Child Protection and Safeguarding Policy

2026-27

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Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Sam Cater	020 8656 9541 07540 691099 safeguarding@trinity.croydon.sch.uk sic@trinity.croydon.sch.uk
Deputy DSLs	Inga Sinclair Jed Pietersen Jack Munnery Rosabelle Lattery-Lee Hannah Carey	020 8656 9541 ims@trinity.croydon.sch.uk 020 8656 9541 jep@trinity.croydon.sch.uk 020 8656 9541 jzm@trinity.croydon.sch.uk 020 8656 9541 rll@trinity.croydon.sch.uk 020 8656 9541 hcc@trinity.croydon.sch.uk
Headmaster	Alasdair Kennedy	020 8656 9541 hmsec@trinity.croydon.sch.uk
Local authority designated officer (LADO)	Jane Rowe Business support officer: Karen Anns	020 8726 6000 ext: 24817 lado@croydon.gov.uk
Chair of Trinity School Committee	David Seymour	seymourdavid1@yahoo.co.uk
Child Protection Governor for the School	Paul Minton	pminton@trinity.croydon.sch.uk
Chair of the Whitgift Foundation	Fiona Fletcher-Smith	0208 680 8499
Channel helpline		020 7340 7264
NSPCC Whistleblowing helpline		0800 028 0285 Website

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 students 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 students 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 student. See section 11 and Appendix 2 for procedures.

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.

3. Principles and Aims

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 students 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), 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 students 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 'Early Help Assessment' (EHA) and 'Team Around the Child' (TAC) / 'Team Around the Family' (TAF) 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 students.

While decisions to seek support for a child in need would normally be taken in consultation with parents and students, 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

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. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 6).

- This policy is also based on the following legislation:
- Part 3 of the schedule to The Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of students (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled students. 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 student outcomes. Some students may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination

- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse

5. Definitions

Safeguarding and promoting the welfare of children means:

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

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

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

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

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

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs (see section 6 for more detail):

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

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

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

6. Multi-Agency Safeguarding Arrangements

The School works within the statutory safeguarding framework established by *Keeping Children Safe in Education* and the relevant local multi-agency safeguarding arrangements. The School recognises that, as an independent school based in Croydon, its students may reside in Croydon or in neighbouring or other local authority areas. Accordingly, the School maintains effective working relationships with the safeguarding partners and relevant agencies in Croydon and, where appropriate, with the local authority and safeguarding agencies responsible for the area in which a child lives.

Where a safeguarding concern arises, the School will follow the procedures and thresholds applicable to the child and the circumstances of the concern. This may include making a referral to the relevant local authority Children's Social Care or Multi-Agency Safeguarding Hub (MASH), seeking advice from the relevant safeguarding partnership, and working with the police, health services, Early Help and other agencies as appropriate.

For students ordinarily resident in Croydon, the School will work in accordance with the arrangements of the Croydon Safeguarding Children Partnership (CSCP), including relevant local thresholds, referral pathways, information-sharing arrangements and multi-agency procedures. Where a student resides outside Croydon, the School will liaise with the relevant local authority and safeguarding partnership for that area and will follow the applicable local procedures, while continuing to work with Croydon agencies where the circumstances of the case require this.

The School will cooperate with statutory safeguarding partners and other relevant agencies in assessments, strategy discussions, child protection enquiries, child protection conferences, multi-agency plans and reviews, where appropriate. The School will share relevant information lawfully and proportionately and will contribute to multi-agency safeguarding arrangements in accordance with statutory guidance and local procedures.

The Designated Safeguarding Lead (DSL), or an appropriately trained deputy, will ensure that staff understand the routes for reporting and escalating concerns and will seek advice from the relevant safeguarding agency where there is uncertainty about the appropriate referral pathway or threshold.

Where there is an immediate risk of harm, the School will contact the emergency services as appropriate. The School will not allow uncertainty about local authority boundaries or a child's place of residence to delay action to safeguard a child.

7. Equality Statement

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

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 14)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence. The School will respond appropriately to notifications concerning children placed in temporary accommodation.
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 18)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

8. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour and Sanctions policy
- Anti-bullying Policy
- Responding to a Racist Incident Policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem

- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

8.1 All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) in full, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety as appropriate when communicating with parents and carers and understand the school's expectations, roles and responsibilities in relation to filtering and monitoring.
- Contribute to creating a safe school environment for students who are LGB and Gender Questioning to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the Staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the Behaviour and Sanctions Policy, and the safeguarding response to children who go missing from education/who are absent from education.
- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific

safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- All staff will recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Staff will be alert to the impact that such experiences may have on a child's welfare, wellbeing, mental health and willingness to seek help, and will consider such concerns within safeguarding practice where appropriate.
- The safeguarding issues that often overlap and can put children at risk of harm, including:
- Drug taking and/or alcohol misuse
- Unexplainable and/or persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation
- Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection
- Appendix 2 of this policy outlines in more detail how staff are supported to do this.

8.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of SMT. The DSL at Trinity is Sam Cater. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL can also be contacted out of school hours, if necessary, on

07540 691099. However, this number should not be used in an emergency, when 999 should be used.

When the DSL is absent, the deputies will act as cover.

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.

If the DSL and deputies are not available or absent, we have cover arrangements in place. This includes:

- Using call forwarding on the safeguarding phone number
- We use a shared safeguarding mailbox
- Contact any duty member of SMT for support
- Use 999 in an emergency / contact Croydon Children's Services (see 11.2) or google contact details for the relevant local area Children's Services for that child.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Where a crime may have been committed, the DSL will use: NPCC – When to Call the Police. This should help to understand when to consider calling the police and what to expect when working with the police.
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- The DSL is also the School's Prevent Lead. All staff will have regular Prevent training and induction

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

8.3 The Governing Board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that all staff who work directly with children read **at least part 1** of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read **part 1** of KCSIE
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect students
- Ensure the school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Ensuring that reviews are carried out by the DSL who is the SMT member responsible for filtering and monitoring, with the support of the IT team. The

review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept

- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Our Low Level Concerns Policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and ensure that school staff inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

All governors will read Keeping Children Safe in Education (KCSIE) in its entirety.

Section 27.3 of this policy has information on how governors are supported to fulfil their role.

8.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems that support safeguarding, including this policy, as part of their induction

    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

8.5 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.

9. Homestay Arrangements During Exchange Visits

9.1 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.

9.2 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 students (e.g. daily contact with school staff, emergency contact phone numbers so students 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.

10. Confidentiality

- The School recognises that all matters relating to child protection are confidential.
- The Designated Safeguarding Lead will disclose personal information about a student 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.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and the protect the safety, of children.
- 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.
- If a victim asks the school not to tell anyone about sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, we may still lawfully share it if there's another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - 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
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.
- Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information) and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).
- Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving.
- Where a child protection file is transferred, the School will provide a clear and structured summary identifying current safeguarding concerns, relevant context and any ongoing support needs. Current safeguarding concerns will be distinguished clearly from historic information so that the receiving school can readily understand the child's current risks and needs. The receiving school will be contacted where clarification or discussion is necessary to ensure that safeguarding information is understood and acted upon appropriately.
- 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.
- The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. See also Section 34 on Data Protection which gives further guidance about sharing or withholding personal information in relation to safeguarding concerns.
- Confidentiality is also addressed in this policy with respect to record-keeping in section 25, and allegations of abuse against staff. See Low Level Concerns Policy for more detail.

11. Recognising Abuse and Taking Action

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help for a child who:

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)

- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a student referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

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. Early Help is also referred to as Family Help in KCSIE 2026.

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

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

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.** Please see section 11.2 for how to make a referral to Croydon Children's Services.

Tell the DSL as soon as possible if you make a referral directly.

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 student files. This includes 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 student 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.

See Appendix 2 for a flow chart illustrating actions to be taken when there are concerns about a child.

You can also use the following link to report child abuse to your local council:
https://www.gov.uk/report-child-abuse-to-local-council

11.2 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, 9am 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 students 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 (e.g. 'safeguarding children Bromley') or by using this link: https://www.gov.uk/report-child-abuse-to-local-council

- Reports of concerns under the Prevent duty should be made to channel@croydon.gov.uk . Further details about the Prevent duty and referrals can be found in section 11.6 and appendix 3 of this policy.

11.3 If a child makes a disclosure 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.

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- 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.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- 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.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Record your write up on CPOMS. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 11.2), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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 11.2 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)

11.3.1 If a child makes a disclosure of sexual violence or sexual harassment

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 (e.g. 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
- Record all notes on CPOMS and speak to the DSL / DDSL as soon as possible if not already involved.

11.4 If you discover that FGM has taken place or a student is at risk of FGM

Keeping Children Safe in Education (KCSIE) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 3 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is at risk of FGM or suspects that FGM has been carried out or discovers that a student aged 18 or over appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

Victims of FGM are likely to come from a community that is known to practise FGM – see Section 2.3 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

11.5 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 11.8, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of SMT and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Please refer to section 11.2 for information about how to make a referral to Early Help.

Referral

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

If you make a referral directly (see section 11.2), you must tell the DSL as soon as possible.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Please refer to section 11.2 for information about how to make a referral.

11.6 If you have concerns about extremism

The School is committed to safeguarding its students 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.

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of SMT and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Referrals can be made to Croydon's Prevent Manager: channel@croydon.gov.uk or to safercroydon@croydon.gov.uk

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a student. You can also report extremism in education here. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

All guest speakers invited to address students, 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.

See Prevent and Anti-Radicalisation Policy for further details

11.7 If you have a concern about mental health

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.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by informing the DSL. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

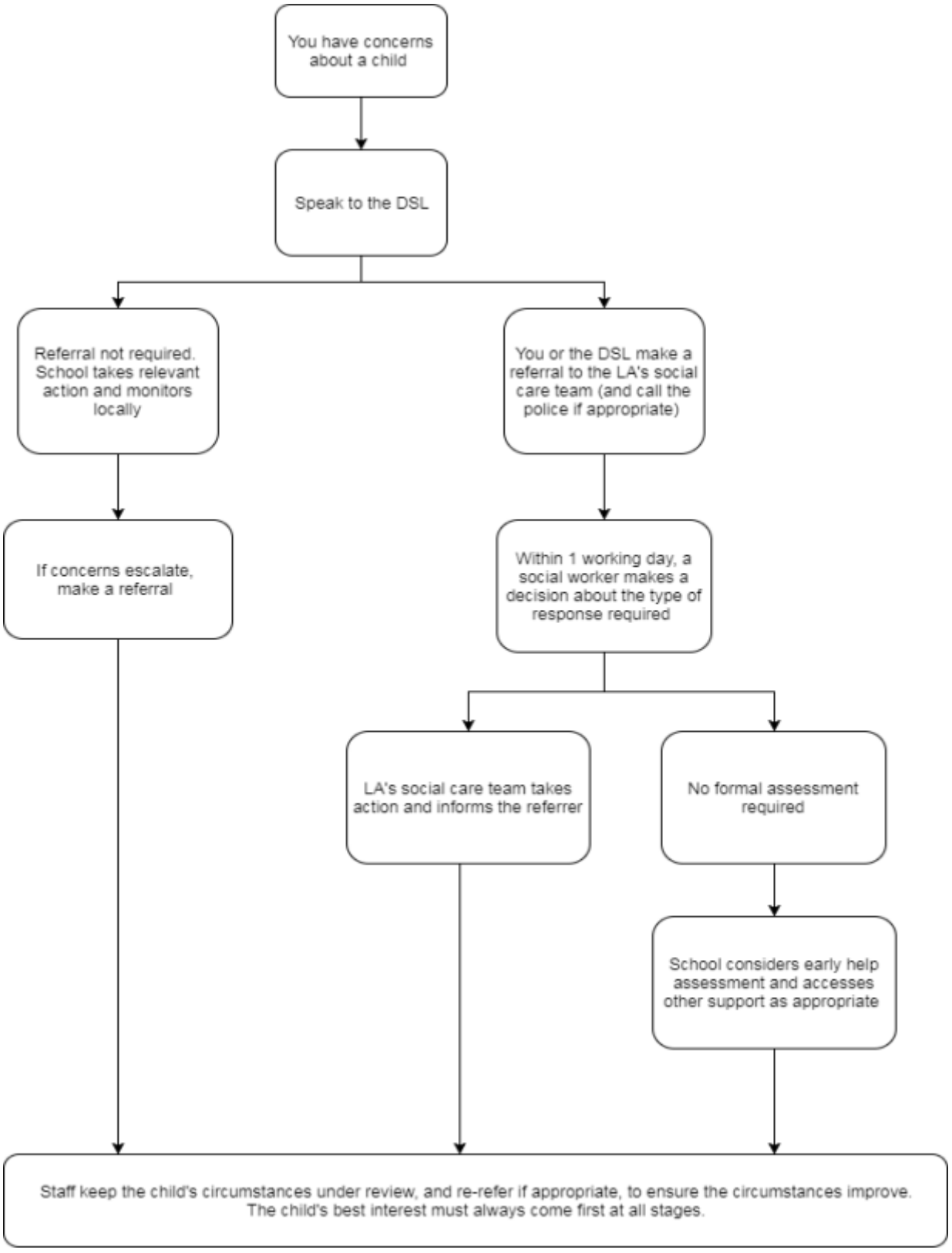
If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the Head of Year to agree a course of action.

Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

Figure 1: Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 8.2 for what to do. A more detailed flow chart is also available in Appendix 2)



11.8 Concerns about a staff member, supply teacher, volunteer or contractor

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.

11.8.1 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 (e.g. 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 2026 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.

11.8.2 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 11.8.1 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 2026, 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 2026.

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

11.9 Allegations of abuse made against other students (child-on-child abuse)

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh", "part of growing up", or "boys being boys", as

this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for students.

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

See appendix 3 for more information about child-on-child abuse.

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

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate students about appropriate behaviour and consent
- Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 11.13 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of

leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment

- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping students' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
    - That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The appropriate DDSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, such as by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

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

- Students 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 nudes / semi-nudes 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 students 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, students are not allowed to stay on the school site once the school day has ended.
- Staff recognise the vulnerability of students with SEND

See Anti-bullying Policy; Supervision of Students Policy; and the Behaviour and Sanctions policy for further information.

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

If a student makes an allegation of abuse against another student 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-5th 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 by the Head of Year. We use CPOMS to record this information.
- 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-5th 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 and contact the local authority children's social care team and / or CAMHS if appropriate.
- 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-5th Year concerns) will liaise with the Designated Safeguarding Lead and the police will be contacted.
- Head of Year / DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

Further details can be found in the Anti-bullying Policy and the Responding to a Racist Incident Policy.

11.11 Procedures for dealing with allegations of child-on-child abuse that include 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 (i.e. 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 students 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.

More detailed information about responding to the sharing of nudes or semi-nudes can be found below in section 11.12.

11.12 Making or sharing of nudes and semi-nudes

This approach is based on guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology.

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident (though in some cases this may not be appropriate) and members of the safeguarding team. This meeting will consider the initial evidence and the following areas before deciding next steps:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- 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 (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the images or videos is under 13
- The DSL has reason to believe a student is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the students involved (if appropriate).

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through initial contact with our neighbourhood police or dialing 101.

Recording incidents

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 25 of this policy also apply to recording these incidents.

Curriculum coverage

Students are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our PD programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to make, provide (or forward) such images
- The receipt of such images

This policy on the making or sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident.

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

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

11.13 Reporting systems for our students

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for students to confidently report abuse. This involves providing reporting buttons on the LUDUS 'Safeguarding, Safety and Welfare' pages, which is advertised to students by their tutors at least termly. This includes an anonymous reporting facility. Students are also encouraged to speak to their tutor and Head of Year.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students.
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback.

12. Online Safety and the Use of Mobile Technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default. In line with statutory guidance on mobile phones in schools, Sixth Form students are an exception and may have access to their phones in specific Sixth Form areas of the school.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

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

- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as 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** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

The School acknowledges that our students 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.
- The School will train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via communications sent directly to them and during parents' events. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present.
    - Staff will not take pictures or recordings of students on their personal phones or cameras unless given explicit consent and correct procedures are followed.
    - Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
    - Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones

- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
    - 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 student access to inappropriate sites e.g. gambling and pornography and provide reports of any attempts by students and/or staff to access inappropriate sites. The list of sites blocked by these filters are routinely updated by the service providers. Please see our Online Safety Policy for further information.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Carry out an annual review of our filtering and monitoring effectiveness. See section 12.1 for further information.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- 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 students in online-safety.
- Students 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 students 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 students 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 students:

  - 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 between lessons) 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.
- 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 digital and technology standards for schools are met.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our Online Safety Policy and Mobile Phone Policy which can be found on our website.

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

12.1 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 2026, the appropriateness of filtering and monitoring systems is a matter for the School, and is informed in part by the Prevent Duty.

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 Learning and Innovation, 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.

12.2 Artificial intelligence (AI)

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

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

The School will treat any use of AI to access harmful content or bully students in line with this policy and our Behaviour and Sanctions, Anti-Bullying, and Artificial Intelligence Policies.

Staff should be aware of the risks of using AI tools while they are still being developed. Please see our Artificial Intelligence Policy for more information on appropriate AI tools and uses in school.

Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE).

13. Notifying Parents or Carers

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

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Engage with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Engage with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them and the reason(s) behind any decision(s)

14. Students with Special Educational Needs, Disabilities or Health Issues

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
- The potential for students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

Any abuse involving students with SEND will require close liaison with the DSL (or deputy) and the Director of Learning Support. The school will consider extra pastoral support and attention for these children and ensure any appropriate support for communication is in place.

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.

15. Students with Medical Conditions

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

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

16. Young Carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

17. Students with a Social Worker

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

18. Looked-after and Previously Looked-after Children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements;
- The DSL has details of children's social workers and relevant virtual school heads and will work with them as appropriate.

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.

19. Students who are Lesbian, Gay or Bisexual

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, students who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our Anti-bullying Policy for more detail.

Risks can be compounded where children who are lesbian, gay or bisexual 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.

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

Any concerns should be reported to the DSL.

20. Students who are Questioning their Gender

20.1 Supporting students who are questioning their gender

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

We will take a strong, proactive stance on all forms of bullying based on gender. See our Anti-Bullying and Behaviour and Sanctions policies for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of students and staff in relation to their religion or belief.

When supporting a student questioning their gender, we will take into account the principle of taking a careful approach. See our Gender Questioning Student Policy for more information.

The DSL/DDSL will lead in these cases.

20.2 Involving parents/carers in cases of students questioning their gender

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

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

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

20.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a student or their parent/carer requests that the school makes changes or puts support in place to facilitate the student presenting as the opposite biological sex (“social transition”), we will work

together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

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

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

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

20.4 Rules on single-sex spaces

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

20.5 Rules on single-sex sports

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

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no

exceptions and students must not be allowed to participate in sports designed for the opposite sex.

21. Attendance and Children Missing Education

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)

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.

Parents or guardians are required to ensure that their children receive efficient, full-time education. Schools are responsible for recording student 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.

Students 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 students 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 Student Procedure for further details.

22. 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

Students 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.

23. Complaints and Concerns about School Safeguarding Policies

23.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff. See Low Level Concerns policy for more information.

23.2 Other complaints

Where the complaint gives rise to a safeguarding concern, the safeguarding concern will be dealt with under the School's safeguarding and child protection procedures and, where appropriate, the procedures in Part Four of KCSIE. The complaints process will not be allowed to delay appropriate safeguarding action, including referrals to children's social care, the LADO or the police where required.

All other complaints are handled in line with our Complaints Policy which lays out each of the stages of complaint. Please see our Complaints Policy for further details.

24. Whistleblowing

All staff and volunteers should feel able to raise concerns about:

- Poor or unsafe safeguarding practice; and
- Potential failures in the School's safeguarding provision.

These concerns will be taken seriously by the Senior Management Team.

Please see the Foundation Whistleblowing Policy (available on Staffzone) for further information.

25. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will 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

Concerns and referrals will be kept in a separate child protection file for each child and should only be accessed by those who need to see it.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file and that confirmation of receipt will be obtained.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

At Trinity, we use CPOMS to record concerns and hold our child protection and safeguarding records. We ensure that records are kept confidential by limiting access to the digital records to only appropriate personnel. Access is reviewed regularly including whenever there is a personnel change.

We will comply with the DfE's retention schedule as laid out in their Record keeping and management guidance:

Child protection files will normally be retained **until the child's 25th birthday**. Where a file relates to **child sexual abuse**, records will be retained **until the child's 75th birthday**, in accordance with current Department for Education records-management guidance.

In addition:

- Refer to our Recruitment and Selection Policy sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Our Low Level Concerns Policy sets out our policy on record-keeping with respect to allegations of abuse made against staff.

26. Safer Recruitment

- The School is committed to safer recruitment follows the safer recruitment requirements, principles and procedures set out in **Part Three of Keeping Children Safe in Education (KCSIE)** and complies with all relevant statutory requirements relating to recruitment, selection, pre-appointment checks and the maintenance of the Single Central Record.
- The School ensures that appropriate checks are undertaken in respect of staff, volunteers and other individuals as required by KCSIE and applicable legislation, and

that those involved in recruitment have appropriate safer recruitment knowledge and training. At least one person on every recruitment panel will have received ‘Safer Recruitment’ training.

- The School will determine whether individuals are engaging in regulated activity in accordance with the current statutory definition. From 1 September 2026, the previous supervision exemption from regulated activity has been removed. The School will therefore ensure that appropriate enhanced DBS and Children's Barred List checks are undertaken for staff, volunteers and others engaging in regulated activity in accordance with Part Three of KCSIE 2026
- Full details of the School's recruitment, selection, vetting and pre-appointment checking procedures are set out in the School's **Recruitment and Selection Policy**, which should be read alongside this policy.

27. Training

27.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school’s safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring, and the risk of AI harms
- Have regard to the Teachers’ Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all students

All staff will have training on the government’s anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually. At Trinity we provide a safeguarding update through INSET days three times per year. Safeguarding updates are also provided as necessary through our weekly staff bulletin and weekly staff briefing. Staff are required to confirm that they have read, understood and able to implement the School’s Child Protection and Safeguarding Policy. All staff are required to confirm that they have read Part One of the most recent version of Keeping Children Safe in Education (KCSIE).

Volunteers will receive appropriate training, if applicable.

27.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

The DSL will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

27.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

27.4 Recruitment – interview panels

As part of the interview process, at least 1 person involved in the selection process for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, key elements of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See our Recruitment and Selection Policy for more information about our safer recruitment procedures.

27.5 Staff who have contact with students and families

All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

28. Restrictive Interventions and Reasonable Force

The School is committed to safeguarding the welfare and dignity of all students and to minimising the need for restrictive interventions. Staff will seek, wherever practicable, to prevent situations from escalating through appropriate support, prevention and de-escalation strategies.

The School follows the Department for Education's guidance on Restrictive interventions, including the use of reasonable force, in schools**.** Reasonable force may be used only where it is lawful, necessary and proportionate. Any force used must be reasonable in the circumstances, using no more force than is necessary and for no longer than is necessary. Restrictive interventions will never be used as a form of punishment.

In considering whether and how to intervene, staff will have regard to the individual circumstances of the student, including any special educational needs and/or disabilities, communication needs, medical conditions and other relevant vulnerabilities, and the School will make reasonable adjustments where required.

The School does not operate a "no contact" policy. Appropriate physical contact may be necessary in certain circumstances to safeguard a student or others.

All relevant incidents of restrictive intervention will be recorded and reported in accordance with applicable statutory requirements and Department for Education guidance, including requirements relating to informing parents.

Where the use of reasonable force or another restrictive intervention gives rise to a safeguarding concern, including a concern about the conduct of a member of staff, this must be reported promptly to the DSL or Deputies and dealt with in accordance with this policy and, where applicable, Part Four of Keeping Children Safe in Education (KCSIE).

Full details of the School's approach to prevention, de-escalation, reasonable force, restrictive interventions, seclusion, recording, parental notification and post-incident review are contained in the School's Behaviour and Sanctions Policy and the Staff Code of Conduct, which should be read alongside this policy.

29. Alternative Provision

For the purposes of this policy, alternative provision includes any education arranged by the School for a student away from the School's usual educational setting, including placements with registered and non-school/unregistered alternative provision providers, where applicable.

Where the School places a student with an alternative provision provider, the School remains responsible for the safeguarding of that student and will take appropriate steps to satisfy itself that the placement is suitable, safe and meets the student's needs.

Before a placement begins, the School will undertake appropriate due diligence and safeguarding checks in respect of the provider and the proposed placement. This will include consideration of the provider's safeguarding arrangements and the suitability of those who will have contact with the student. Where non-school alternative provision is used, the School will have regard to the Department for Education's Voluntary National Standards for Non-School Alternative Provision and associated guidance.

The School will ensure that relevant safeguarding information is shared appropriately with the alternative provision provider and that there are clear arrangements for the provider to report safeguarding concerns to the School. The Designated Safeguarding Lead (DSL) will ensure that appropriate communication and information-sharing arrangements are established and maintained.

The School will maintain appropriate oversight of the student's welfare, attendance and progress throughout the placement. Any unexplained or concerning absence, change in behaviour or other safeguarding concern will be followed up promptly.

Where a safeguarding concern arises during an alternative provision placement, the School will follow its safeguarding procedures and, where appropriate, work with the provider, children's social care, the relevant local authority and/or other safeguarding partners.

Alternative provision placements will be kept under review to ensure that they continue to be appropriate and that the student remains safe.

30. 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.

31. 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 so 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.

32. 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 students, we seek parental consent to take photographs of their children. We will take seriously concerns raised by any parents, student 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 student 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 of the Data Protection Act, the UK GDPR and the Commissioner's Code of Practice. See 'CCTV System Policy' for further details.

33. Health and 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.

34. 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 (Use and Access) Act 2025 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: 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 student'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.

In deciding whether and how to share information, the School will have regard, where relevant, to:

- Working Together to Safeguard Children, including its guidance on information sharing;
- the Department for Education's Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers, including the seven golden rules for information sharing;
- the Information Commissioner's Office (ICO) guidance on sharing information to safeguard children and young people; and
- the Department for Education's guidance on data protection in schools.

Part Two of Keeping Children Safe in Education 2026 has links to further sources of guidance on information sharing.

35. Monitoring Arrangements

This policy will be reviewed annually in September by Sam Cater (Assistant Head Safeguarding / DSL) and additionally if there are changes to the regulations at other times of year. At every review, it will be approved by SMT and by the Trinity School Committee.

The Trinity School Committee 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.

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 students.

The School's Child Protection and Safeguarding 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.

36. Links with other Policies

This policy links to the following policies and procedures:

- Behaviour and Sanctions Policy
- Anti-bullying Policy
- Responding to a Racist Incident Policy
- Staff Code of Conduct
- Complaints Policy
- Health and safety Policy
- Attendance Policy
- Online safety Policy
- Social Media Policy
- Artificial Intelligence Policy
- Mobile phone Policy
- Relationships and Sex Education Policy
- Gender Questioning Child Policy
- Looked After Children Policy
- Mental Health Policy
- First aid
- Trips – Educational Visits and Trips Policy
- Trips – Student Safety While Being Hosted (Homestays & Exchanges)
- Curriculum Policy
- ICT Acceptable Use Policies: Staff, Students and Visitors
- Low Level Concerns Policy
- Prevent and Anti-radicalisation Policy
- Recruitment and Selection Policy

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education (KCSIE) 2026.

Appendix 1: Types of Abuse

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 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. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. 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 participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- 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.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

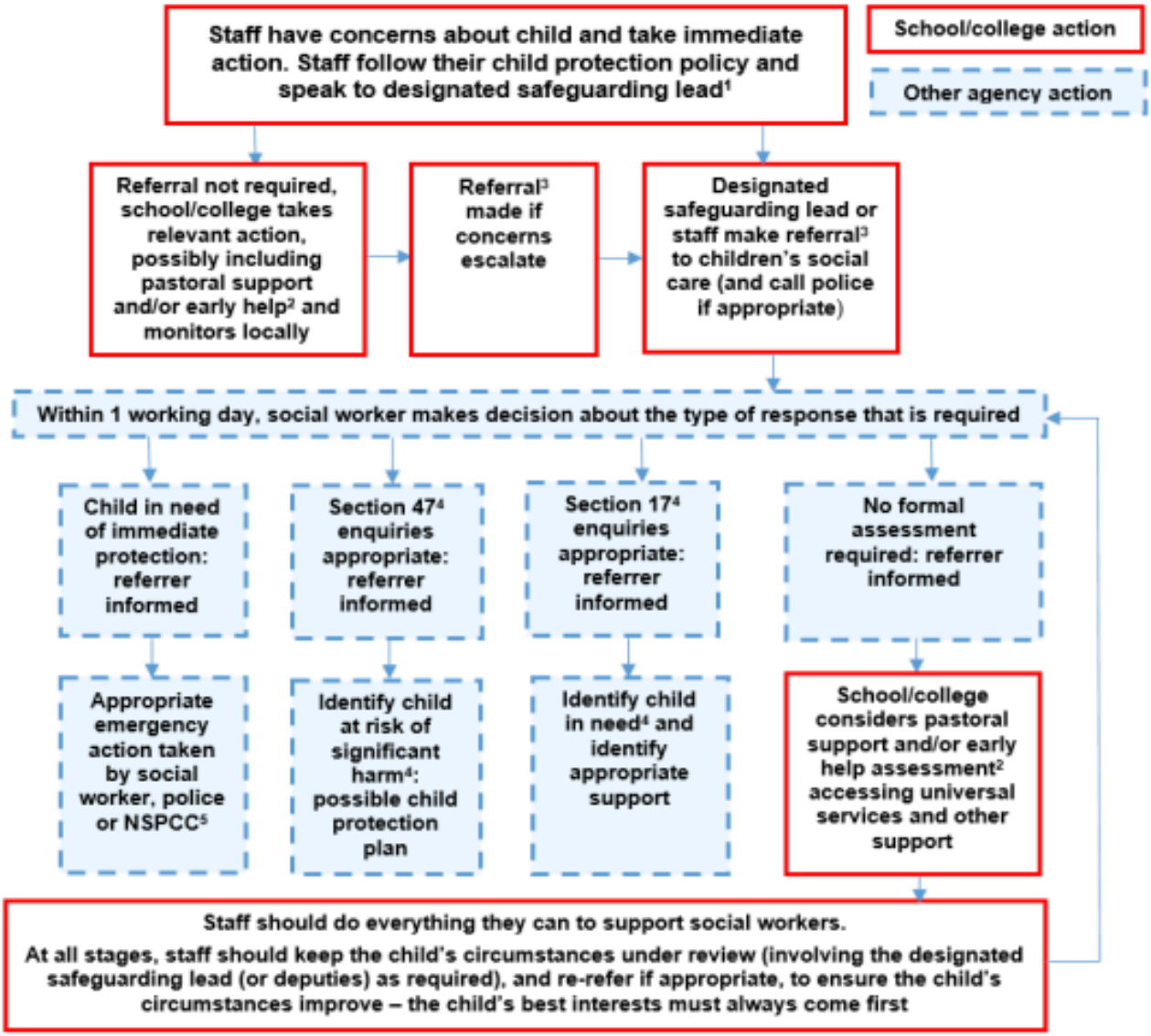
Once a child is born, neglect may involve a parent or carer failing to:

- 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)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Actions where there are concerns about a child

Figure 1: Flowchart setting out the actions taken where there are concerns about a child



[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

[2] Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the Family Help process.

[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.

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

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

Appendix 3: Specific Safeguarding Issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on part 1 of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk of becoming missing from education. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel

- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education

- Not taking part in education

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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

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

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

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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 children (this is sometimes known as ‘teenage relationship abuse’)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- 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 making or sharing of nudes and semi-nudes, including those generated using AI
- Upskirting, which is a criminal offence, 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
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or if a child makes a report to them, they will follow the procedures set out in section 11 of this policy, as appropriate. In particular, section 11.10 and 11.11 set out more detail about our school’s approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn’t physical, as well as witnessing the 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

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

Homelessness

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

The DSL and Deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

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

Section 11.4 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

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

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

The DSL will:

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

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs **Terrorism** is an action that:
- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system
- The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalization into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a student is being radicalized can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in section 11.6 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in our Prevent and Anti-Radicalisation Policy.

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- 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. 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. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

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 and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 11 of this policy, as appropriate.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation
- Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:
- Increased absence from school

- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))
- Risk factors which increase the likelihood of involvement in serious violence include:
- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence
- Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).
- If a member of staff has a concern about a student being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual student and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the student (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in using our InVentry system and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose will be asked to show photo ID and their DBS certificate if they are engaging in regulated activity.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

Missing students

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. Please see our Missing Student Procedure for further information.

Author / Reviewer:	Sam Cater (Assistant Head Safeguarding, DSL)
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Date of next review:	September 2027
Governor committees responsible for oversight:	Trinity School Committee and Welfare Sub-Committee