as well as any risks to the other children at the School, as well as adult students and staff, where appropriate, especially any actions to protect them from the alleged perpetrator(s) or from future harms. It will also include the time and location of the incident, and any action required to make the location safer. The risk assessment will also consider safety of the victim, alleged perpetrator and other children on school transport, where relevant.

The risk assessment will be kept under review as part of the School's work in actively considering risks posed to all pupil at all times, and putting in adequate measures to protect them and keep them safe.

The School risk assessment will be informed by professional assessments completed by local authority children's social care and any specialise services involved.

As per advice in KCSIE 2025 the need for a risk assessment when there has been a report of sexual harassment will be considered on a case-by-case basis.

### **Action**

In making decisions about the appropriate response, the DSL (and Deputies) will consider the following:

- the wishes of the victim in terms of how they want to proceed; the victim should be given as much control as reasonably possible over decisions regarding how to progress any investigation and any support they are offered. This will be balanced with the School's duty and responsibilities to protect other children.
  - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed;
  - the ages of the children involved;
  - the developmental stages of the children involved;
  - any power imbalance between the children (eg is the alleged perpetrator significantly older, more mature, confident, of higher social standing? Does the victim have a disability or learning difficulty?).
  - if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
  - that sexual violence and sexual harassment can take place within intimate personal relationships between children:
  - the importance of understanding intra familial harms and any necessary support for siblings following incidents;
  - whether there are ongoing risks to the victim, other children, adult students or school or college staff;
- 
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout this guidance. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

### **Options to Manage the Report**

The school will consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that will be carefully considered. Where a report is going to be made to local authority children's social care and/or the police, then, as a general rule, the designated safeguarding lead will speak to the local authority children's social care and the police and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school taking immediate action to safeguard its children, where required.

Subject to these considerations, reports may be managed in one of the following four ways:

### **1. Manage Internally**

In some cases of sexual harassment, for example, one-off incidents, the School may take the view that the children concerned are not in need of early help or that referrals to statutory services are not required, and that it would be appropriate to handle the incident internally, through using the Behaviour and Sanctions policy and by providing pastoral support.

This approach will be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions will be recorded electronically on CPOMS.

### **2. Early Help**

In some cases, the School may decide that the children involved do not require a referral to statutory services, but may benefit from Early Help. This can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

A referral to Early Help will run alongside internal management, as outline above.

This approach will be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions will be recorded electronically on CPOMS.

### **3. Referral to local authority children's social care**

Where a child has been harmed, is at risk of harm, or is in immediate danger, the School will make a referral to local authority social care. At the point of referral, the School will generally inform parents or carers unless there are compelling reasons not to (ie that informing parent / carer will put the child at additional risk). This decision will be made with the support of local authority children's social care.

The School, especially the DSL (or deputy) will work alongside and cooperate with the lead social worker, in order to ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.

The School will not wait for the outcome (or even the start) of a local authority children's social care investigation before protecting the victim and other children in the school. The designated safeguarding lead (or a deputy) will work closely with local authority children's social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment (see above) will help inform any decisions. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report, and all children at the school or college should be immediate.

In cases where the local authority children's social care reviews the case and decides that statutory intervention is not appropriate, the School, led by the DSL or deputy will refer again if it is believed that the child remains in immediate danger, or at risk of harm, or if circumstances change. If statutory assessment is not appropriate, the DSL (or deputy) will consider other support mechanisms, including Early Help, specialist support and pastoral support.

This approach will be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions will be recorded electronically on CPOMS.

#### **4. Reporting to the police**

This will happen whenever a report of sexual assault, sexual assault by penetration or rape is made, as guided by the National Police Chief Council's advice '[When to Call the Police](#)'. Any report to the police will generally be in parallel with local authority children's social care.

Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. The School will also discuss the best way to protect the victim and their anonymity.

At this stage, the School will generally inform parents or carers of the victim unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the child in any decision they take. This will be with the support of local authority children's social care and any appropriate specialist agencies.

If the police, for whatever reason, take no further action, the School will continue to engage with specialist support for the victim and alleged perpetrator, as required.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), the designated safeguarding lead (or deputy) will work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation. The School will direct questions about the investigation to the police.

This approach will be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions will be recorded electronically on CPOMS.

#### **Bail Conditions**

The police may use bail (with or without conditions) or the person suspected could be 'released under investigation (RUI). The school will consider what additional measures are necessary to manage any risk of harm that may arise as a result. In particular regard will be given to the additional stress and trauma that may be caused to the victim, the potential for the suspected person to intimate a victim or witness, the need to ensure that risk management measures strike a balance between management of risks and the rights of an unconvicted person (eg rights to privacy, family life etc). Liaison with police should help to develop a balanced set of arrangements.

The School will not wait for the outcome (or even the start) of a police investigation before protecting the victim and other children in the school. The designated safeguarding lead (or a deputy) will work closely with local authority children's social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment (see above) will help inform any decisions. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report, and all children at the school or college should be immediate.

### **The end of the criminal process**

If a child is convicted of or receives a caution for a sexual offence, the School will update its risk assessment. As per the School's Behaviour and Sanctions policy, the perpetrator(s) will be permanently excluded.

Any conviction is likely to generate interest among other students at the School. The School will work to ensure that both the victim and perpetrators remain protected, especially from any bullying or harassment, including online.

Where cases are classified as "no further action" by the police or Crown Prosecution Service, or where there is a not guilty verdict, the School will continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. The School will discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is/are also likely to require ongoing support for what will have likely been a difficult experience.

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school or college, the school will take disciplinary action against the individual who made it.

## **8.2.3 How victims of child-on-child abuse will be supported**

For students who have not reported a concern / pastoral response to non-safeguarding child-on-child abuse concerns (eg bullying that doesn't meet a safeguarding threshold):

- Information for students about how to report child-on-child abuse, an internal online school reporting system for bullying and discrimination, as well as information about external agencies that can support pupils can be found on the Ludus welfare, safety and wellbeing pages. There is a 'report a concern button' on every students' Ludus dashboard which they can click to take them straight to this information page.
- Members of the School's pastoral team (tutors, Heads of Year and Heads of Section) are always available to meet with pupils to discuss any concerns or difficulties pupils may be experiencing.
- The School's pastoral team share concerns about pupils as required. This ensures that staff are aware of pupils who have experienced, or are experiencing, difficulties and able to support them appropriately.
- The School Nurses, School Counsellor, Mental Health Lead and a Clinical Psychologist are available to see pupils who are experiencing difficulties.

For victims who have reported sexual violence or sexual harassment:

- The needs and wishes of the victim will be paramount, including protecting them. It is important they feel as much in control of the process as possible. Wherever possible, if they wish, they should be able to continue their normal routine. Priority should be given to making their daily experience as normal as possible, so the School is a safe place for them.
- The School will cooperate fully with external agencies (e.g. children's services, the police and CAMHS) in ensuring that any pupil who has suffered sexual violence receives the support they need.
- The school will signpost services that support survivors of sexual violence, including charities like Survivors UK (for boys and men) and Rape Crisis (for girls and women) and NHS services.
- The school will support the victim to access the support of an Independent Sexual Violence Advisor, to support them via liaison with local authority services, if appropriate.
- The victim will have access to regular meetings with a designated trusted adult in school – a person of their choosing from the pastoral, mental health or medical team to encourage open dialogue as well as providing ongoing support. This could facilitate the disclosure of further information about abuse.
- The School will remain alert to the wide range of responses possible from a child who has experienced sexual violence (including signs of trauma or no overt signs at all).
- The age and developmental stage of the victim, the nature of the allegation and the potential risk of further abuse will be considered. The School recognises, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The School will consider the proportionality of the response, and tailor support on a case-by-case basis. Support for a one-off incident of sexualised name calling is likely to be vastly different from that of a report of rape.
- The School will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, but equally recognise that there may be times when the victim finds it difficult to maintain a full-timetable and may express a wish to withdraw from lessons and activities. If required, the

School will provide a physical space (the 'Quiet Room' in the medical room) for the victim to withdraw to. This should be because the victim wants to withdraw and not because it makes it easier to manage the situation.

- The School will do everything it can reasonably do to protect the victim from bullying and harassment as a result of any report they have made.
- The School is aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- While the victim will be given all the necessary support to remain in their school, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers). If the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file, in line with guidance on information sharing found in section 10.

All decisions and actions will be regularly reviewed and relevant policies will be updated to reflect lessons learned. The safeguarding team will be alert to potential patterns of concerning, problematic or inappropriate behaviour, and will decide on an appropriate course of action should a pattern be identified. This will include considering whether there are wider cultural issues within the School that enabled the inappropriate behaviour to occur. If this is the case, extra teaching time and/or staff training will be delivered to minimise risk of it happening again.

#### 8.2.4 How alleged perpetrators of child-on-child abuse will be supported

This section outlines support for alleged perpetrators of sexual harassment and sexual violence. This represents a difficult balancing act, with the need to safeguard the victim and wider student body on one side and the need to provide the alleged perpetrator with an education, safeguarding support as appropriate, and to implement any disciplinary sanctions.

- The school will consider the specifics of the case (eg the age and developmental stage, the nature and frequency of the allegations) when planning and considering the proportionality of the response, taking in to account the likely stress of being the subject of allegations and/or negative reactions of peers to such.
- Actions taken to support the alleged perpetrator will not compromise the safeguarding of the victim.

- The proportionality of response will be considered, and support (and sanctions) considered on a case-by-case basis.
- The School recognises that the alleged perpetrator may have unmet needs, as well as potentially posing a risk of harm to other children; HSB, especially in younger children, may be a symptom of exposure to abusive practices or materials.
- Safeguarding support will be provided alongside any appropriate disciplinary action, up to and including permanent exclusion. Support and sanctions are not mutually exclusive, as noted in KCSIE 2025. The School will be clear about which category (preventative action to safeguarding the victim, safeguarding support for the perpetrator or punishment for past conduct of the perpetrator) any action taken falls into, or whether it is serving more than one of these purposes.
- The school will take advice, as appropriate, from children's social care, specialist sexual violence services, and the police. In addition, other sources of advice will be considered (eg NSPCC, Stop It Now). This is with the aim of giving a perpetrator the correct support to try to prevent reoffending and address any underlying trauma that may be causing this behaviour.
- If an alleged perpetrator moves to another educational institution, for any reason, as well as passing on the safeguarding file, the Designated Safeguarding Lead will make the new institution aware of any ongoing support needs and, if appropriate, potential risks to other children and staff. Information sharing advice (in section 10) will help support this process.

### **Sanctions and the alleged perpetrator(s)**

It is clear that teachers can sanction students whose conduct falls below the standard which could reasonably be expected of them. Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This is a matter for the school and will be carefully considered on a case-by-case basis. The designated safeguarding lead (or a deputy) will take a leading role.

The school will consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or local authority children's social care should help the school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened while an independent investigation is considering the same facts.

As noted above, if a child is convicted of or receives a caution for a sexual offence, he or she will be permanently excluded, as per the School's Behaviour and Sanctions policy.

### **Working with parents and carers**

The school will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and

should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk.

The School will carefully consider what information they provide to the respective parents or carers about the other child involved and when they do so. In some cases, local authority children's social care and/or the police will have a very clear view and it will be important for the school to work with relevant agencies to ensure a consistent approach is taken to information sharing.

Unless there are safeguarding reasons why it is not possible, the School will follow good practice and meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support needed and how the report will be progressed.

Likewise the School will meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions will be explained. Support for the alleged perpetrator will also be discussed. The DSL (or deputy) will attend such meetings, other than in exceptional circumstances, and attendance of other agencies will be considered on a case-by-case basis.

It is acknowledged by the School that parents and carers may well struggle to cope with a report that their child has been the victim of a sexual assault or is alleged to have sexually assaulted another child. Details of organisations that support parents are provided in Annex B of KCSIE 2025, and parents can be signposted to this.

### **Safeguarding Other Children**

The School will consider what support should be given to children (and adult students) who have witnessed sexual violence, especially rape and assault by penetration, as witnessing such an event is likely to be traumatic.

Following any report of sexual violence or sexual harassment, it is likely that some children will 'take sides'. The School will do all it can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed. Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves. Specialist online safety support is discussed in KCSIE 2025 (under 'Support for schools and colleges' (online)).

The School recognises that school transport is a potentially vulnerable place for a victim or alleged perpetrator(s) following any incident or alleged incident. The school, as part of its risk assessment, should consider any additional potential support needs to keep all of their children safe.

The School takes a whole-school approach to safeguarding and makes it clear there is a zero-tolerance approach to sexual violence and sexual harassment, that

it is never acceptable and it will not be tolerated. There is a strong preventative education programme delivered via the Personal Development (PSHE) and Diploma curricula to help create an environment in which all children at the school are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made. The School recognises that reports of sexual violence and/or harassment (especially where there is evidence of patterns of behaviour) may point to environmental and or systemic problems that could and should be addressed by updating relevant policies, processes, or relevant parts of the curriculum. Alongside this, patterns identified in schools may also be reflective of the wider issues within a local area and it would be good practice to share emerging trends with safeguarding partners.

## **9. TRAINING**

The governing body is responsible for ensuring that all staff undergo safeguarding and child protection training (including online safety, which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The training should be regularly updated. Induction and training should be in line with any advice from the safeguarding partners.

Whilst considering training requirements, the governing bodies should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.

- All staff who work directly with children are required to read Part One of KCSIE at the start of every academic year and at any other time that there is a re-issue. Staff who do not work directly with children are required to read either Part One or Annex A. Staff are required to state that they have read and understood this content and the School's Safeguarding and Child Protection Policy. The DSL is responsible for ensuring this happens, and the records are kept centrally.
- All staff, including temporary staff and volunteers, will be provided with induction training that includes:
  - The requirement that they read and understand the School's Safeguarding and Child Protection Policy, and activities to support this (compulsory video and quiz).
  - The requirement that they read and understand the School's Staff Code of Conduct, the Behaviour and Sanctions Policy, and the whistleblowing procedure
  - Information about school procedures to deal with child-on-child abuse
  - Information about the safeguarding response to children who go missing from education.
  - The expectations, roles and responsibilities in relation to filtering and monitoring online content.
  - Identifying and explaining the roles of both the Designated and Deputy Designated Safeguarding Leads
  - Being provided with a copy of
    - This policy

- The Staff Code of Conduct
  - A copy of KCSIE Part 1 (or Annex A for staff who do not directly work with children)
  - The Whistleblowing Policy
  - The Behaviour and Sanctions Policy
  - The Staff Acceptable Use Policy
- All staff are required to attend appropriate safeguarding and child protection training, including online safety training, on appointment and subsequent refresher INSET at regular intervals, at least annually, to continue to provide them with relevant skills and
  - knowledge to safeguard children effectively.
  - Formal INSET for staff will be supplemented with at least annual informal updates (e.g. by email and staff meetings) as required.
  - The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will attend appropriate biennial training provided by the Croydon Safeguarding Children Partnership in order to keep up to date with current knowledge in fulfilling their role. This includes training related to the governments' Prevent strategy.
  - The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead must attend the training provided specifically for Designated Safeguarding Leads (designated persons), which includes training on inter-agency working, at least once every two years.
  - The Headmaster must undergo the required child protection training and any additional training deemed necessary in order to understand safer recruitment procedures and processes, be able to apply them as a member of an appointment panel and to deal with allegations made against members of staff and volunteers. All appointment panels will always include someone who has undertaken safer recruitment training.
  - The Governor designated to oversee the School's Safeguarding and Child Protection Policy and the effective implementation of safeguarding practice will also receive appropriate safeguarding training.

## **10. ROLES AND RESPONSIBILITIES IN MANAGING SAFEGUARDING AND CHILD PROTECTION:**

### **10.1 ALL STAFF:**

All staff, which includes the Headmaster, teaching and operational staff, including temporary staff and all volunteers, have a statutory responsibility to:

- Provide a safe environment in which children can learn;
- Be prepared to identify children who may benefit from early help, know the factors that increase vulnerability as set out in Part 1 (or Annex A for those who do not work directly with children) of Keeping Children Safe in Education, and be aware of the local process for early help and their role in it;
- Be aware of systems, policies and procedures within the School which support safeguarding:
  - The Safeguarding and Child Protection Policy
  - The Behaviour and Sanctions Policy

- The Staff Code of Conduct
  - The Safeguarding Response to Children who go missing from education (Missing Pupil Policy)
  - The role and identity of the Safeguarding Lead and deputies;
- Be aware of the referral processes in relation to child welfare concerns, as set out in Part 1 and Annex A of Keeping Children Safe in Education ('What school and college staff should do if they have concerns about a child'), especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm), along with the role they might be expected to play in such assessments;
  - Be aware that safeguarding issues can manifest themselves via child-on-child abuse, which is more likely to include, but may not be limited to: bullying, physical abuse, sexual violence, sexual harassment, sharing nudes (sexting / youth produced sexual imagery), initiation / hazing rituals.
  - Know what to do if a child tells them he/she is being abused or neglected and know how to manage the requirement to manage an appropriate level of confidentiality (see Section 5);
  - Be aware of the signs of abuse and neglect so that they are able to identify children who may be in need of help or protection (see Appendix A);
  - Work with the DSL and, if required, to support social workers to take decisions about individual children.
  - Be aware that concerns relating to female genital mutilation should be reported to the Designated Safeguarding Lead (or Deputy), and that there is a specific legal duty on teachers to inform the police about any concerns about female genital mutilation.
  - Refer safeguarding concerns or allegations made about other members of staff, including supply staff and volunteers, to the Headmaster, and concerns/allegations about the Headmaster to the Chair of Governors
  - Raise concerns about poor or unsafe practice, and potential failures in the school's safeguarding regime with the Senior Management Team, and if concerns persist, through other whistleblowing channels.
  - Make a direct referral to the relevant Safeguarding Children Partnership or the police immediately if, at any point, there is a risk of immediate serious harm to a child.

## **10.2 THE HEADMASTER:**

- Ensure that the safeguarding and child protection policy and procedures adopted by the Governing Body are implemented and followed by all staff;
- ensure that all staff undergo safeguarding and child protection training (including online safety) at induction.
- Allocate sufficient time and resources to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Ensure that an environment exists with the School in which all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children is dealt with in accordance with the Whitgift Foundation's whistle blowing procedures;

- Ensure that children’s safety and welfare, including online safety, is addressed through the curriculum.
- Ensure that when there is a safeguarding concern, the child’s wishes and feelings are taken into account when determining what action to take and what services to provide.
- Keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.

### **10.3 DESIGNATED SAFEGUARDING LEAD:**

The broad areas of responsibility for the School’s Designated Safeguarding Lead, as per Annex C of Keeping Children Safe in Education 2025, are described below.

The Designated Safeguarding Lead is a member of the Senior Leadership Team and takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

This person should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and / or to support other staff to do so – and so to contribute towards the assessment of children.

#### 10.3.1 Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children’s social care as required and operational staff who make referrals to local authority children’s social care;
- to the Channel programme where there is a radicalisation concern as required, and operational staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service, as required;
- where a crime may have been committed to the Police as required. [NPCC – When to Call the Police](#) should help to understand when to consider calling the police and what to expect when working with the police.

#### 10.3.2 Work with Others

The designated safeguarding lead is expected to:

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners
- Liaise with the Headmaster to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

- As required, liaise with the “case manager” (as per Part 4 of KCSIE) and the LADO (Local Authority Designated Officer) for child protection concerns in cases which concern a staff member
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, Senior Mental Health Leads and the Head of Learning Support) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;
- Liaise with the Senior Mental Health Lead where safeguarding concerns are linked to mental health
- Promote supportive engagement with parents / carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting education outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experiences, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school. This includes:
  - Ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort
  - Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended there is still a lasting impact on children’s educational outcomes

### 10.3.3 Training, Knowledge and Skills

The Designated Safeguarding Lead and Deputies will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The Designated Safeguarding Lead and deputies will undertake Prevent awareness training.

Training should provide the Designated Safeguarding Lead and Deputies with a good understanding of their own role, how to identify, understand and respond to specific needs that increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children’s social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- Understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

#### 10.3.4 Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- Ensure that staff are supported during the referrals process
- Operational staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support

### 10.3.5 Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### 10.3.6 Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five KCSIE 2025, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

### 10.3.7 Raising Awareness

The Designated Safeguarding Lead shall

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the School's Safeguarding and Child Protection is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Governors regarding this;
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the School in this;
- link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on local safeguarding arrangements.

- Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.

#### 10.3.8 Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date and that information is stored securely and kept confidential (only sharing in line with information sharing advice set out in Keeping Children Safe in Education).

Records should include:

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

The designated safeguarding lead will ensure the safeguarding file is only accessed by those who need to see it, and where content is shared that this happens in line with information sharing advice as set out in Part 1 and 2 of KCSIE.

Where children leave the school (including for in-year transfers) the Safeguarding Lead will ensure their child protection file is transferred to the new school or college as soon as possible and within 5 days of the transfer (in year) or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. When students join the school, the Safeguarding Lead will ensure safeguarding files or nil returns are received from the previous school and share relevant material with the Head of Learning Support. Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes.

In addition to the child protection file, the Safeguarding Lead will consider whether it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard the child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have support in place for when the child arrives.

#### 10.3.9 Availability

The Designated Safeguarding Lead or Deputies are available to discuss matters of concern with pupils, staff and parents throughout the school day.

During any period of remote provision, members of the Safeguarding Team will continue to be available to deal with concerns raised by staff, students, parents or others about the safety and welfare of children, to provide advice to colleagues who have concerns about children or about the behaviour of staff or volunteers

towards children, to record and update concerns using the online record keeping system and to make referrals to Children's Services or other outside agencies as appropriate. Usually Teams will be used for communication during remote provision. However, should there be a requirement for a member of the Safeguarding Team to be in school to deal with an issue in person, it will usually be possible for the Safeguarding Lead to travel to the school at short notice to complete the tasks required.

In the event of an out of hours enquiry, the DSL can be reached by phoning the mobile number provided in section 4 of this document. It should be noted, however, that this is not an emergency 24-hour on-call system, and there will be times when it is not possible for the phone to be answered immediately. If the concern is urgent, relating to a young person who may be at immediate risk of harm, the advice is to call 999. See Section 5.1 for further details.

#### **10.4 DEPUTY DESIGNATED SAFEGUARDING LEADS:**

The DDSLs have been trained to the same level as the Designated Safeguarding Lead. The Designated Safeguarding Leads have the status and authority within the School to carry out the duties of the Safeguarding Lead in his/her absence and are authorised to commit resources and support and direct staff as appropriate.

In the absence of the DSL, the functions of the DSL will be carried out by one of the DDSLs. However, the ultimate lead responsibility for child protection remains with the Designated Safeguarding Lead and this responsibility will not be delegated.

In this policy, reference to the DSL includes the deputy DSL where the DSL is unavailable.

#### **10.5 GOVERNORS:**

Governors of both the School and the Court recognise their overall responsibility to ensure compliance with child protection statutory requirements. Governors take seriously their responsibility of duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. The reporting of safeguarding practice at the School enables Governors to ensure compliance with current legislation and to identify areas for improvement. Governors recognise that close liaison with the local authorities is also vital in order that appropriate support and training can be given.

Governors will ensure that:

- They facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy.
- Child Protection policy and procedures are in accordance with the Croydon Safeguarding Children Partnership guidance;
- All staff undergo safeguarding and child protection training (including online safety) at induction.

- That systems are in place, and well promoted, easily understood and easily accessible , for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- That when there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- The school operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff, including supply staff, and volunteers who work with children;
- There are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children.
- They do all that they reasonably can to limit children's exposure to risks from the school's or college's IT system. This includes ensuring the school has appropriate filters and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.
- The Safeguarding and Child Protection policy contains key information about procedures and attitudes to minimise the risk of child-on-child abuse, recognise this behaviour when it does occur and manage incidents appropriately when they do occur.
- They undertake an annual review of the school's child protection policy and procedures and of the efficiency and effectiveness with which the related duties have been discharged. The review may be conducted in the first instance by the Welfare sub-committee, but the annual approval of the policy is given by a full meeting of the governing body.
- The school has procedures for dealing with allegations of abuse against staff, including supply staff, and volunteers that comply with agreed Croydon Safeguarding Children Partnership's procedures.
- Relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.
- They ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- They should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements (see section 10.5.1, 10.5.2, 10.5.3 below)

The Chair of the Trinity School Committee is responsible for liaising with the local Authority Allegations manager/ lead officer for Child Protection in the event of allegations of abuse being made against the Headmaster.

#### 10.5.1 Governance and Legislation: Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

#### 10.5.2 Governance and Legislation: Equality Act

According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics – including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

### 10.5.3 Governance and Legislation: Public Sector Equality Duty

This legislation is part of the equalities act and applies to state-funded schools. The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.

## 11. SUPPORTING STAFF

- The School recognises that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- The School will support such staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and to seek further support, if required.

## 12. HOMESTAY ARRANGEMENTS DURING EXCHANGE VISITS

### 12.1 SUITABILITY OF ADULTS IN UK HOST FAMILIES

When arranging a homestay, the school will consider the suitability of the adults in the families who will be responsible for the visiting child during the stay. Where the school has arranged for a visiting child to be provided with care and accommodation in the home of a family to which the child is not related, the responsible adults will be engaging in regulated activity for the period of the stay, and where the school has the power to terminate such a homestay, the school is the regulated activity provider. Therefore, the school will obtain a DBS enhanced certificate with barred list information in order to establish whether the adults are barred from engaging in regulated activity relating to children and to consider in cases where criminal record information is disclosed, alongside other intelligence obtained, whether the adult will be a suitable host for a child. The school will also consider whether it is necessary to obtain a DBS enhanced certificate in respect of others aged 16 and over in the household where the child will be staying.

Where a period of UK homestay lasts 28 days or more, for a child aged under 16 years of age (under 18 years of age if the child has disabilities), this may amount to private fostering under the Children Act 1989. In these cases, the school will notify the local authority of the arrangements.

## **12.2 SUITABILITY OF ADULTS IN HOST FAMILIES ABROAD**

It is not possible for the School to obtain criminality information from the DBS about adults who provide homestays abroad. The School will liaise with partner schools abroad, to establish a shared understanding of, and agreement to, the arrangements put in place for the visit. Professional judgement will be used to decide whether the arrangements are appropriate and sufficient to safeguard effectively every child who is taking part in the exchange. The risk assessment for each homestay trip will outline the measures agreed to safeguard Trinity pupils (eg daily contact with school staff, emergency contact phone numbers so pupils know who to contact should a situation arise that makes them feel uncomfortable or unsafe). Parents will be made aware of the agreed arrangements. The School will consider whether it is necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestays outside of the UK.

## **13. ONLINE SAFETY**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The use of technology has become a significant component of many safeguarding issues e.g. child sexual exploitation or radicalisation. Technology often provides the platform that facilitates harm and the School is aware that there are four areas of risk associated with online safety:

- content: being exposed to illegal, inappropriate or harmful material, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- contact: being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. Concerns about this type of risk to pupils, students or staff, should be reported to <https://apwg.org/> the Anti-Phishing Working Group.

The School acknowledges that our pupils will use mobile devices and computers and recognises that they are important tools for communication and education as well as for recreation and socialising. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing

children to engage in harmful conversations, webcam photography or face-to-face meetings.

- The School takes a whole school approach to online safety, ensuring online safety is a running and interrelated theme when devising and implementing policies and procedures and seeks to protect and educate the whole school community in their use of technology and has in place filters and monitoring systems to identify, intervene and escalate any incident where appropriate. This includes considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.
- In the event of concerns about an online hoax or harmful online challenge, the school will take a proportionate response to sharing information with students and parents, aiming to provide helpful information as needed but not to cause distress or to encourage engagement with this content. The school will refer to government advice ('Harmful online challenges and online hoaxes February 2021') and, where necessary will seek expert advice from an organisation such as the Professional's Online Safety Helpline run by the Safer Internet Centre.
- The School's Code of Conduct and ICT Acceptable Use Policy explains the responsibilities of staff in relation to keeping children safe while online (whether in school or not) and educates both staff and pupils in online-safety.
- Pupils receive guidance on the safe use of the internet (including anti-bullying) through the Computing and Personal Development curricula and in year group assemblies and via external providers such as Childnet and Digital Awareness UK. Parents are also invited to a seminar presented by the external provider at this time, and there is additional information for parents to support their children to stay safe online on MySchoolPortal. The School is committed to ensuring that its pupils are aware of the dangers associated with the use of online technology so that they are equipped with the necessary skills to stay safe at all times, whether at school or not.
- The School recognises that 4G and 5G technology enables pupils to access the internet while not connected to the School's local area of wireless network. This access means some children, whilst at school, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. The school takes the following measures to enhance the online safety of pupils:
  - Students in the Sixth Form may have mobile phones with them at school, but these must be switched off during lessons and other activities
  - Students in the Lower School and Middle School are required to keep their mobile telephones in their lockers during the day (including break and lunch) and must have permission from a member of staff before using them. Use will only be granted for vital calls e.g. to parents.
  - Educating students about the legal and personal consequences of sharing indecent images, sexual harassment, and harmful online content, including pornography, through the tutorial system, the Personal Development curriculum and the Sixth Form Diploma course.

- Cyber-bullying by children, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through our Anti-Bullying Policy and procedures.

*(See 'Online Safety Policy' and 'Staff, Pupil and Visitor Acceptable Use Policies' for further details)*

Additional information to support online safety (including when children are online at home) is provided in Annex C of Keeping Children Safe in Education.

### **13.1 FILTERING AND MONITORING**

In order to safeguard and promote the welfare of children and provide them with a safe learning environment, the governing body will do all that it reasonably can to limit children's exposure to the above risks from the School's IT system. This includes ensure the school has appropriate filtering and monitoring systems in place and that their effectiveness is regularly reviewed. The governors will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place, manage them effectively and know how to escalate concerns when identified. In order to achieve this, the following should be considered: the number of and age range of the children, those who are potentially at greater risk of harm, how often they access the IT system and the proportionality of costs versus safeguarding risks.

As per KCSIE 2025, the appropriateness of filtering and monitoring systems is a matter for the School, and is informed in part by the Prevent Duty. At Trinity, online activity is proactively filtered and monitored using commercial products: Sophos XG, Senso and Lightspeed Alert and Filter. These products block staff and pupil access to inappropriate sites e.g. gambling and pornography and provide reports of any attempts by pupils and/or staff to access inappropriate sites. The list of sites blocked by these filters are routinely updated by the service providers.

As per the Department for Education filtering and monitoring standards, the School:

- Identifies and assigns roles and responsibilities to manage filtering and monitoring systems
- Reviews filtering and monitoring provision at least annually
- Blocks harmful and inappropriate content without unreasonably impacting teaching and learning
- Has effective monitoring strategies in place to meet safeguarding needs
- can use the department's ['plan technology for your school service'](#) to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

The governing body will review these standards and discuss with IT staff and service providers what more needs to be done to support the school to meet this standard.

To ensure these standards are met at Trinity, and that filtering and monitoring is regularly reviewed, a working group comprising the Head of IT Services, the

Director of Digital Strategy, the Senior Deputy Head and the Designated Safeguarding Lead will meet at least termly to discuss and review provision.

The DfE guidance 'Generative AI: product safety expectations' will be used to inform approaches to generative AI.

### **13.2 INFORMATION SECURITY AND ACCESS MANAGEMENT**

The School is responsible for ensuring the appropriate level of security protection procedures in place, in order to safeguarding systems, staff and learners. These procedures are reviewed periodically to keep up with evolving cybercrime technologies, and to ensure that the [Cyber Security Standards for schools](#) are met.

### **13.3 REVIEWING ONLINE SAFETY**

Technology, and risks and harms related to it, evolve, and change rapidly. Trinity School will undertake an annual risk assessment (reviewed every term) that considers and reflects the risks our students face.

## **14. SAFER RECRUITMENT**

- The School is committed to safer recruitment and all necessary pre-employment checks will be carried out in accordance with Department for Education guidance (as found in 'Keeping Children Safe in Education 2025') and the Croydon Safeguarding Children Partnership. At least one person on every recruitment panel will have received 'Safer Recruitment' training. *(See 'Recruitment and Selection Policy' for further details)*

### **14.1 ALTERNATIVE PROVISION**

- Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

## **15. SECURE PREMISES**

- School premises: The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.
- Visitors' sign in and identification badges: The School has an electronic sign in system (InVentry) where all visitors (including parents, alumni and Governors) must sign in on arrival and sign out on departure. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises.
- Staff photographs: photographs of all teaching and operational staff are available in Teams.

## **16. USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES**

When facilities are rented to other organisations or individuals, such as community groups or sports associations that are not under the direct supervision or management of school staff, the safeguarding and child protection policies and

procedures of that external organisation will be checked as part of the hiring agreement, and arrangements will be made to that liaison with the School can happen as appropriate. These checks and arrangements will be part of the hire agreement as a condition of use of the premises and failure to comply will result in the termination of the agreement. The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

If the School receives an allegation relating to an incident that occurred when an individual or organisation was using the premises for the purposes of running activities for children (eg community groups, sports clubs or service providers that run co-curricular activities) the school will follow our safeguarding policy and procedures, including informing the LADO.

## **17. PHYSICAL INTERVENTION/POSITIVE HANDLING AND 'REASONABLE FORCE'**

- 'Reasonable force' refers to a broad range of actions used by staff that involve a degree of physical contact to control or restrain children, and 'reasonable' means 'using no more force than is needed'. The decision on whether to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.
- In incidents involving children with SEN or disabilities or with medical conditions, the risks should be considered carefully, recognising the additional vulnerability of these groups. Duties under the Equalities Act (2010) in relation to making reasonable adjustments, non-discrimination and equality duties should be considered, and where possible planned positive and proactive behaviour support should be in place to reduce the likelihood of an incident.
- The School's guidance is that that staff must only ever use physical intervention as a last resort, e.g. when a child is endangering him/her or others and that, at all times it must be the minimal force necessary to prevent injury to another person.
- Such events should be recorded in writing by the member of staff who intervened and counter-signed by a witness. Incidents involving the use of restraint should be reported to the Deputy Headmaster and Designated Safeguarding Lead. The Deputy Headmaster will inform the parents of the pupil(s) who needed to be physically restrained.
- We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

*(See ['Staff Code of Conduct'](#) for further details)*

## **18. PHOTOGRAPHY AND IMAGES**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images. To protect our pupils, we

seek parental consent to take photographs of their children. We will take seriously concerns raised by any parents, pupil or member of staff if they are worried about any photograph that has been taken of any member of the School community.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

From time-to-time professional photographers are invited into the School to take group photographs or pictures of significant events; any professional photographers hired by the School will be subject to appropriate vetting checks.

Students are not allowed to take photographs or video footage (on the school site or off-site during school trips) of other members of the school community (including staff and parents) without the express permission of the individual(s) concerned.

Expectations of staff are made clear in *The Staff Code of Conduct*

CCTV is located around the School but is not installed in classrooms, changing rooms or toilet areas. The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.

*(See 'CCTV System Policy' for further details)*

## **19. HEALTH & SAFETY**

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the school environment and, for example, in relation to internet use, and when away from the school when undertaking school trips and visits.

*(See Health and Safety Policy for further details)*

## **20. PASTORAL AND SAFEGUARDING EDUCATION**

The School promotes the welfare of children through the assembly programme, Personal Development curriculum, Sixth Form Diploma lessons, the Computing curriculum and parent meetings.

*(See 'Personal Development Policy' and *Relationships and Sex Education Policy* for further details)*

Pupils at Trinity School receive guidance on a wide range of topics relating to their health, safety and wellbeing from their tutors (during form periods) Heads of Year (during assemblies), visiting speakers and in Personal Development (Years 1 – 5) and Diploma (Sixth Form) lessons.

Matters discussed include: online safety, first aid, transport safety, knife-crime, drugs and substance misuse, relationships and sex education (including consent),

bullying, peer pressure, homophobia and hate crimes, stress and mental health. Much of this content is mandated by the Department for Education's [statutory guidance](#).

## **21. ANTI-RADICALISATION AND PREVENTING PUPILS FROM BEING DRAWN TO TERRORISM**

The School is committed to safeguarding its pupils from radicalisation/ extremism and preventing them from being drawn to terrorism. Staff will use their judgement in identifying children who might be at risk of radicalisation and pass concerns to the Designated Safeguarding Lead or Deputies.

The School is equally committed to working with relevant sectors and institutions if it is discovered that a member of the School's community is in danger of becoming/ has become radicalised or has been/ is in danger of being drawn to terrorism.

Referrals can be made to Mr Haydar Muntadhar, Croydon's Prevent Manager. Tel: 0208 726 6000 (ext. 88974), 07562 438898

[Haydar.Muntadhar@croydon.gov.uk](mailto:Haydar.Muntadhar@croydon.gov.uk); [Channel@croydon.gov.uk](mailto:Channel@croydon.gov.uk)  
or to [safercroydon@croydon.gov.uk](mailto:safercroydon@croydon.gov.uk)

The police have Prevent Engagement Officers (PEOs) who work with the public and partner agencies to prevent terrorism and violent extremism from taking root in our communities. These officers aim to safeguard individuals and institutions from all forms of terrorist ideology and work closely with partner agencies such as local authorities, schools, Universities and health institutions, to ensure communities in Surrey are well placed to report and respond to terrorist related concerns.

The Police can be contacted to find out more around the Prevent strategy or to express concerns about links to terrorism or violent extremism. (*See Prevent and Anti-Radicalisation Policy for further details*)

All guest speakers invited to address pupils, staff and/or parents will be approved by the Headmaster in advance of arriving onsite. The Headmaster will assess the suitability of all guest speakers, at all times paying due regard to Prevent Duty guidance, and reserves the right to cancel the appearance of any guest speaker if he has any reservations as to their suitability to address any members of the school community.

## **22. ATTENDANCE**

The School recognises that a child going missing from education, being absent for prolonged periods and/or on repeated occasions is a potential indicator of abuse or neglect or other welfare concerns and has in place procedures to follow up on unauthorised absences. Multi-agency working is essential when children are absent from school and potentially at greater risk of harm. This includes liaising with social workers where a child is on a child in need or child protection plan or is looked after by the local authority.

The legal framework governing school attendance is summarised in the statutory guidance *Working Together to Improve School Attendance* (2024) published by the Department for Education (DfE) [Working together to improve school attendance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/working-together-to-improve-school-attendance)

The school complies with the statutory guidance from the DfE outlining schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points. The guidance can be found here <https://www.gov.uk/government/publications/children-missing-education>

The School also complies with guidance published by the Independent Schools' Inspectorate (ISI) and advice published by the Croydon Local Education Authority (LEA), regarding school attendance, which can be found by following this link: [www.croydon.gov.uk/education/schools-new/attendance](http://www.croydon.gov.uk/education/schools-new/attendance).

Parents or guardians are required to ensure that their children receive efficient, full-time education. Schools are responsible for recording pupil attendance twice a day; once at the start of the morning session and once during the afternoon session. Attendance at Trinity is monitored through such registration, and a record is kept.

Pupils are encouraged to take full advantage of their educational opportunities through maximum attendance, and are expected to attend all prescribed lessons and activities. Parents and teachers have a duty to ensure that pupils attend school for every school day except in the case of illness or if prior permission for absence has been granted.

*(See 'Attendance Policy' and 'Missing Pupil Policy' for further details)*

## **23. DATA PROTECTION**

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

The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The legislation is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Further information for organisations can be found here: [For organisations | ICO](#)

Information stored and shared for safeguarding purposes by the School is treated as 'special category personal data'. The 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category

personal data. It can be shared without consent when there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It is legitimate to share information without consent where it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, and if to gain consent would place a child at risk. The legislation also covers withholding data, so that schools should not provide pupil's personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt the School will seek independent legal advice.

Part Two of Keeping Children Safe in Education 2025 has links to further sources of guidance on information sharing.

## **24. POLICY REVIEW**

The Trinity School Committee is responsible for ensuring the annual review of this policy and will scrutinise both the effectiveness of the procedures included in the policy and their implementation. Where deficiencies are observed in policy and procedures before the annual review, the Designated Safeguarding Lead and Senior Deputy Head shall ensure that these are remedied as soon as possible and an updated policy will be presented to the Headmaster, who will request interim approval from the Chair of the Trinity School Committee and the nominated governor for child protection and safeguarding.

The School's Safeguarding and Child Protection Policy will be reviewed annually in September and additionally if there are changes to the regulations at other times of the year. In addition, the Head of Human Resources of the Whitgift Foundation will work with the School to ensure the policy and processes in it reflect any changes in the regulations, particularly with regard to staff. The School will draw on the expertise of staff in shaping the safeguarding arrangements and policies, to ensure that the School considers at all times what is in the best interests of its pupils.

The School's Safeguarding and Child Protection Policy will then be reviewed by the Welfare Committee and referred to the Trinity School Committees for scrutiny before being submitted to the Education Committee of the Whitgift Foundation, where any amendments to the policy to reflect changes in the legislation will be highlighted. The Education Committee will have a standing agenda item of 'Safeguarding' to review any changes to the policy and any other significant safeguarding issues that have occurred within the School.

The Court will have a standing agenda item of 'Safeguarding' on its agenda to ratify the School's Safeguarding and Child Protection Policy, which will be attached to committee papers of the December meeting and any changes highlighted and discussed at the meeting, and to discuss any other significant safeguarding issues that have occurred within the School. The examination and ratification of the Safeguarding and Child Protection Policy, and a note of any discussion points, will be carried out by the Court.

Author / Reviewer:	Sam Cater (Assistant Head Safeguarding, DSL)
Date of last review:	September 2025
Policy approved by:	Senior Management Team
Date of next review:	September 2026
Governor committees responsible for oversight:	Trinity School Committee and Welfare Sub-Committee

## **APPENDIX A – ABUSE**

### **Definition of Abuse from Keeping Children Safe in Education 2024**

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

**All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.**

A child is considered to be abused or at risk of abuse when the basic needs of the child are not

being met through avoidable acts of either commission or omission. The harm includes neglect, ill-treatment, physical, sexual or emotional abuse, impairment of physical or mental health or impairment of physical, intellectual, emotional or social development. All members of staff should familiarise themselves with the typical signs and symptoms as set out below:

### **General Indicators of Child Neglect and Abuse**

There are a number of indicators that have been put forward by professionals in the field of child protection in order to raise awareness in those who are working on a daily basis with children and their families. The following lists have indicators which apply to children and their parents.

Parents who may neglect or abuse their children may exhibit the following:

- Rejection of the child
- Rough handling of the child
- Failure to keep appointments with child care staff
- Frequent visits to the medical services with trivial complaints about the child or themselves

Children who may be suffering from neglect or abuse may exhibit the following:

- Unexplained failure to thrive
- Injuries that are inconsistent with the accident as described by the parents
- Frequent bruising, cuts, burns, etc.
- Frozen awareness, when the child carefully watches adults' expressions and movements

- Reluctance to be alone with their carer/s (e.g. teacher/ coach)
- Sudden unexplained changes in their reactions towards their carer/s

Not all children who have been neglected or abused will show all, or any, of these indicators, and one indicator alone may not denote that a child is being abused. A number of children may exhibit “failure to thrive” and doctors may not be able to find any reasonable explanation for this but this does not necessarily indicate that they have been a victim of abuse. A child with a combination of indicators who has a parent who is also exhibiting one of more of the adult indicators could lead a carer to suspect that they may be dealing with a case of abuse or neglect.

In the area of child sexual abuse there is a different set of indicators; most of these are related to the behaviour of the child:

- Sudden changes in personality, such as wanting constant attention and reassurance
- Lack of trust of a familiar adult
- Aggressive or compliant behaviour
- Withdrawal, listlessness, sadness
- Fear of being alone
- Showing affection in a sexual way inappropriate to their age
- Eating problems, loss of appetite, problems swallowing, excessive eating

### **Specific Indicators of Various Forms of Child Neglect and Abuse**

#### 5) Neglect:

##### *Physical Indicators*

- Poor hygiene
- Inadequately clothed, dirty, torn or inappropriate clothing
- Untreated medical problems
- Poor nourishment/failure to thrive
- Emaciation

##### *Behavioural Indicators*

- Tired or listless
- Low self-esteem
- Always hungry
- States that there is no one at home to look after them or indicates that they spend a lot of time at home alone

#### b) Physical Abuse:

##### *Physical Indicators*

- Unexplained bruising in places where an injury cannot easily be sustained or explained
- Facial bruising
- Hand or finger marks or pressure bruising
- Bite marks
- Burns (particularly cigarette burns), scalds
- Unexplained fractures
- Lacerations or abrasions

##### *Behavioural Indicators*

- Shying away from physical contact
- Withdrawn or aggressive behaviour
- Sudden changes in behaviour, e.g. from extrovert to introvert

#### c) Sexual Abuse:

### *Physical Indicators*

- Bruises or scratches inconsistent with accidental injury
- Difficulty in walking or sitting
- Pain or itching in the genital area
- Torn, stained or bloody underclothes
- Loss of appetite

### *Behavioural Indicators*

- Sexually precocious, uses seductive behaviour towards adults
- Uses sexually explicit language
- Excessive preoccupation with sexual matters
- Informed knowledge of adult sexual behaviour
- Poor self-esteem
- Withdrawn or isolated from other children

### d) Emotional Abuse:

- Attention seeking
- Withdrawn
- Telling lies
- Inability to have fun
- Low self-esteem
- Tantrums past the age when they are part of normal development
- Speech disorders e.g. stammering
- Inability to play
- Indiscriminately affectionate

**Annex B of Keeping Children Safe in Education 2025, has further information on the following Safeguarding risks:**

- Child abduction and community safety incidents
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County lines
- Modern Slavery and the National Referral Mechanism
- Cybercrime
- Domestic abuse
- Homelessness
- So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)
- FGM
- Forced marriage
- Preventing radicalisation
- The Prevent duty
- Channel
- Additional Support
- Peer on peer/ child on child abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Upskirting
- The response to a report of sexual violence or sexual harassment

## APPENDIX B – ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

### Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early 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, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> 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](#).

<sup>4</sup> 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](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## APPENDIX C – USEFUL CONTACTS

Headmaster:	Alasdair Kennedy 0208 656 9541 <a href="mailto:hmsec@trinity.croydon.sch.uk">hmsec@trinity.croydon.sch.uk</a>
Designated Safeguarding Lead (DSL):	Sam Cater 0208 656 9541 07540 691099 <a href="mailto:sic@trinity.croydon.sch.uk">sic@trinity.croydon.sch.uk</a>
Deputy Designated Safeguarding Leads (DDSL):	Inga Sinclair 0208 656 9541 <a href="mailto:ims@trinity.croydon.sch.uk">ims@trinity.croydon.sch.uk</a>
	Jed Pietersen 0208 656 9541 <a href="mailto:jep@trinity.croydon.sch.uk">jep@trinity.croydon.sch.uk</a>
	Jack Munnery 0208 656 9541 <a href="mailto:jzm@trinity.croydon.sch.uk">jzm@trinity.croydon.sch.uk</a>
	Rosabelle Lattery-Lee 0208 656 9541 <a href="mailto:rll@trinity.croydon.sch.uk">rll@trinity.croydon.sch.uk</a>
	Hannah Carey 0208 656 9541 <a href="mailto:hcc@trinity.croydon.sch.uk">hcc@trinity.croydon.sch.uk</a>
	Victoria Boorman 0208 656 9541 <a href="mailto:vjb@trinity.croydon.sch.uk">vjb@trinity.croydon.sch.uk</a>
Chair of Trinity School Committee: (Member of the Whitgift Court of Governors)	Mr David Seymour <a href="mailto:seymourdavid1@yahoo.co.uk">seymourdavid1@yahoo.co.uk</a>
Chair of the Whitgift Foundation:	Fiona Fletcher-Smith
Lead Safeguarding Governor for the Whitgift Foundation	Mike Gascoigne <a href="mailto:MGE@johnwhitgiftfoundation.org">MGE@johnwhitgiftfoundation.org</a>
Local Police	Heathfield Safer Neighbourhood Team 0208 721 2468

[croydonheathfield.snt@met.police.uk](mailto:croydonheathfield.snt@met.police.uk)  
[Ali.d.macpherson@met.police.uk](mailto:Ali.d.macpherson@met.police.uk)  
[Nicholas.miles@met.police.uk](mailto:Nicholas.miles@met.police.uk)

CAIT police  
(Child Abuse Investigation Team) [Paul.R.Smith@met.police.uk](mailto:Paul.R.Smith@met.police.uk)  
(D.Inspector)

Met. Police Prevent Engagement Officer: Harvey Teague  
07766 206451

Local Authority Designated Officer (LADO): Jane Rowe (LADO)  
Business Support Officer: Karen Anns  
Direct line: 020 8726 6000 ext: 24817  
[lado@croydon.gov.uk](mailto:lado@croydon.gov.uk)

NSPCC whistleblowing helpline 0800 028 0285

Croydon Hate Crime & Prevent Coordinator: Haydar Muntadhar  
[haydar.muntadhar@croydon.gov.uk](mailto:haydar.muntadhar@croydon.gov.uk)  
0208 726 6000 (ext. 88974)

DfE Counter-Extremism Helpline 0207 340 7264  
[counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

Forced Marriage Unit 0207 008 0151  
[fmufco.gov.uk](mailto:fmufco.gov.uk)