Purley Partnership Federation

Purley Nursery School
Achieving and growing together

Christ Church Primary School
Nurturing lifelong learners with God's guidance

Safeguarding Policy

Adapted from Croydon Policy September 2025 to be reviewed September 2026

September 2025

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Key contacts

School/college

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Designated safeguarding lead(s):
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Designated CLA teacher:
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Name of school: Purley Nursery School

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Designated CLA teacher:
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Nominated governor for safeguarding:
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London Borough of Croydon

Local Authority Designated Officer (LADO):

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schoolwhistleblowing@croydon.gov.uk

LADO: Jane Rowe
Email: jane.rowe@croydon.gov.uk
Tel: 0208 726 6000 (Ext. 84343) Mob: 07716092630

MASH (Multi-Agency Safeguarding Hub):

For child protection matters requiring discussion or immediate attention: Tel: 0208 255 2888 (9-5pm)

Out of Hours line: 0208 726 6000 (5pm-9am) / ssd-emergency-duty-team@croydon.gov.uk

MASH Service Manager: Phillip Larmond
Email: phillip.larmond@croydon.gov.uk

Croydon Safeguarding Children Partnership (CSCP)
Website: https://www.croydonsafeguarding.org/
Email: CSCP@croydon.gov.uk
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Core operational policies and procedures

Purpose and Aims of this policy

This is statutory guidance from the Department for Education (the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18 (KCSIE 2025). KCSIE also applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021

It is essential that **everybody** working in a school or college understands their safeguarding responsibilities and that no single person or agency will hold the full picture for a child/family. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play.

Aims

- Ensure safe recruitment practice in checking the suitability of all staff and volunteers to work with children including the completion of risk assessments.
- Ensure staff are appropriately trained.
- Raise awareness of safeguarding/child protection issues amongst all staff and volunteers and of what to do if they have concerns.
- Ensure that volunteers are appropriately supervised.
- Ensure that procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are resilient.
- Ensure that links with relevant agencies are effective including partnership working regarding child protection matters, including attendance at case conferences and core group meetings.
- Create and maintain a safe school environment where pupils feel secure and are encouraged to speak openly about any concerns they may have.
- Ensure pupils know there are trusted adults in the school who they can approach if they feel worried about anything.
- Ensure that the curriculum and related provisions including Health and Wellbeing/PSHE, support the development of pupils' skills to help them feel safe and adopt safe, responsible practices.
- Support for pupils who have been abused or may be at risk of harm in accordance with any agreed child protection plan.
- Ensure we respond appropriately to any concern or allegation about a member of staff or volunteer.
- Ensure staff follow accepted "safe practice" principles when working with pupils.
- Ensure pupils are protected from all forms of harm.

This policy should be considered alongside other relevant policies, for example, behaviour, SEND, code of practice, Whistleblowing, Safer Recruitment, Data protection, GDPR, and online safety.

PART 1 Safeguarding Information for ALL Staff

Induction and training

- The head teachers will ensure that all staff are fully inducted, are made aware of the following policies of the schools and that staff are fully aware of their role in implementing these:
    - Staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring and AI
    - Behaviour policy (including measures to prevent bullying including cyberbullying, prejudiced based and discriminatory bullying.)
    - Staff code of conduct including low-level concerns, allegations against staff and whistleblowing. It should also include the acceptable use of technology including mobile phones and pupil/staff relationships, communication including social media.
    - The safeguarding response to children who are absent from education, especially repeated absence or for long periods.
    - Role of the designated safeguarding lead and deputies

- Staff, including those not directly working with children, will be asked to confirm that they have received, read, and understood all relevant staff policies, including "*What to do if you are worried a child is being abused*" guidance and *'Keeping Children Safe in Education 2025 (part 1 page 17')*
- The designated safeguarding lead will ensure that all staff are fully inducted about the school's child protection procedures and that they receive safeguarding and child protection training on two yearly bases as a minimum. This will include online safety and AI.
- The headteachers will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
- School staff and governors will receive multi-agency safeguarding training at the level that is appropriate to their roles and responsibilities.
- As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive specific training on their role and other relevant multi-agency training courses.
- School staff will also receive training on Early Help and the MASH safeguarding referral process as part of their safeguarding training. They will understand what the services provide and how to access support through them. This will include also understand the difference between Section 17 (child in need) and Section 47 (suffering or likely to suffer significant harm).
- School/college staff will receive regular and timely updates on child protection and safeguarding concerns via the designated safeguarding lead in order to ensure they remain up to date with new legislation for example, via email, e-bulletins, and staff meetings.
- **All** staff should know the procedure if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- **All** staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. They should never be made to feel they are a problem or feel ashamed.

- **All staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

Safeguarding children

Safeguarding: is about every child

In relation to children and young people, safeguarding and promoting their welfare is defined in 'Working together to safeguard children' as:

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	promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children	taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

Early help cases

Staff will recognise children who may need additional support early on and take action to provide help, aiming to prevent issues from becoming more serious. They will pay particular attention to the needs of children in the following groups, whose circumstances may make them more likely to require early help:

Children with disabilities and additional needs, including those with special educational needs (whether they have an EHCP or not)	Young carers	If the child has a mental health need.
Children showing early signs of being drawn into anti-social or criminal behaviour, including youth violence and organised crime	Children who frequently go missing from home, school or care	Children who are misusing drugs or alcohol
Children at risk of criminal/sexual exploitation.	Children at risk of being radicalised or exploited	A family member in prison or is affected by parental offending
Misusing drugs or alcohol themselves	Children who have returned home from care	Children who show early signs of abuse or neglect, including where there are concerns about the cumulative effect of low-level neglect
Is at risk of 'so called' honour-based abuse, Female Genital Mutilation (FGM) or forced marriage	Is persistently absent from education	Privately fostered children
Child witnessing domestic abuse/violence	Parental offending	At Risk of being permanently excluded
Where the child's extra needs require services, consideration will be given to what early help support can be offered to a child by the school/college.		

- If the child requires an early help service from another agency, the school/college will make a referral to the Multi Agency Safeguarding Hub (MASH) for appropriate help and support. Staff will consult with parents *prior* to making any referral to discuss the matter and **gain consent** to refer to the child.
- Where the child is receiving an Early Help service, the school/college will work as part of the Team Around the Child/Family and take up the role of lead professional where this is appropriate.
- Early help provision should be monitored and reviewed to ensure the outcomes for the child are improving. If the school/college believes that this is not the case, consideration should be given to stepping the case up for statutory social care intervention.

Child Protection: is those at risk of significant harm.

The schools will carry out its duty to safeguard pupils which is:

protecting children from maltreatment	preventing impairment of children's health or development
ensuring children are growing up in circumstances consistent with the provision of safe and effective care	undertaking that role to enable children to have optimum life chances so they can enter adulthood successfully.

For a list of definitions and indicators of abuse and neglect, see appendix 1.
The Croydon Safeguarding Partnership threshold document can be found here Threshold ***.***

Action may be needed to protect children and learners from specific safeguarding issues such as:

Child abuse or neglect	Disguised compliance	Children missing from Education (CME)	Children who are home schooled (Hidden Children')	Preventing radicalisation/ The Prevent duty/ Channel	So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)
Child abduction and community safety incidents	Mental health concerns including self-harm and suicide	Bullying including on-line (cyber) bullying and prejudice-based bullying	Racism, disability, homophobic or transphobic abuse	Gender based violence/violence against women and girls	Domestic Abuse
Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)	Online safety	Substance misuse	Cybercrime	Modern Slavery and the National Referral Mechanism	County lines
Fabricated or induced illness	Faith abuse	Serious Youth Violence (including Child Criminal Exploitation: County Lines)	Private fostering	Sexting (Youth Produced Sexual Imagery)	Child-on-child abuse

Teenage relationship abuse	Serious Violence	Sexual violence and sexual harassment between children in schools and colleges	peer-on-peer sexual harassment/abuse	Children with family members in prison	Children and the court system
Homelessness	Adverse Childhood Experiences (ACEs)	Trauma and Attachment issues	Knife Crime		

The schools will seek advice from the MASH line to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for services. All referrals for a children's social care service or Early Help will be made by the MASH Portal. MASH Referral

Parental consent will normally be sought before making a referral. However, if there is concern that doing so may place the child or young person at further risk of harm—or if a member of the MASH (Multi-Agency Safeguarding Hub) team advises against it—consent may not be required. This applies in cases such as suspected sexual abuse, fabricated or induced illness, or where a parent is the alleged perpetrator. In such circumstances, a referral should proceed without parental consent.

Staff will also share relevant information and work collaboratively with other agencies to ensure a coordinated and effective response that supports the family and addresses the child's needs. The Online tool Report a child to your local council directs you to the local children's social care contact number.

Referral for statutory social work intervention

When there are concerns about a child's welfare, staff must act immediately by seeking advice from the Designated Safeguarding Lead or their deputy, who are likely to have the most comprehensive understanding of the child's safeguarding context.

Following consultation, the DSL will determine whether a referral to children's social care via the MASH is required. Children's social care assessments should consider harm occurring outside of the home, so it is essential that schools and colleges provide detailed and relevant information during the referral process. This supports a more comprehensive assessment and enables a contextual safeguarding approach to identify and address extra-familial risks: Contextual Safeguarding.

Where the referral raises concerns that the child is at risk of significant harm, the case will be triaged by Croydon's MASH team manager and allocated to a social worker to gather relevant information from other agencies to determine the outcome.

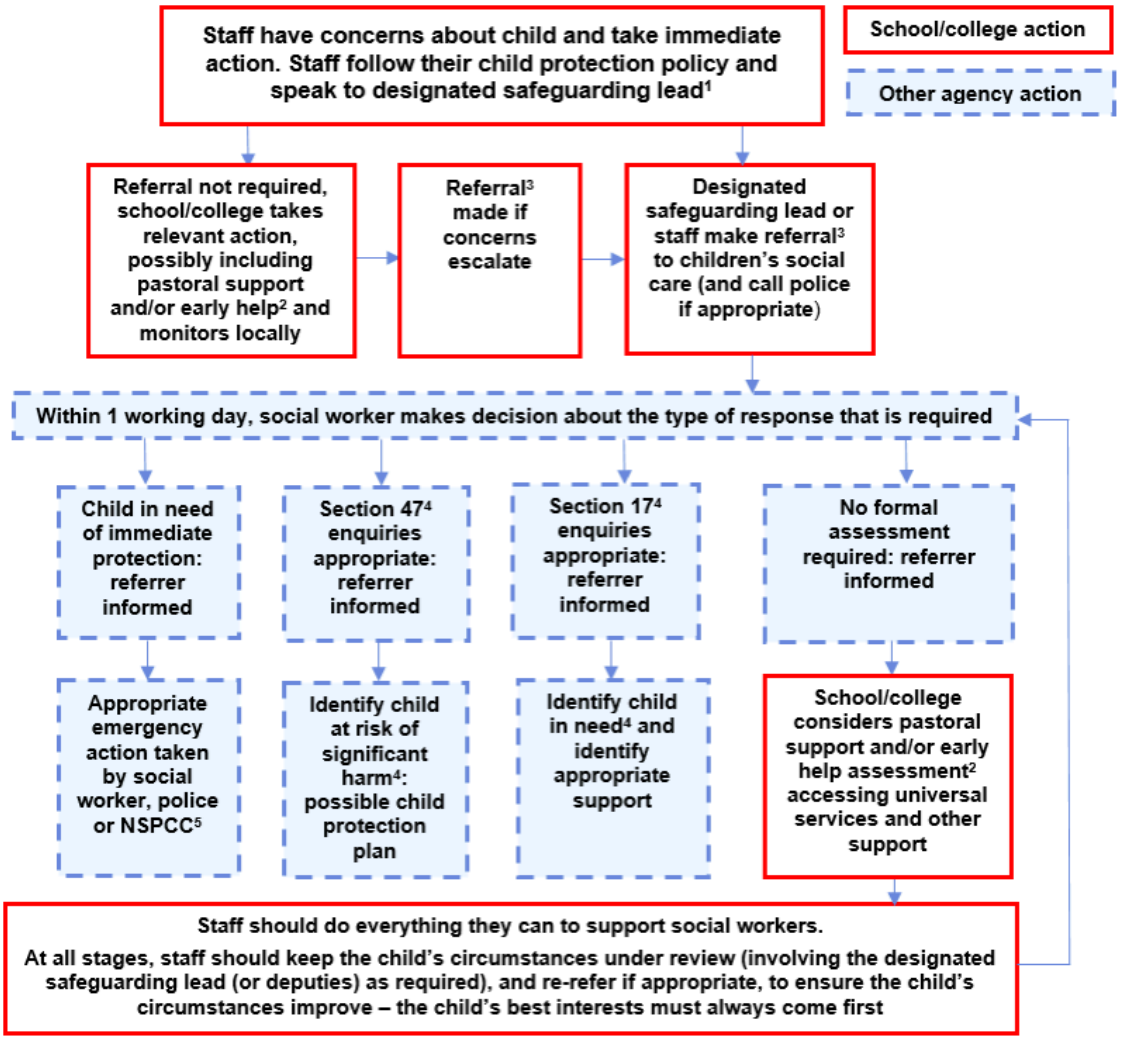
MASH will inform the schools of the outcome of any referral they make and what action children's social care will be taking. This may include any of the following:

- Child in Need (CIN) Assessment – Section 17, Children Act 1989, applied when the child is unlikely to achieve or maintain a reasonable standard of health or development without support (including children with disabilities). Children's Social Care undertakes a full assessment to coordinate services for the child/family.

- Child Protection (CP) Enquiry – Section 47, Children Act 1989, Initiated when there is reasonable cause to suspect the child is suffering, or is likely to suffer, significant harm, Strategy discussion and possible Child Protection Conference may follow, potentially lead to a Child Protection Plan.

- Providing interim services for the child and their family in the meantime whilst work is on-going (including details of appropriate services).

- Families may also be referred to Early help or signposted to universal services.



KCSIE 2025 P25

Children who need a Social Worker

Some children may have an allocated social worker due to concerns such as neglect, abuse, or complex family circumstances. These adverse experiences can increase their vulnerability to further harm. As safeguarding professionals, we have a legal and ethical duty to provide additional support and protection.
The local authority should ensure timely communication with the Designated Safeguarding Lead, so that schools and settings are aware when a child has a social worker.
This awareness enables staff to make informed decisions that prioritise the child's safety, wellbeing, and educational progress.

Child protection procedures

Role of school

The schools will work on the following policy documents in order to support the protection of pupils who are at risk of significant harm.

Working together to safeguard children *2023*
- Working together to safeguard children

What to do if you're worried a child is being abused *2015*
- What to do if you're worried a child is being abused - Publications - GOV.UK

The London Safeguarding Children Board child protection procedures
- London Safeguarding Children Board: Child Protection Procedures

Keeping children safe in education *2025*
- Keeping Children Safe in Education

Croydon Safeguarding Board local policies and procedures
- **www.croydonsafeguarding.org**

Other document links can be found within their relevant sections of this policy.

In line with these policies and procedures, the school/college will:
- Identify those pupils where there is child protection concerns and make a referral to MASH
- attend child protection case conferences to effectively share information about risk and harm
- contribute to the development and monitoring of child protection plans as a member of the core group
- carry out the school's role in implementing the child protection plan and continually monitoring the child's wellbeing and liaising with the allocated social worker as required.

Recognition

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the designated safeguarding lead.
- **Staff should refer to Annex B for abuse indicators** or page 11 onwards of KCSIE, that may suggest a pupil may be at risk of suffering significant harm.

- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputy and advice sought on what action should be taken. Where required, advice can be obtained from the MASH Line on a no-names basis.
- Concerns may be monitored over time and should be logged within an online management system.
- All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality.
- All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face.

Records

- All safeguarding monitoring records and Child protection records relating to pupils are highly confidential and will be kept in a designated file separate to the pupil's education records. These records will be securely held within the school/college by the DSL with linked access for relevant staff on a need-to-know basis.
- The designated safeguarding lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- All information should be recorded on the school's online management system or safeguarding monitoring/incident form (see annex 4) or similar and all records should be signed and dated.
- Records should show:
    - what the concerns were.
    - whether information of the concern was shared with the parent and what their response was.
    - Where relevant, what action was taken to refer on concerns or manage risk within the schools.
    - whether any follow-up action was taken.
    - how and why decisions were made.
    - Outcomes

- Any incidents, disclosures or signs of neglect or abuse should be fully recorded with dates, times and locations. Records should also include a note of what action was taken and the outcomes.

- The monitoring/incident records must be completed.
    - whenever concerns arise or there is a serious incident **or**
    - where a child is being monitored, prior to a case conference or core group meeting.

- When a child transitions to a new educational provision, the master file is passed to the designated safeguarding lead at the new school, transferred securely and confirmation of receipt obtained. Designated Leads should also consider if there is a need to share any key information about the family ahead of their start date. This may assist the new school in planning appropriate support for the family. Paper copies of safeguarding records sent from other schools will be scanned and added to the school's online management system

- A copy of child protection & safeguarding file should be retained by the school and kept in line with the school's information retention policy. Child protection & safeguarding records must be disposed of as confidential waste.

Dealing with disclosures

- Remain calm and listen carefully without showing shock, disbelief, or judgement. Accept what the child says without questioning its truth.

- Allow the child to speak freely, without interrupting or pressing for details.

- Offer reassurance but avoid making promises you may not be able to keep—especially around confidentiality. Let the child know that the information may need to be shared with others to help keep them safe.

- Reassure the child that they are not to blame and that they were right to speak up.

- Avoid asking leading or direct questions. Instead, allow the child to share their experience in their own words.

- Do not criticise or make negative comments about the alleged perpetrator.

- Explain clearly what will happen next, including who you will need to inform and why.

- Record the disclosure accurately and promptly and pass the information to the Designated Safeguarding Lead as soon as possible.

DO NOT DELAY

- Tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a lesson to do this.
- Early referral gives more time to offer help to the pupil and family before the situation becomes more serious.
- When the matter is already serious, early referral gives more time for others to protect the pupil.
- The Designated Safeguarding Lead may consult the MASH.

MAKE WRITTEN NOTES

- At the earliest opportunity make a written record of your concerns, these can then be added to your school's formal reporting system - record facts accurately and do not express opinion - these notes will help to ensure accuracy in recalling events later - notes should be legible, signed and dated/time.

- Do not take photographs of any physical injuries, record on a body map, do not use audio to record disclosures.
- Any original notes must be given to the Designated Safeguarding Lead as soon as possible and kept, even if you are using an online reporting system.

Referral

- Where possible, a decision on whether to refer a pupil to MASH should be made by the designated safeguarding lead or their deputy following a discussion with the member of staff who has raised concerns. However, this should not delay any referral, and *any* member of staff may make a referral if this is necessary, but staff should discuss the matter with a member of the senior management team and take advice from the MASH duty social worker. The designated safeguarding lead should be informed as soon as possible.

- Referrals should be completed using the MASH portal either by the teacher raising concerns or by the designated safeguarding lead. Urgent referrals will be accepted by telephone but must be confirmed in writing via the portal within 24 hours.

- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case on a “no names” basis with the MASH Line to obtain advice on how to proceed. Alternatively, advice can be sought from the LA Education Safeguarding Lead.

- Parental consent must be sought prior to the referral being made unless seeking consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.

- If the child already has an allocated social worker, the concern should be raised with the allocated social worker immediately, If the child is not already known to children’s social care, referrals should be made to MASH via the portal. If the child lives outside Croydon, a referral should be made to their local home authority.

- All referrals will be acknowledged by the MASH and the referrer informed of what action will be taken.

- If the schools do not think the child’s situation is improving within a reasonable timescale following referral, this should be taken up with children’s social care via the Mash line or schools can contact the LA education safeguarding lead to escalate.

Attendance at Case Conferences, Core Groups and Child in Need Meetings

- The designated safeguarding lead will liaise with children’s social care to ensure that all relevant information held by the school/college is provided to children’s social care during any child protection investigation.

- The designated safeguarding lead will ensure that the school/college is represented at child protection case conferences and core group meetings:
    - Where possible, a member of staff who knows the child best, such as a class teacher or head of year will be nominated to attend if they are unable to the designated safeguarding lead or their deputy will attend.
    - if no one from the schools can attend, the designated safeguarding leads will ensure that a report is made available for the conference or meeting.

Monitoring

Where a pupil is the subject of a child protection plan, and the school/college has been asked to monitor their attendance and welfare as part of this plan.

- Monitoring will be carried out by the relevant staff members in conjunction with the designated safeguarding lead.

- All information will be recorded on the child protection monitoring/incident form shown at appendix 2 or similar, prior to each conference and core group meeting. This will be saved onto the online system

- The completed monitoring form will be kept on the pupil's separate child protection file (that should be separate from the school record) and copies made available for all conferences and core group meetings.

- The designated safeguarding lead will notify the allocated social worker if the child is removed from school roll, suspended, permanently excluded or goes missing.

Confidentiality and Information Sharing

KCSIE 2025 tells us that The Data Protection act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or deputy). Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

Further information on information sharing can be found:

- **Chapter 1 – Working Together To Safeguard Children 2023 statutory guidance**
- **Information Sharing: Advice for Practitioners**
- **Information Commissioner's Office**
- **Data Protection Toolkit for Schools**

- Any information school or college staff learn about a pupil will be kept private and only shared with other professionals or agencies if the family agrees.

- For children under 12, parents or carers must give permission to share information.

- Young people aged 12 to 15 can give their own permission if they understand the situation well enough.

- Those aged 16 and 17 can also give their own consent if they are considered able to make that decision under the Mental Capacity Act. If not, permission should come from their parents.

- Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with children's social care and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools and colleges must share any information about the child requested by children's social care.

- Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made, and parents made aware of this. Before doing this, staff must weigh up whether sharing the information is more important than keeping it confidential. In serious cases, the duty to protect the child overrides the duty of confidentiality.

- Only relevant information should be disclosed, and only to those professionals who need to know. The information is confidential and only to be used for the stated purpose.

- If a child discloses neglect or abuse, staff must make it clear that they cannot promise confidentiality. They should explain that the information must be shared with the appropriate safeguarding professionals to ensure the child's safety, to whom and what will happen as a result. Parents should also be made aware of the school/college's duty to share information.

- Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated safeguarding lead or seek advice from the MASH line.

Working with Parents and Carers

The school/college recognises the vital role that parents and carers play in safeguarding and promoting the welfare of pupils. As part of our commitment to working in partnership with families, the school/college will:

- Clearly communicate its statutory safeguarding responsibilities by displaying a safeguarding statement on the homepage of the website and by making all relevant policies available online or upon request.

- Provide regular opportunities for parents and carers to discuss concerns with class teachers and appropriate members of staff.

- Involve parents and carers in the development and review of school/college policies, ensuring their views are considered.

- Maintain a clear and accessible complaints procedure for addressing concerns raised by parents and carers.

- Offer advice and direct families to appropriate services and resources when pupils require additional support please refer to the DFE guidance- Understanding and dealing with issues relating to parental responsibility

Multi-agency Working

- The schools are committed to working in partnership with relevant agencies to fulfil its statutory duties under Section 11 of the Children Act 2004 and in line with 'Working Together to Safeguard Children' (2023).

- The schools recognise their essential role in safeguarding children and will actively co-operate with the Croydon Safeguarding Children Partnership to support effective multi-agency working and improve outcomes for children and young people in Croydon.

Inspection

- Since September 2019 Ofsted's Inspection of schools, early years and post-16, inspectors will judge whether establishments are effective in their provision of safeguarding. Ofsted Education Inspection Framework(updated July 2023). Additional guidance for Early Years is available here.

Safeguarding Issues

The Law- KCSIE 2025 Pages 25-29 sets out legal requirements around safeguarding. These include
The Human Rights Act 1998
Equality Act 2010
Data Protection Act 2018

Child-on-Child abuse

Child-on-child abuse (also known as peer-on-peer abuse) refers to any form of physical, sexual, emotional, or verbal abuse, or coercive and harmful behaviour, inflicted by one child or young person onto another. This is most likely to include, but not limited to:

bullying (including cyberbullying, prejudice-based and discriminatory bullying)	Abuse in intimate personal relationships between children (also known as teenage relationship abuse)	sexual violence and sexual harassment	Initiation/hazing type violence and rituals
Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm o sexual violence and sexual harassment.	consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery):	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 (Voyeurism (Offences) Act 2019)	

There should be a zero-tolerance approach to abuse, and it should never be 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 and an unsafe environment for children (KCSIE 2025 Page 44 part 157)

Child on child sexual violence and harassment

Schools and colleges (including 6th forms) should respond to ***all*** reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and or online (what to look out for, and indicators of abuse are set out in Part one KCSIE 2025).

Sexual violence and sexual harassment may occur between children of any age and sex, from primary through to college age. Such incidents can involve a single child or a group of children targeting another individual or group. The school/college adopts a zero-tolerance approach to all forms of child-on-child sexual abuse, harassment, and violence.

All staff are expected to maintain a vigilant and proactive attitude, recognising that "**it could happen here."** Staff must respond to all concerns seriously and in line with the school's safeguarding procedures.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to-face (both physically and verbally) and are never acceptable (page 113 part 451 KCSIE 2025)

Sexual Violence

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003. Rape, assault by penetration, sexual assaults and causing someone to engage in sexual activity without their consent are crimes. *(Definitions of categories can be found on page 114 KCSIE 2025).* Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to MASH. Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same.

The designated safeguarding lead (or deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

Consent

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

The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.

- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Further information on consent can be found HERE.

Sexual Harassment

KCSIE 2025 tells us that when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Examples include:

- sexual comments
- sexual "jokes" , taunting and sexual stories
- Lewd comments
- Sexual remarks about clothes and appearance
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes.
- displaying pictures, photos or drawings of a sexual nature
- upskirting and
- online sexual harassment. Further examples can be found on page 115 KCSIE 2025

Harmful Sexual behaviour

This is where sexual behaviour ranges from developmentally 'normal' to inappropriate, problematic, abusive and violent. Harmful Sexual Behaviour HSB is widely used as an overarching term and can happen online or face-to-face. When considering HSB, both ages and the stages of development of the children are critical factors. Full details can be found in KCSIE 2025 Page 116

The definition of Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected too inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developing, inappropriate and may cause developmental damage. A useful umbrella term is harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face
and can also occur simultaneously between the two. HSB should be considered in a child protection context.
When considering HSB, both ages and the stages of development of the children are critical factors (page 116 paragraph 459).

Policy

- The schools recognise that sexual violence and sexual harassment between pupils is a serious safeguarding issue, and such behaviour will not be tolerated. School/college behaviour management and anti-bullying policies will reflect the school/college's approach

and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.

- The schools will follow the guidance within Part 5 of *KCSIE* as part of the school safeguarding procedures and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils.

- The schools will take all necessary steps to put in place a planned PHSE curriculum to convey the school's policy for preventing harmful sexual behaviour and to promote respectful behaviour between pupils with regards to sexual conduct. The school/college will also make close links to the new Relationships Education Curriculum this has since been which is compulsory for all schools from September 2020 updated July 2025.

- The schools will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the school/college and appropriate referrals made to the police and children's social care.

- The schools will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protect individual victims and safeguard the welfare of all pupils and staff.

- It should be noted that ALL reports of sexual harassment and violence should be taken seriously, but staff need to be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with additional needs are three times more likely to be abused. Procedures

- The schools will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

Procedures

- Not all children will directly tell a member of staff about their experience and staff need to know how to respond when overhearing a conversation or if they notice a change in the child's behaviour. Children who are victims of sexual violence and sexual harassment may find the experience distressing. stressful and distressing.

- The schools will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the KCSIE.

- Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

- Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the designated safeguarding lead, who will also carry out a risk assessment to look at any continued risk to the victim or other pupils and staff from the alleged perpetrator within the school/college environment. Toolkits that will support the risk assessment process include: Brook: traffic light tool.

- Where the allegation involves material posted online, the schools will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance Searching, screening and confiscation guidance and UKCIS Sexting in schools and colleges advice.

- The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable and informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

- When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider: the victim, especially their protection and support, the alleged perpetrator(s) and all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them.

- The members of staff and designated safeguarding lead will write up a record of the investigation that will set out how the school will respond to the incident.

- The designated safeguarding lead may take advice from MASH Line before making a decision. Possible outcomes include referral to Early Help Services, CSC, MASH, Learning Access and/or the police, or managing the matter internally under school/college behaviour policies.

- Where a referral will be made to children's social care or the police, the designated safeguarding lead will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents.

- KCSIE states that Schools and colleges should carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include: the wishes of the victim in terms of how they want to proceed. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children. the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour. the ages of the children involved. the developmental stages of the children involved. any power imbalance between the children. if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature). that sexual violence and sexual harassment can take place within intimate personal relationships between peers. are there ongoing risks to the victim, other children, adult students or school or college staff. and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

- The schools will take any necessary action to continue to safeguard the victim and other pupils within the schools' environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and children's social care investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.

- Where necessary and appropriate, the schools will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf.

- Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that children will "take sides" following a report and the school/college will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment. The school/college will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

- The National Organisation for the Treatment of Abusers (NOTA) provides support for professionals involved in work with, or related to, sexual offending.

- Schools will consult with Part 5 KCSIE 2025 (specifically pages113-117) when managing allegations of child-on-child sexual harassment or sexual violence. School/college will consider the 4 likely scenarios when managing reports of incidents
    - Manage internally
    - Early Help
    - Referral to Children's Social Care
    - Report to Police

- Risk assessing (4840), safeguarding and supporting victims (535), Safeguarding and supporting the alleged perpetrator (545), disciplining alleged perpetrators (550) and safeguarding other children (557), can all be advised through the relevant paragraphs in KCSIE 2025.

- Schools will refer to paragraphs 532-534 with regards to unsubstantiated, unfounded, false or malicious reports and fully follow the recommendations/guidance of recording information and what to do when the report if found to be unsubstantiated, unfounded, false or malicious.

What to do if you are informed that a parent is on the sex offenders register

In this situation the head teacherswill be guided by parole conditions where relevant to keep children safe in school. This information must be treated as strictly confidential and will only be shared with the Designated Safeguarding Lead if appropriate.

Additional procedures and Summary

Sexual violence is defined as any act which is an offence under the Sexual Offences Act 2003, including rape, assault by penetration or sexual assault without the consent of the victim.
Sexual harassment is defined as unwanted sexual conduct likely to violate the victim's dignity and/or make them feel intimidated, degraded or humiliated or create a hostile, offensive or sexualised environment. This includes making sexual comments or jokes, physical contact such as touching or interfering with clothing or displaying sexual images. It also includes online harassment.
When dealing with incidents, the school will ensure that the written report of the incident contains objective facts and sets out clearly the next steps to be taken, with the views of the victim clearly recorded.
The school will be aware of their equality duty as victims of sexual violence and harassment are more likely to be female but should follow the same procedures and ensure the same level of response for incidents involving male pupils or incidents where victim and perpetrator are the same sex.
Cases may be managed internally by the school under without referral to other agencies where the incident involves low-level concerns and is a "one-off" occurrence where there is no further risk to the victim or other pupils.
The school will give careful thought to the day to day management of risk and support for the victim, taking into account the victim's views when considering practical issues such as separating the victim and perpetrator. The school will justify any measures taken and that they do not interfere with the educational opportunities of either party.
The school will ensure that staff and governors are able to take up training and support around relationships and child-on-child abuse and how these messages should be delivered within the PSHE curriculum. Sexual violence and harassment will also be addressed in general, whole-school safeguarding training delivered by the CSCB, with designated safeguarding leads receiving more intense training in view of their role.

Contextual (Extra Familial) safeguarding for young people.

The schools are aware that as young people grow more independent, they may face more risk from safeguarding threats from outside of the home, either from within the community, at school/college or from their own peer group. Protecting children from these external risks is known as contextual safeguarding. School safeguarding policies must therefore reflect the needs of young people in their own communities. (Please see the school's annex to this policy). Schools/colleges act as a protective factor in children's lives. Children who do not attend can become *hidden*, which means that schools/colleges are less able to help and protect them. Children who do not attend school may be at further risk of not achieving their educational potential. This could include the following groups.

- Children not attending school nor on a school roll, including children who have been excluded both on a permanent or an informal basis and for whom no suitable alternative provision is arranged.

- Children who fall under the heading ‘educated at home’, but may not be receiving effective, efficient and suitable education or any education. This includes some children who may not be known to their local authority (LA) or any agencies.

- Children attending unregistered schools, sometimes under the guise of being electively home educated.

- Children in alternative provision that is of insufficient quality or is not provided for the required hours.

- Children without a school place in LAs in which the protocols are not working well enough for hard-to-place children.

KCSIE 2025 paragraph 29 states: All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

Children who run away/go missing

Children who run away or go missing from home or care are vulnerable to criminal and/or sexual exploitation. If a school becomes aware of a child who is missing from home or care and that child has not been reported missing to the police, they should do so using 101.
Running away may be an indicator of other problems and therefore a referral to MASH should be considered. Early intervention after the first episode may prevent a child being exploited.
Children who run away or go missing from home or care

Child criminal exploitation – County lines Pg15

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of **county lines criminal activity**: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets and seaside towns. Those involved with county lines will often go missing for a few days at a time. Children and young people involved in county lines may be considered as having been trafficked and be victims of criminal exploitation.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years.
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement –based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females and young people or adults.
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.
If you become aware of a child or young person who may be at risk a referral should be made to MASH.

Safeguarding children who may have been trafficked
Criminal Exploitation of children and vulnerable adults: County Lines guidance

Children at risk of Sexual Exploitation (CSE)

Both Child Criminal Exploitation and Child sexual exploitation is a form of abuse that occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 in sexual or criminal activity in exchange for something the victim needs or wants, and/or b) for financial advantage or increased status of the perpetrator or facilitator. This abuse can occur with male or female, adults or children and can be a one-off event or a series. Criminal and sexual exploitation of females can present differently in girls to boys as well as potential indicators.

The three main types of child sexual exploitation:
The victim may have been sexually exploited even if sexual activity appears consensual. Child sexual exploitation does not always involve physical contact. it can also occur through the use of technology.

Inappropriate relationships
- Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

Boyfriend/Girlfriend
- Abusers groom a victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

Organised exploitation and trafficking
- Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Indicators of child sexual exploitation may include:
- Acquisition of money, clothes, mobile phones, etc. without plausible explanation.
- Gang-association and/or isolation from peers/social networks.
- Suspension, exclusion, or unexplained absences from school, college or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.

- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours. and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Sexual identity

If a school becomes aware of a child that may be being sexually exploited they should refer to MASH.
Child sexual exploitation – DfE guidance

Serious Violent Crime - people at risk from gang activity or serious youth violence

Schools/colleges are a source of safety and security for many young people. Staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime. Schools and colleges play a vital role in providing safety, stability, and support for young people. Promoting resilience and increasing awareness of the risks linked to gang involvement and serious youth violence are essential steps in helping to protect young people within their communities.
Staff must remain vigilant and be able to recognize the signs and indicators that a child may be at risk of, or involved in, serious violent crime.
These may include:

- Increased absence from school/college
- Change in friendships and groups
- Relationships with older individuals or groups
- Significant decline in educational interest and/or performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions

These may indicate involvement or approach by criminal networks or gangs.

More risk factors can be found in the Serious Violence Strategy

Schools/colleges need to be alert to the possibility of children and young people bringing weapons onto site. There are various reasons why young people may be carrying a weapon. These should be explored with the young person.
Under Croydon's weapons in schools protocol the police must be informed via 101 of any pupil found in possession or a weapon in school or any weapon that is found on the school site.
Preventing youth violence and gang involvement KCSIE annex B

Domestic abuse and/or sexual violence

Exposure to domestic abuse can have a significant impact on children's emotional development and mental health. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognizes the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse includes:

- Intimate partner violence
- Abuse by family members
- Teenage relationship abuse
- Child to parent abuse

Operation Encompass

Croydon is part of the Operation Encompass service which operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. (KCSIE 2025)
Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available from 8:00 to 13:00, Monday to Friday on 0204 513

9990 (charged at local rate).

National Domestic Abuse Helpline - Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247; the website also provides guidance and support for potential victims, loved ones and friends that you may be worried about, a form is provided for a safe call back time. .
Schools should refer young people who are victims of domestic or sexual violence to MASH. Further advice and guidance can be obtained from FJS, formerly known as FJC or the Family Justice serviceCentre, who can be contacted by phoning their helpline of 0208 688 0100 or by emailing fjs@croydon.gov.uk

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:
• NSPCC- UK domestic-abuse Signs Symptoms Effects • Refuge what is domestic violence/effects of domestic violence on children
• Safelives: young people and domestic abuse.
• Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
• Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children)
Specific guidance on adolescent to parent violence and abuse is published by the VRU the Home Office
Adolescent to parent violence and abuse (APVA)

https://www.london.gov.uk/sites/default/files/comprehensive_needs_assessment_of_child-adolescent_to_parent_violence_and_abuse_in_london.pdf

Prevention of Radicalisation and Extremism

Radicalisation- is the process of a person legitimizing support for, or use of, terrorist violence.
Extremism- is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
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 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. KCSIE 2025 page 157

The school/college's safeguarding duty includes the duty to promote British values to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism.
Promoting fundamental British values as part of SMSC in schools
Under section 26 of the Counterterrorism and Security Act 2015, the school/college also has a duty to refer young people on to Croydon's Channel Panel under the Prevent strategy where there are concerns that they are being radicalised.

The Prevent duty

Where a school/college has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a younger pupil may be at risk due to their parent's radicalisation, the school/college should make a referral to MASH using the MASH Referral Form.

Risk indicators of vulnerable pupils

Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

Indicators of a personal crisis include the following:

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

Indicators of vulnerability through personal circumstances include the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality
- Experiences of dealing with the police
- Involvement with criminal groups

Critical indicators include where the pupil is:

- In contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Making significant changes to their appearance and/or behaviour

When making a judgement, staff may consider the following questions:

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities?
- Has the pupil witnessed or become the victim of racial or religious hate crimes?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Is there a pattern of regular or extended travel within the UK?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?

- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?
- Is the pupil the victim of social isolation?

More detailed risk factors using the - Radicalisation Risk Indicators

Educate against Hate - A website launched by Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British Values) to help recognise and address extremism and radicalisation in young people.

Channel -This programme is designed to provide early intervention support to individuals identified as being vulnerable to radicalisation or involvement in terrorism. It offers a clear referral mechanism for schools and educational institutions to raise concerns where there is a belief that an individual may be at risk. Participation in the programme is entirely voluntary and remains so throughout all stages of engagement.

Schools should always be a safe space for young people to explore new ideas and perspectives and develop their critical thinking skills. Where there are concerns about radicalisation and a referral to Channel Panel is being considered the school/college should discuss these concerns internally and consider external advice and guidance where necessary and appropriate.

The school's safeguarding lead should be consulted for internal advice on making a referral. Prior to making a referral the school may also speak to and get advice from their police schools' officer (if they have one). The MASH line and/or Croydon's Prevent manager (Haydar Muntadhar: email haydar.muntadhar@croydon.gov.uk. tel. 0208 726 6000 (ext. 28579)

Honor based abuse (HBA)

So-called 'honor-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation FGM (mentioned above), forced marriage, and practices such as breast ironing.

Female Genital Mutilation (FGM) mandatory reporting

Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. FGM is a criminal offence in the UK. While it can occur at any age from birth to around 15 years old, the majority of cases are believed to take place between the ages of five and eight. Teachers have a specific legal duty to report known cases of FGM to the police (Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015).

Risk factors for FGM include:

low level of integration into UK society	mother or a sister who has undergone FGM	girls who are withdrawn from PSHE
visiting female elder from the country of origin	being taken on a long holiday to the country of origin	talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The school/college will follow the statutory guidance on FGM to safeguard girls who are at risk: Multi-agency statutory guidance on female genital mutilation/ FGM Resource Pack

Where a pupil makes a disclosure of FGM, the school/college will follow the mandatory reporting process and make appropriate referrals to the police and MASH.

Breast Ironing

This is a practice in some African countries, notably Cameroon. Girls aged between nine and 15 have hot pestles, stones or other implements rubbed on their developing breasts to stop them growing further. Breast Ironing is usually carried out by mothers or other women to protect girls from men. It is believed that the reason they carry out this procedure is to reduce the risk of sexual harassment, rape, kidnap and forced marriage. Indicators that Breast Ironing has been carried out are chest pains or other discomfort, changes in behaviour and fear of undressing.

Forced Marriage

If a school becomes aware of a child that may be at risk of a forced marriage they should, in the first instance, refer to MASH. If a child is at immediate risk, they should contact the police- Forced marriage - FCO Guidance

Further advice on forced marriage can be obtained from the Foreign and Commonwealth Office's Forced Marriage Unit Telephone (Office Hours: Mon–Fri, 09:00–17:00) 020 7008 0151, Out-of-Hours / Emergency Contact- 020 7008 1500 and Email- fmu@fcdo.gov.uk

All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Modern Day Slavery and the National Referral Mechanism

Modern slavery includes human trafficking, slavery, servitude, and forced or compulsory labour. Individuals may be exploited in a variety of ways, such as through sexual exploitation, forced labour, domestic servitude, forced criminal activity, or the removal of organs. Detailed guidance on recognising the signs of modern slavery, the support available to victims, and how to refer individuals to the National Referral Mechanism (NRM) can be found in the Modern Slavery Statutory Guidance- Modern slavery how to identify and support-victims

Children Requiring Mental Health Support

Schools and Colleges play a key role in supporting the emotional health and well-being of pupils. In some cases, mental health can be an indicator of abuse, and all provisions should have clear procedures on how to access the appropriate support for these children.

More information can be found in the mental health and behaviour in schools guidance , colleges may also wish to follow this guidance as best practice.
Croydon CAMHS Service- Croydon CAMHS child wellbeing practitioner team

Online Safety

As part of their duty to provide a safe learning environment and schools should ensure their pupils know how to remain safe online. There is considerable risk to children online, but they can be categorised within these four areas as stated within KCSIE 2025-page 39 part 134:

Content:

- Being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact:

- Being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct:

- Online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.

Commerce:

- Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group- https://apwg.org/.

The DfE published Teaching Online Safety in Schools identifying the importance of including reporting and acting on online safety concerns within the Child Protection Policy, school behaviour policy and bullying policy. Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. Pupils should be just as clear about what is expected of them online as offline.

A recommended framework published by UK Council for Child Internet Safety (UKCCIS) supports the delivery of online safety. Educated for a Connected World.

Educating children and young people to stay safe online is crucial in the modern world. Other websites that can assist are:
Be internet legends
Disrespect Nobody
PSHE Association
ThinkUKnow
Safer Internet centre

360 Safe Website has a free online self-assessment tool for schools.

Please also refer to page 165 KCSIE 2025 for more online safety resources.

Remote Education

Where children are receiving online education at home, the Department for Education has issued guidance to help schools and colleges ensure this is carried out safely. This includes advice on safeguarding in schools, colleges and other providers, as well as specific guidance on safeguarding during remote education.
Safeguarding and Remote Education
Providing Remote Education Guidance for Schools

Filtering and Monitoring

Paragraph 140 in KCSIE states 'Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks'.
The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

Schools and colleges will adhere to the DfE Filtering and Monitoring Standards in order to fulfil their duties.

The schools will:

- Designate and document specific roles and responsibilities for the implementation and oversight of filtering and monitoring systems.
- Conduct a formal review of filtering and monitoring provisions at least once every year to ensure ongoing effectiveness and relevance.

- Ensure harmful or inappropriate content is effectively blocked, while maintaining reasonable access to online resources necessary for teaching and learning.
- Implement robust and appropriate monitoring strategies that align with the organisation's safeguarding requirements.

Schools can use the Plan Technology For your School to self- assess against the filtering and monitoring standards and receive personalised recommendations on how to meet requirements for your school.

Further guidance on filtering and monitoring can be found at:

- UK Safer Internet Centre - Appropriate Filtering and Monitoring
- South West Grid for Learning - has created a TOOL to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).
- The Department has published Generative AI: Generative AI Product Safety Expectations generative artificial intelligence safely and explains how filtering and monitoring requirements apply to the use of generative AI in education.

Reviewing online Safety

Given the fast-paced evolution of technology and the associated risks, schools and colleges must remain vigilant and responsive to emerging online threats. This includes conducting regular evaluations such as an annual review of their online safety strategies. These reviews should be informed by an up-to-date risk assessment that reflects the current risks online faced by children.

Paragraph 146 in KCSIE states: UKCIS has published Online safety in schools and colleges: Questions from the governing board. The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.

Cybercrime

Cybercrime refers to criminal activities carried out using computers and/or the internet. It is generally categorised into two types:
Cyber-enabled crimes – traditional crimes that can occur offline but are significantly amplified in scale or impact by digital technology.
Cyber-dependent crimes – offences that can only be committed using computer technology and networks.

Examples of cyber-dependent crimes include:

- Unauthorised access to computer systems (illegal hacking): For example, gaining access to a school's network to obtain exam answers or alter academic records.

- Denial of Service (DoS) or Distributed Denial of Service (DDoS) attacks: Attempts to disrupt the normal functioning of a computer system, network, or website by overwhelming it with traffic from multiple sources.
- Creation, distribution, or use of malware: This includes malicious software such as viruses, spyware, ransomware, botnets, or Remote Access Trojans, often with the intent to commit further offences.

Children and young people with advanced computing skills and interests may unintentionally or deliberately become involved in cyber-dependent criminal activity. It is important to provide appropriate guidance, education, and support to help them use their skills responsibly and legally.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyberchoices Programme . This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local police. It aims to intervene where young people are at risk of committing, or being drawn into, low-level, cyber-dependent offences and divert them to a more positive use of their skills and interests.

Looked after Children and Previously Looked After Children and Care Leavers

The school/college acknowledges that looked after children, previously looked after children, and care leavers may be particularly vulnerable due to their care status and the experiences they may have encountered prior to entering care.

The school/college's designated teacher for CLA and care leavers has specialist knowledge of the issues faced by this cohort and for this reason, the designated safeguarding lead will consult with the designated teacher to seek advice whenever there are concerns about the welfare of a looked after child/young person or previously looked after child/Yp or care leaver.

The Virtual School Head is the designated lead officer responsible for ensuring that effective arrangements are in place to enhance the educational experiences and outcomes of looked-after children under the care of the local authority, including those placed in settings outside the authority's area.
As of September 2025, the role of Virtual School Heads was further extended to include a non-statutory responsibility to promote the educational achievement of all children in kinship care. Non-statutory guidance on Promoting the education of children with a social worker and children in kinship care arrangements contains further information on the roles and responsibilities of Virtual School Heads.

More information about supporting children who are looked after in achieving their potential can be found in:
Promoting the Education of Looked after Children
Promoting the Education of Children with a social worker and children in kinship care arrangements

Additional procedures
Schools are aware of the new duty to promote the education of previously looked after children. These are defined as children who have left the care system as a result of adoption or special guardianship order. It is recognised that these children may face the same difficulties and have the same vulnerabilities as looked after children. Schools and colleges should also consider the potential vulnerability of relevant children.

Children who are lesbian, gay, bisexual, or gender questioning

Children being Lesbian, gay or bisexual is not a safeguarding concern, but it is important to be aware that sometimes they can be targeted by other children; this can increase their vulnerability.

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

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

Schools and colleges need to be aware when supporting a gender questioning child, to take a cautious approach and consider the broad range of their individual needs, together with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can occur when children feel they do not have trusted adult/s to express how they feel. It is vital that staff reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Lesbian, Gay, Bisexual and transgender content July 2025 is part of Relationships Education and Relationships and Sex Education curriculum. There is a range of support available to help schools address homophobic, biphobic and transphobic bullying and abuse.

Children with Special Education Needs and Disabilities or health issues

Schools are aware that children with special educational needs, certain medical/physical health issues may face increased risks of harm and abuse online and offline.

Schools are aware that barriers can exist when recognising abuse, neglect and exploitation in children with SEND/ health issues and this is reflected in their child protection policy. These include:

There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.

- Children with SEND and health issues can be disproportionally impacted by things like bullying without outwardly showing any signs.
- Communication barriers and difficulties in managing/reporting these challenges

- Potential risk of peer group isolation
- Cognitive understanding being able to understand what fact and fiction within online content is and then repeating this content at school or college without knowledge of the consequences of this.

Reports of abuse involving children with SEND needs close liaison with the DSL and SENCO, extra pastoral support should be considered for SEND children as well as appropriate communication.

For your information- Paragraph 205 removal of 'spectrum' and 'disorder' to align with SEND code of practice.

Further information can be found below:
• SEND Code of Practice 0 to 25 years
• Supporting Pupils at School with Medical Conditions.

Further information from Specialist Organisations:

The Croydon Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offers information, advice and support for parents and carers of children and young people with SEND.
NSPCC- Safeguarding Children with Special Educational Needs and Disabilities and Safeguarding Child Protection-deaf and disabled children risk and vulnerability factors

Private Fostering – LA Notification

Private fostering relates to children who are under the age of 16, or under the age of 18 if it is a child with a disability. It is an arrangement where a child is cared for by an adult who is not a close relative. The arrangement must be made by the parents and has to be in place for 28 days or more or be expected to be in place for 28 days or more.
Schools have a legal duty to notify Croydon of any pupils they know to be privately fostered. The DSL should make a MASH referral if any private fostering arrangements come to their notice.

Children staying with host families (homestay)

Schools and colleges often can make arrangements for their pupils to be part of exchange visits to other parts of the UK or abroad.
Annex D page 177-179 of KCSIE 2025 has further clarification around this.

Young Carers

If schools have concerns about a pupil, they believe to be a young carer, they can contact the Young Carers Service on 0208 649 9339.
Further details can be found on their website – Croydon Young Carers

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL should be aware of how to refer/contact housing to raise/escalate concerns as soon as possible (see Annex 5). Indicators that a family may be at risk of homelessness include household

debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being evicted from a property.
The Homelessness Reduction Act 2017 places a new legal duty on English councils. Everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live- homelessness Reduction bill policy factsheets

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed and there are two age appropriate guides to support children.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched Making child arrangements if you divorce or separate, this may be useful for parents and carers.

Procedure for non-collection of pupils (primary schools only)

The school will put in place a policy regarding handing over children to adults who are not their parent or known carer at the end of the school day. Parents will be asked to provide details of the person who will normally collect the child and will be informed of the need to notify the school in advance if this changes, giving details of the person authorised to collect the child. The school will also ensure that the details of at least two people who can be contacted in an emergency in the event that the child is uncollected.

Parents will also be asked to inform schools where children are subject to court orders that limit contact with a named individual.

If anyone who is not authorised to do so attempts to collect the child, the school will not allow the child to leave and contact the parent immediately.

If a child is uncollected at the end of the school day, the school will follow the procedure agreed with children's social care:

- The schools will check with the child to see if there are any changes to arrangements for collection and try to contact the parents or other family members and wait with the child until someone comes to collect them.

- Children will not be released into the care of another parent even when they offer to take the child home.

- The school will contact the MASH line by 4.00pm if there are difficulties in contacting parents or other family members.

- If all possible means of contact have been exhausted and no contact can be made with the parents by 5pm, the school will contact the EDT team via phone and follow up with an email and if advised to do so the police, who will arrange to collect the child or make arrangements for the child to be transported to the children's social services office.

- The school will regularly ask parents to confirm and update contact details and to nominate a family member or friend who can collect the child if they are unable to do so.

- Where children are regularly uncollected or collected late, this should be discussed with the DSL If there are also child protection concerns, a referral should be made to children's social care via MASH.

Children who are absent from education

Prolonged or repeated absence from education can be an important indicator of safeguarding concerns, including neglect, child sexual exploitation, and child criminal exploitation—particularly in relation to county lines. The school's approach to managing persistent absence and children missing from education is designed to support the early identification of such risks.

Our response aims not only to address patterns of absence but also to prevent children from becoming missing from education in the future. This applies both when concerns are just beginning to emerge, and where children are already known to local authorities about children's social care—such as those with a social worker, children in need, those on child protection plans, or looked-after children. In such cases, absence from education can heighten existing safeguarding risks within the home or wider community.

- The department's statutory guidance on school attendance Working together to improve school attendance .
- Information regarding 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, can be found in the department's statutory guidance: Children Missing Education.
- Further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges.
- General information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy.
- LA(Croydon) CME Policy- Croydon Children Missing From Education Policy

Elective Home Education (EHE)

While many children who are educated at home receive high-quality and positive learning experience, it is expected that the decision to home educate is made with the child's best educational interests at its core.
However, this is not always the case. In some instances, elective home education can result in children becoming less visible to the professionals and services responsible for safeguarding and supporting them. This reduced visibility may increase the risk of unmet needs or safeguarding concerns going unnoticed.

The school will work in partnership with local authorities and other agencies to ensure that any decisions around elective home education are carefully considered, and that the welfare of the child remains a central focus

In accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, a school must make a return to the local authority when a pupil's name is deleted from the admission register.

Where a parent or carer expresses an intention to remove their child from school to pursue elective home education (EHE), it is recommended that the school, local authority, and relevant professionals work together to coordinate a meeting with the parents/carers wherever possible. Ideally, this meeting should take place before a final decision is made, to ensure that the implications have been fully considered and that the decision reflects the best interests of the child. This is particularly important in cases where the child is known to be vulnerable, has special educational needs and/or disabilities (SEND), or has an allocated social worker.
Schools should be familiar with the Elective Home Education guidance. While this guidance is primarily directed at local authorities, it outlines key responsibilities and powers in relation to EHE that are also relevant to schools when engaging with families considering this route.

Opportunities to teach Safeguarding

The Governing body should ensure the school provides opportunities for children to learn about how to keep themselves safe Including online; these must be age appropriate and cater to individuals with specific needs.

General safeguarding themes are addressed across the school's broad and balanced curriculum. However, more specific or sensitive issues relevant to our school community are taught through statutory Relationships Education (for all primary pupils), Relationships and Sex Education (for all secondary pupils), and Health Education (for all pupils in state-funded schools), which became compulsory in September 2020.

Schools and colleges play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The school/college will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life. (Part 130 pg37)

The department has produced a one-stop hub for teachers which can be accessed here: Teaching About Relationships Sex and Health This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

Please see Annex 5 for resources to help schools and colleges understand and teach safeguarding.

The Child's Wishes

The best interests of the child must remain central to all safeguarding decisions. The Governing Body and school or college leaders are responsible for ensuring that the child's wishes and

feelings are actively considered when planning support and determining the appropriate course of action.

Other relevant safeguarding guidance

Schools can access additional guidance, policies and procedures at:
Education Toolkit
DfE Alternative Provision guidance
DfE School Attendance Parental Responsibility Measures guidance
DfE Behaviour in Schools guidance
DfE Preventing and Tackling Bullying guidance
DfE Children Missing Education guidance
DfE and ACPO Drug Advice for School guidance
DfE Advice for Schools on Equality Act 2010
DfE Supporting pupils at school with medical conditions
DfE Guidance on First Aid for Schools
DfE Mental health and behaviour in schools
DfE Use of reasonable force guidance
DfE Promoting fundamental British values as part of SMSC in Schools
DfE Children who run away or go missing from home or care
Child sexual exploitation – DfE guidance
Preventing youth violence and gang involvement
Safeguarding children who may have been trafficked
Criminal Exploitation of children and vulnerable adults: County Lines guidance
Preventing and tackling Bullying
Promoting children and young people's emotional health and wellbeing
Rise Above
Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, parents and carers
Domestic Abuse: Various information/Guidance
Faith Based Abuse
Homelessness: how local authorities should exercise their functions
Private Fostering
Upskirting: know your rights

Part 2- Responsibility of Governors, Proprietors and Management

Legislation and the Law which Governing Bodies and proprietors adhere to can be found on pages 25-29 KCSIE 2025.

Croydon's Children Families & Education Directorate

The Directorate includes services that will support the school/college to safeguard and promote the welfare of pupils by:

- Coordinating the delivery of integrated children's services within the borough, including an early help service.
- Providing statutory social services under the Children Act 1989/2004.
- Providing the school/college with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and online safety.
- Dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- Taking responsibility for those children who are not in education, including children who are known to be home educated.

Governing Board

The term 'governors' and 'governing board' is used throughout to refer to whoever is responsible for fulfilling governance functions. This could be the governors of a maintained school, the trustees of a single or multi-academy trust, or the local governing board to the function in question that has been delegated within a multi-academy trust.
The Governing Board will ensure that the schools meets their statutory duties about safeguarding and protecting pupils and that the following are in place:

- The schools have the following policies in place and these are regularly monitored, reviewed and updated where necessary:
    - safeguarding policies and procedures covering early help and child protection that are consistent with Croydon Safeguarding Children Board procedures and Croydon's internal policies
    - a staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media
    - a procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.

- The school can work jointly with other agencies in order to ensure pupils can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.

- A member of staff is appointed as the Designated Manager to address allegations against school staff

- The Chair of the Governing Board is aware that they are responsible for liaising with the LADO in the event of an allegation against the head teacher.

- A senior member of staff is appointed as the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities and that another member of staff is appointed to deputise in their absence.

- There is a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role.

- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection polices and the staff code of conduct policy.

- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the schools and there are robust whistleblowing procedures in place.

- Steps are taken to ensure parents and pupils are aware of the school/college's safeguarding and child protection policies and procedures.

- Governors ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including online.

- The schools have appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.

- At least one member of the Governing Board has undertaken accredited safer recruitment training.

- There is a nominated member of the Governing Board who is responsible for Safeguarding and holds school accountable for their statutory duties.

- All staff receive safeguarding and child protection training every year and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new

legislation. Safeguarding training is available for all Croydon schools via the https://www.croydonsafeguarding.org/safeguarding-training

- The schools have procedures in place to deal with allegations made against other pupils.

- Children's wishes and feelings are considered when deciding on what action to take or services to provide to protect individual children and there is a robust system in place for gaining feedback from pupils.

Schools- Headteachers and Principals

The head teacher/principal will ensure that the school/college meets its statutory safeguarding duty by ensuring the following:

- Staff are inducted thoroughly and have read all the schools' safeguarding and child protection policies, behaviour policies and the CSCP children missing from education policy so that they are fully aware of their role in safeguarding children and are able to fully implement policies.

- All staff are able to identify those children who need extra help and know how to make or request appropriate referrals to early help.

- All staff are vigilant to harm and abuse, can identify those children for whom there are child protection concerns and know how to make or request appropriate referrals to children's social care.

- Staff can work in partnerships with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.

- Staff are encouraged to attend learning events and participate in audit activities provided by the Safeguarding Children Partnership as well as promote published learning from events and serious case reviews.

- A Designated manager is appointed to manage allegations against staff.

- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.

- The schools offers a safe environment for staff and pupils to learn.

- Safeguarding issues are brought to the attention of the governing body when needed to.

PART 3 Safer recruitment

General Principles

The schools recognises safer recruitment practices are an essential part of creating a safe environment for children and will ensure that staff working in the school/college are suitable to do so and do not pose any kind of risk to children.
The school educators will follow the *KCSIE 2025, part 3*

- The school will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles and governors and those involved in the management of an independent school, in accordance with statutory requirements.

- No staff member, volunteer, governor or anyone involved in the management of an independent school, academy or free school will be allowed to take up posts if they have a section 128 direction. Further information on this can be found in the Education and Skills Act 2008.

- Checks with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school. Types of DBS checks can be found on Page 64 KCSIE 2025.

- All job advertisements and application forms will clearly state that the role is a safeguarding role and that applicants will be clear that safeguarding checks will be completed as part of safer recruitment practices. When shortlisting, it is good practice to advise candidates that online searches will be carried out.

- Staff and governors who normally sit on interview panels will have at least one member trained in safer recruitment and no interview should go ahead unless this is the case. Schools will take up the accredited safer recruitment training offered through the Croydon Safeguarding Children Board or any other accredited training provider.

- Although the headteachers will have day-to-day responsibility for the recruitment of staff, the Governing Board will ensure that they maintain an overview of recruitment systems in order to scrutinise practice and ensure all statutory checks are carried out.

- Staff in theschools are responsible for carrying out recruitment checks should ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen.

- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children, or whether a person moves into a post that is a regulated activity.

- In schools, the head teachers will be responsible for keeping a single central record of all staff and volunteers (including governors) who work at the school.

- The single central records should include details of all checks carried out and the outcome of these checks or any certificates obtained in the format shown in appendix 3.

- Where the school/college has salaried trainee teachers, the school/college will ensure that all necessary checks are carried out on the trainees, including DBS checks, and that the outcome of these checks is recorded on the single central record.

- For trainee teachers that are fee-funded, the school will obtain written confirmation from the training provider that the necessary checks have been carried out and that the trainee has been judged to be suitable to work with children.

- Where staff are recruited via third parties such as employment agencies, the head teacher/principal will:
    - seek written confirmation from the agency that the agency has carried out all necessary checks on the individual.
    - request written confirmation of the outcome of all checks
    - request written confirmation that an enhanced DBS certificate has been received by the agency
    - check the identity of agency staff when they first present for work to ensure they are the person against whom the checks were taken out.

Checks to be carried out

Further descriptions about the types of checks can be found on page 69 part 242 KCSIE 2025. Also available of the DBS website. The DBS maintains 'barred lists' of those unsuitable to work with children and vulnerable adults.
In the recruitment and selection of staff and volunteers' schools/colleges will at all times adhere to the government guidance contained within "*Working Together to Safeguard Children*" 2023*)* and '*Keeping Children Safe in Education (2025)*.

The school/college will verify the following information for ***all*** new staff and record on the single central register/record:

- The applicant's identity must be verified by their passport or other photographic ID and proof of address must be provided. Guidance on checking identity can be accessed at GOV.UK
- An enhanced DBS check (with children's barred list check) requested/certificate provided.

- A prohibition from teaching check
- Further checks on people who have lived or worked outside the UK (see paragraphs 285-289 KCSIE 2025)
- A check of professional qualifications, where required.
- A check to establish the person's right to work in the United Kingdom.

Schools/colleges should be aware of the following guidance:

Criminal records checks for overseas applicants - Publications - GOV.UK
Employing overseas-trained teachers from outside the EEA - Publications - GOV.UK
Disqualification by Association
DBS and Filtering

Retention of Documents

The schools will keep copies of the following documents in staff personnel files:

- Documents used as proof of identity such as passports or driving licenses.
- A copy of the DBS **does not** have to be kept. If schools/colleges choose to keep a copy, guidance should be sought through GOV.UK in order to adhere to the requirements of the Data Protection Act 2018.
- **Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10**. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.
- For those who have lived or worked outside of the UK, they MUST undergo the same checks as all other staff in schools and colleges. Further guidance on these checks can be found in paragraph 235.

If a school or college knows or has reason to believe that an individual is barred, it commits an offence if it allows the individual to carry out any form or regulated activity. There are penalties of up to five years in prison if a barred individual is convicted of attempting to engage or engaging in such work. (KCSIE 2025)

Agency Staff

Schools and colleges must obtain written confirmation from the supplying agency or employment business that all required pre-employment checks (including an enhanced DBS check with barred list information, where appropriate) have been completed before the individual begins work at the school or college.

The written confirmation must explicitly state that the DBS certificate has been obtained.
If the DBS certificate contains any disclosures or relevant information, the agency is required to provide a copy of the certificate to the school or college.

In addition, it is strongly recommended that the school or college verifies the identity of the individual on arrival, to ensure that the person presenting themselves is the same individual for whom the checks have been carried out.

Volunteers

Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.
The head teachers will ensure that the following are carried out in relation to unpaid volunteers such as parents who accompany pupils on school outings or provide help in the classroom:

- All volunteers will be required to undergo a recruitment process, such as references, DBS and other checks and interviews that is appropriate and proportional to the duties assigned to them.

- Volunteers who are carrying out a regulated activity, for example being left unsupervised with children or providing personal care to children will be subject to an enhanced DBS check, including barred list information.

- New volunteers who are not carrying out regulated activity but who have an opportunity for regular contact with children will be subject to an enhanced DBS check, but this may not include a barred list check.

- For other volunteers who are not carrying out regulated activity and do not have regular contact with children, the head teacher/principal will carry out a risk assessment to decide whether an enhanced DBS check should be carried out depending on:
    - The nature of the role
    - What information is already known about the volunteer
    - what references from work or volunteering activity the volunteer has provided regarding suitability
    - If the role is eligible for an enhanced DBS check.
- The school/college will ensure that all volunteers are competent to carry out the duties assigned to them and are only assigned duties that are suitable for their qualification and experience.

- Volunteers carrying out regulated activity but for whom a DBS check has not been carried out will be suitably always supervised by teaching staff at a level that ensures the safety of pupils.

- All volunteers will be fully inducted in relation to all school policies and procedures.

Trainee / Student Teachers

Where applicants for initial teacher training are salaried by the school or college, the school or college must ensure that all necessary checks are carried out. If these trainee teachers are engaging in regulated activities relating to children (which in most cases by the nature of the work, they will be), an enhanced DBS check (including children's barred list information) must be obtained (paragraph 300 page 83)

References

- Applicants will be asked to provide a full employment history and details of referees, including previous and recent employers, and who should be a senior member of staff with the authority to provide references. References should be sought **before** interviews and references from colleagues will not be acceptable.

- All references will be requested directly from the referee, including references for internal candidates. Referees will be contacted to resolve any issues that emerge from the references provided. Open references will not be accepted (e.g. to whom it may concern)

- References will be taken up from current employers of a senior level. If the applicant is not currently employed, verification will be sought from their previous school/college as to the dates the applicant was employed and the reasons for leaving the post.

- Where an applicant is no longer working within a children's workforce setting, a reference from the most recent employer in the children's workforce should be sought.

- Any information provided by applicants as part of an application process will be verified with independent sources and any reference received electronically will be checked to verify the originating source.

- Schools and colleges should follow gaps in previous employment.

- Always verify any information with the person who provided the reference and ensure electronic copies come from a legitimate source.

- Compare information on the reference to that on the application and follow up on discrepancies with the candidate.

- Establish reasons for the candidate leaving their current or most recent post.

DBS checks

To ensure that people who work in the schools are suitable to do so and are not barred from working with children, the school/college will apply to the Disclosure and Barring Service (DBS) for police checks and other barred list information as part of the recruitment process.
Where a DBS check indicates previous concerns, the Head should conduct a risk assessment as to the suitability of the applicant to the post. This risk assessment should take account of the level of offending, when the offences occurred and the circumstances around the offences. The assessment should be recorded and placed upon the personnel record of the applicant.
Full DBS checks which include barred list checks will only be taken out on individuals who are involved in regulated activity. This is defined as close, unsupervised contact on a regular basis involving activities such as:

- teaching
- training
- supervising
- care
- guidance and advice
- driving a vehicle
- personal or intimate care.

The activity must be carried out regularly as part of the staff members' day to day responsibilities and the checks will be reasonable in order to safeguard children.
Full DBS checks with barred list checks will also be carried out on permanent staff members working at the school/college or unpaid volunteers who regularly work unsupervised at the school/college and whose work means they have an opportunity for regular contact with children.
Other staff, contractors and supervised volunteers who have opportunities for regular contact with children but do not carry out a regulated activity will be subject to an enhanced DBS check but **not** barred list checks.
Decisions on whether a person is carrying out a regulated activity or whether their role provides opportunities for regular contact with children requiring a DBS check will be made by whoever is responsible for recruitment in the school, for example the head teacher or governor, and the following will be taken into consideration when deciding on this.

- the age of the children.
- their level of vulnerability.
- the numbers of children in the group.
- the nature of the role.
- opportunities for contact with the children.

The school/college has robust procedures for day-to-day staff management and supervision and clear procedures for reporting and acting on concerns. Staff carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.
The school/college will ensure that all DBS checks carried out on staff are renewed after 3 years of the original DBS disclosure.

Alternative Provision

Where a school commissions services from an alternative provision provider, it must obtain written confirmation that the provider has carried out all necessary safeguarding checks on individuals working with pupil's equivalent to those the school would complete for its own staff.
The alternative provider must also confirm in writing that they will notify the commissioning school of any changes that may affect pupil safety, such as staffing changes or new appointments, to allow the school to ensure that appropriate safeguarding checks have been completed on any new personnel.

Schools must always be aware of a pupil's location during school hours. This includes maintaining accurate records of the address of any alternative provision, as well as any subcontracted provision or satellite sites the pupil attends.
Schools should review all alternative provision placements regularly, with reviews taking place at least half-termly. These reviews must provide assurance that:

- The pupils attend regularly
- The placement remains safe
- The provision continues to meet the pupils' needs

If any safeguarding concerns arise, the school must immediately review the placement and, where necessary, terminate the arrangement unless or until those concerns have been fully addressed and resolved.

The DFE has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have- Alternative Provision and Education for children with health needs who cannot attend school - GOV.UK (www.gov.uk)

PART 4 Safeguarding Concerns and Allegations Against a Member of Staff

Conduct and safe teaching practice

- The schools expect staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.

- Procedures are in place for the two areas of allegation, those that MAY meet the threshold of harm and those that DO NOT meet the harm threshold (known as 'low-level concerns)

- The head teachers will ensure that there is a written code of conduct in place and that each member of staff, including volunteers, signs a code of conduct agreement on appointments that sets out the school/college expectations regarding standards of professional behaviour and that all staff receive copies of relevant policies.

- Governors will have their own separate code of conduct. This is a responsibility of the governing board of trust.

- Staff will be expected to follow the schools' social media policy in terms of their use of social media, particularly in relation to professional standards and relationships with pupils and/or their families. All staff and volunteers will sign an acceptable use agreement before being given access to the school/college computer system.

If an allegation is made against a member of staff or volunteer, the school/college will follow Croydon's procedures for managing allegations against a member of staff.
https://www.croydonsafeguarding.org/guidance-policy/lado

The Governing Board will appoint the head teachers as the school Designated Manager for the purposes of the allegations procedures and who will link with the Local Authority Designated Officer (LADO) for all allegations raised. A further staff member will be identified as their deputy to act in their absence or if allegations are made against the staff member responsible.
All allegations in relation to staff members will be referred to the headteacher. Allegations against the head teacher will be referred to the Chair of the Governing Board.

Allegations that meet the harms threshold

An allegation is any information which indicates that a member of staff/volunteer may have:

- ***Behaved in a way that has, or may have harmed a child***

- ***Possibly committed a criminal offence against/related to a child***
- ***Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children***
- ***Behaved or may have behaved in a way that indicates they may not be suitable to work with children***

The last point includes behaviour that may have happened outside of school or college, making them unsuitable to work with children. Known as *Transferable Risk.* Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

This applies to any child the member of staff/volunteer has contact within their personal, professional or community with police or children's social care. The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification.
It is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the head teacher/principal. If the concerns are about the head teacher/principal, the Chair of the Governing Board should be contacted.
The head teacher/principal will always consult with the LADO immediately as soon as school is aware of an allegation.
Following consultation, the head teacher/principal, in agreement with the LADO will decide on appropriate action and consider:

- further inquiries
- immediate referral to the Police
- consideration of disciplinary proceedings
- consideration of a senior strategy meeting

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 as described in Part one of this guidance.
Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

It is important to bear in mind that although the concern may relate to an individual pupil/student, other pupil/students may also be at risk. The procedures in "Safeguarding Children and Safer Recruitment in Education" (*2006 – Updated 2012*), Working Together to Safeguard Children (Dec 2023) and Guidance for local authorities, head teachers, school staff, governing bodies and proprietors of independent schools" (April 2019) will be followed in such cases.
When appropriate (*see guidance above*), consideration will be given to referral of a member of staff to the Disclosure barring service for consideration of the case. If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the LADO to give support and directions on how to proceed.
All procedures set out in Part 4 of KCSIE 2025 will be adhered to alongside previously mentioned documents and used as guidance when managing allegations of any kind.
Where a teacher's employer, including an agency, 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). Details about how to make a referral to the Teaching Regulation Agency can be found Report a teacher for misconduct.

Concerns that do not meet the harm threshold - Low Level Concerns

The term 'low-level' concern does not mean that it is insignificant. 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 or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO(paragraph 430 pg109 KCSIE 2025).

All concerns regarding the conduct of staff working with children should be referred to the LADO to consider whether the threshold for LADO involvement is met.

Following on from submissions made by the London LADO Regional Group to the London Safeguarding Partnership, the London procedures have been altered to reflect the need to consult with the LADO on Low Level concerns. Examples of low-level concerns:

- Being overfriendly with children
- Having favorites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-on-one basis in a secluded area or behind a closed door, or
- Humiliating children.

It is essential that all low-level concerns are reported responsibly to the appropriate individual, properly documented, and addressed in a timely and appropriate manner. Doing so helps ensure concerns are managed effectively and safeguards staff and others working on behalf of schools and colleges from the risk of false allegations or misunderstandings.

Developing and Implementing low level concerns

Allegations Against Staff and Volunteers, supply staff and contractors

Schools have **a code of conduct** in place which clearly includes references to behaviours/relationships between people in a position of trust and those for whom they are responsible that are over the age of 18; this includes the **need for "low level" concerns to be discussed with the LADO and for them to be recorded.**

Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. These could include suspicion, complaints, or disclosure made by a child, parent, or other adult within or outside of the organisation or because of vetting checks undertaken.
It is important to have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Organisations or Individuals using school premises

If a school or college receives an allegation concerning an incident that occurred while an external individual or organisation was using the premises to run activities for children (such as

community groups, sports clubs, or external service providers), the school or college must follow its safeguarding policies and procedures, including notifying the LADO.

Whistleblowing

The schools are committed to fostering a culture of openness and transparency, in line with the principles of the 'Freedom to Speak Up' review. It will implement clear strategies and procedures to ensure that all staff feel confident and supported in raising concerns related to safeguarding or any poor practice that may pose a risk to children.
The school/college acknowledges that, in some cases, staff or pupils may feel unable to report concerns or incidents of malpractice due to a lack of confidence that these will be addressed appropriately.

However, all staff and volunteers have a legal and moral duty to report concerns where they believe that individuals or the school/college may be failing in their responsibility to safeguard and promote the welfare of children.
Where it is not possible to raise concerns within the school/college, staff and volunteers may report concerns to the following.

- Croydon's lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil.
- The following numbers can be used where there are issues regarding the school/college's overall procedures around safeguarding
    - Croydon Council's confidential whistle blowing email address – schoolwhistleblowing@croydon.gov.uk
    - the Ofsted whistle-blowing line on **0300 123 3155**
    - the NSPCC whistleblowing advice line on **0800 028 0285** is open from 8 am – 8pm Monday –Friday or email help@nspcc.org.uk

  The head teachers are responsible for ensuring that these numbers are advertised on the school premises and made available to staff and pupils.
- The CSBC has an Escalation and resolution Policy which can used by staff in school settings

Providing Intimate or Personal Care to Pupils

Staff in primary schools may need to provide intimate or personal care for younger pupils, for example helping a child who has soiled themselves or supervising pupils who are changing for P.E.
Schools must have a written policy in place to promote safe working practices for staff and ensure children's privacy. Children should be encouraged to carry out self-care tasks for themselves where appropriate, but where adult intervention is needed, the following should be observed.

- Staff should follow any agreed school policy or practice when providing intimate or personal care.
- When taking pupils to the toilet, staff should make colleagues aware of the task to be undertaken and explain to the child what will happen.

- Parents should always be notified if intimate care has been provided.
- When providing intimate care, staff should carefully and sensitively observe the child's emotional response and report any concerns to the designated teacher.
- When children are changing, levels of supervision should be appropriate to the pupil's age.
- Staff should avoid any physical contact unless a child needs help.
- Staff should ensure that changing areas are private and that others are not able to enter whilst children are changing.

Behaviour management, physical intervention and reasonable force

The schools will implement a Behaviour Management Policy that has been approved by the Governing Board and aligns with current government guidance. Any use of physical intervention or restraint will be in accordance with this policy.

There may be occasions where it is appropriate for staff to use reasonable force to safeguard pupils. The term reasonable force refers to actions taken by staff to prevent harm, injury, or serious disruption. Government guidance on the use of reasonable force in schools and colleges can be accessed here.

The Department for Education does not support a "no-contact" policy, as it may prevent staff from effectively protecting pupils in exceptional situations.

Special consideration must be given when physically intervening with pupils with SEND or medical needs, as these children may be more vulnerable. To support them appropriately, Individual Behaviour Plans (IBPs) should be developed in collaboration with parents/carers. These plans help ensure a consistent, informed approach across all staff members and provide clarity on appropriate interventions tailored to the child's needs.

All incidents involving the use of reasonable force must be clearly recorded in a suitable format, such as a bound and numbered logbook, and monitored in line with safeguarding and behaviour protocols. *Guidance from the Department of Education provides schools with the power to intervene in a variety of ways in order to manage behaviour within and outside the school. Details of these may be found at:*
Behaviour and discipline in schools - Publications - GOV.UK

HM Government guidance Reducing the need for restraint and restrictive intervention information on how to support children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties who are at risk of restrictive intervention in special education settings. This guidance may also be helpful for schools and colleges.

PART 5 Health and safety- Risk assessments

Responsibility for health and safety

The Governing Board and head teachers will ensure that there is a robust health and safety policy in place to meet the statutory responsibility for the safety of pupils and staff within the school environment.

Any health and safety policy adopted by the school/college will be based on the government guidance (link below) and will seek to balance risk avoidance against providing pupils with opportunities to take part in activities that help them learn to manage risk themselves.
Health and Safety Advice for Schools-responsibilities and duties for schools

Day-to-day responsibility for health and safety issues in the school/college will be delegated to a member of staff who is competent in carrying out these duties and who has received the appropriate training. There should also be a named governor responsible for health and safety.

Risk assessments

The schools will seek to identify and manage risk by using risk assessments. These will be carried out:

- on an annual basis for the school environment.
- school trips.
- Pupils travelling between locations during the school day.
- All work-based learning or work experience placements.
- When a pupil who has been excluded for risky or violent behaviour returns to the school.
- Any changes to the school environment or school practices.
- Any serious incident including serious youth violence, harmful sexual behaviour and/or harassment.

Consideration should also be given to conducting risk assessments before PTA and other parent-led events (e.g. fireworks or fairs) where people outside the school may have unregulated access or the usual measures for health and safety may not be sufficient.

Working with aggressive and violent parents

Where schools are working with families known to children's or adult social care, and concerns arise regarding the behaviour of parents or carers towards school staff, these concerns must be promptly discussed with the Headteacher/Principal and the Designated Safeguarding Lead (DSL). Relevant information should then be shared with children's social care in line with safeguarding protocols.

In situations where there is a high level of risk associated with parental contact, children's social care may convene a multi-agency risk assessment meeting. The purpose of this meeting is to agree on strategies to mitigate risk and ensure the safety of all involved. It is essential that schools and colleges are actively involved in this process to contribute their knowledge of the child and family context and to support coordinated decision-making.

If a parent or carer becomes abusive, threatening, or violent, staff should seek immediate support and contact the police without hesitation to ensure the safety and wellbeing of all members of the school community.

Site security and visitors

- The Governing Board is responsible for the security of the school premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.

- The head teachers will ensure that contractors have received the appropriate level of DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils.

- Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the head teacher/principal will request written confirmation that relevant checks have been carried out for that individual.

- All visitors and contractors will be:
    - informed to report to reception on arrival.
    - expected to provide proof of identity
    - expected to wear a name-badge or always carry some form of identification when on the school/college premises.
    - Suitably supervised by school/college staff at all times.
    - made aware of school/college health and safety procedures.

- The head teachers will ensure that any contract entered with contractors sets out clearly the expectations for the worker's behaviour and the responsibility of contractors to monitor and ensure compliance with school/college policies.

- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.

- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with the class teachers in advance what level of supervision or contact, they will have regarding pupils.

Use of the school premises by other organisations

The schools will only allow use of the school premises by other organisations or schools outside of school hours for the purpose of providing supplemental schooling if:

- The school's incorporating document allows this.

- The organisation provides an overview of what it intends to teach so that the Head teacher, in line with the school letting policy, can make a judgement on whether this is in line with the promotion of values.
- The organisation can provide evidence that they have followed safer recruitment practices and that their staff have the requisite DBS checks.
- Reasonable due diligence checks are completed on the organisation by the school.

Monitoring and Review

To enable the school to monitor the safety of the premises and the school environment, as well as the implementation of policies, the head teacher/principal and the governing board will ensure that.

- All school policies are regularly monitored by the DSL and annually reviewed by the head teacher and agreed by the governing board.
- The schools keeps a central record of all accidents and incidents including what action was taken and by whom.
- Staff are aware of their responsibility to record accidents and incidents.
- The head teachers have an overview of all accidents/incidents.
- Serious accidents and incidents are reported to the Governing Board.
- The DSL ensures a high standard of recording of all concerns about children.
- All accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around school/college safeguarding policies and procedures or any emerging patterns and agreeing to any course of action.

Annex 1:

Role of the designated safeguarding lead

The role of the designated safeguarding lead and their deputy is to take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) within the school/college and to be available during school hours for staff to discuss safeguarding concerns. This role should be explicit within their job description. They **MUST** be a **senior member** of staff from within the **leadership team**

The designated safeguarding lead (and their deputy) will:

- Liaise with and manage referrals to relevant agencies such as Children's Social Care, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS).

- keep the head teacher/principal informed of on-going safeguarding and child protection issues and enquiries, especially section 47 enquiries.

- provide advice and guidance for staff on safeguarding and child protection issues and manage referrals. This includes where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

- ensure the school's safeguarding and child protection policies are up to date and consistent with Croydon's Safeguarding Children Board policies and that policies are reviewed annually.

- ensure all staff, including temporary staff, are aware of and understand policies and procedures and can implement them. These include KCSIE Part 1, the school's Code of Conduct, the School Safeguarding Policy including the Annex to this policy for their school and the Behaviour Policy. They will be a point of contact for advice and support for staff as well as safeguarding partners.

- attend regular training, including Prevent awareness training, and the designated teachers meetings hosted by Croydon and the Safeguarding Children Board in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices.

- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues

- provide regular updates to all staff members and governors on any changes in safeguarding or child protection legislation.

- Liaise with the mental health lead, where safeguarding concerns link to mental health.

- have an awareness of those children who may be in need, young carers and children who have special educational needs and liaise with the SENCO when considering any safeguarding action for a child with special needs.

- liaise with the designated teacher for CLA whenever there are safeguarding concerns relating to a looked after child or previously looked after child.

- oversee child protection systems within the school/college, including the management of records, standards of recording concerns and referral processes.

- provide a link between the school/college and other agencies, particularly children's social care and the Croydon Safeguarding Children Partnership.

- ensure staff, including temporary staff, receive appropriate safeguarding and child protection training every 2 years.

- ensure parents are fully aware of the school/college policies and procedures and that they are kept informed and involved.

- All records are kept up to date and stored securely. It is good practise to keep a separate child protection file

- ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools or colleges to enable continued support the child on transfer. Schools will gain a receipt when passing files to a new provision. This should be within 5 days of transfer.

FULL Details of the role of the designated safeguarding lead and deputy can be found in annex C of KCSIE 2025. It is important that the DSL and DDSL are fully aware of their role and have the capacity to carry out all areas of this.

Annex 2

Early Years Settings Within Schools

This section relates only to primary schools with nurseries and/or reception classes

Legal and policy framework

As an early year's provider, delivering the Early Years Foundation Stage (EYFS), the school aims to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance.

Early Years Foundation Stage Framework

The school will ensure that children taught in nursery and reception classes are able to learn and develop and are kept safe and healthy so that they are ready for school by providing a safe,
secure learning environment that safeguards and promotes their welfare and takes appropriate action where there are child protection concerns.

Safeguarding and child protection

All safeguarding and child protection policies listed in sections 3 of this policy will apply equally to children in early years settings so far as they are relevant to that age group.

In addition, the school has the following child protection policies:

A policy on the use of mobile phones and cameras within the early years setting. recommended policies are:

- parents and carers are asked to switch off mobile phones if they are coming into the early years setting and leave the setting if they need to use their mobile.
- Parents are generally prohibited from taking photographs of children in the early years setting, but for special events such as school performances, may do so on the understanding that the images are not posted onto social media sites or otherwise shared.
- staff seek parental permission to take photographs of the children, which must be linked to teaching the curriculum and that they use school equipment only for this purpose.
- staff do not bring personal mobile phones into the early years setting and use them only during breaks in the staff room.
- the staff will adhere to the E-Safety Policy at all times.
- photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy. Where photographs and videos will involve LAC pupils, adopted pupils or pupils for whom there are security concerns, a member of the Senior Leadership Team will liaise with the Designated Safeguarding Lead to determine the steps involved. The DSL will, in known cases of a pupil who is a LAC or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with a pupil.

- staff will report any concerns about another staff members' use of mobile phones to the Designated Safeguarding Lead. and

- a statement on how notifications will be made to Ofsted in the event of an allegation of serious harm or abuse by any person working in the early years setting.

Suitable people and Safer Recruitment

The school will follow the safer recruitment policy set out in this policy to ensure that staff and volunteers who are recruited to work in the early years setting are carefully selected and vetted to ensure they are suitable for working with children and have the relevant qualifications.

Staff policies will apply equally to staff and volunteers in the early years settings, and the school will ensure that they receive appropriate training and induction so that they are aware of their role and responsibilities, all school policies and the school's expectations regarding conduct and safe teaching practice.

Whenever an allegation is made against a member of staff in the early years setting, the school will follow the Croydon policy- https://www.croydonsafeguarding.org/guidance-policy/escalation-and-resolution

Where in the early years staff are taking medication that may affect their ability to care for young children, this will be notified to the head teacher.

Childcare Disqualification – Appropriate checks should be made if there are concerns about a member of the team or the provision's management to make sure they are not disqualified from working in childcare. All information can be found in the statutory guidance.

Staff training, skills and supervision

- All staff in early years' settings have the relevant qualifications and skills for their role and receive the relevant induction, child protection and safeguarding training in line with this policy.

- All policies set out in section 7 of this policy will apply equally to early-year staff.

- all early year's staff receive supervision that helps them to effectively safeguard children by providing opportunities to discuss issues and concerns and decide on what action to take.

- All early year's staff are able to communicate effectively in English both orally and in writing.

- A member of staff who holds a current pediatric first aid certificate is always available on the school premises and accompanies children on school trips.

- Each child in the early years has a designated key worker who liaises with parents to provide individual support for the child.

- A record is kept of staff training – type of training and dates which is recorded on the single central register (SCR)

Staff ratios

The school will ensure that:

- Staff levels within the early years setting comply with statutory guidance and can meet the needs of the children, provide suitable levels of supervision and keep them safe.

- parents are kept informed of staff members and numbers.

- children are always kept within staff sight and hearing.

For nursery classes:

- There will be at least one member of staff for every 13 children
- one member of staff will be a qualified teacher
- At least one member of staff will hold a full and relevant level 3 qualification.

For reception classes:

- class sizes will be limited to 30 pupils
- classes will be led by a qualified teacher supported by suitably qualified support staff.

For before and after school provision, schools will decide how many staff will be required for adequate supervision based on the age and needs of the children attending.

Health

The school will:

- promote the health of children attending the early years provision
- take necessary steps to stop the spread of infection
- administering medicines only in line with the school's policy
- take appropriate action where children are ill
- ensure any meals provided are nutritious and prepared in a hygienic manner
- notify Ofsted of any serious accident, illness or death of any child whilst attending the early years setting within 14 days.

Health and safety and suitability of premises

The school will ensure that all indoor and outdoor spaces and facilities used for early years settings are safe and fit for purpose and comply with school policies and standards for site safety and health and safety as set out in this policy. Additionally, the school will ensure that all potential hazards within the school and during school trips are regularly risk assessed.

The school has specific policies for ensuring that records of parents details and contact numbers for emergencies are kept up to date and that children are released to the care of their parent or other responsible adults with the parent's consent at the end of the day as well as policies for dealing with uncollected children.

Managing behaviour

The school will take all reasonable steps to ensure that behaviour management techniques are appropriate to the child's age and that corporal punishment is not used or threatened- Behaviour in Schools

Annex 3:

CHILD PROTECTION. DEFINITIONS AND INDICATORS

Definitions

Child protection is part of the safeguarding agenda that focuses on preventing maltreatment and protecting children at risk of neglect or abuse as well as witnessing the ill-treatment of others. Under the Children Act 1989, CSSW have a legal duty to investigate and take any action to protect children where there are concerns that they are at risk of suffering **significant harm**, which is defined as:

Neglect: failure to provide basic care to meet the child's physical needs, such as not providing adequate food, clothing or shelter. failure to protect the child from harm or ensure access to medical care and treatment.

Physical abuse: causing physical harm or injury to a child.

Sexual abuse: involving children in sexual activity, or forcing them to witness sexual activity, which includes involving children in looking at or the production of pornography.

Emotional abuse: failure to provide love and warmth that affects the child's emotional development. psychological ill treatment of a child through bullying, intimidation or threats.

Possible indicators of abuse and neglect

Neglect	● Inadequate or inappropriate clothing ● Appears underweight and unwell and seems constantly hungry ● Failure to thrive physically and appears tired and listless ● Dirty or unhygienic appearance ● Frequent unexplained absences from school ● Lack of parental supervision
Physical abuse	● Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury ● Injuries in unexpected places or that are not typical of normal childhood injuries or accidents ● High frequency of injuries ● Parents seem unconcerned or fail to seek adequate medical treatment
Sexual abuse	● Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development ● Sexual risk taking behaviour including involvement in sexual exploitation/older boyfriend ● Continual, inappropriate or excessive masturbation ● Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy ● Unwillingness to undress for sports
Emotional abuse	● Developmental delay ● Attachment difficulties with parents and others ● Withdrawal and low self-esteem
Indirect indicators of abuse and neglect	● Sudden changes in behaviour ● Withdrawal and low self-esteem ● Eating disorders ● Aggressive behaviour towards others ● Sudden unexplained absences from school ● Drug/alcohol misuse ● Running away/going missing ● Absence from school
Parental attributes	● Misusing drugs and/or alcohol ● Physical/mental health or learning difficulties ● Domestic violence ● Avoiding contact with school and other professionals

Annex 4

Example Safeguarding children monitoring/incident form

Name of school:

Name of child:
DOB:
Status: □ Monitoring due to concerns □ Subject to child protection plan
□ Subject to child in need plan □ Child looked after

Concerns/risks (observations, comments or disclosure)

Views of child and parents

Next Steps

□ continue monitoring
□ referral to MASH/MASH
□ referral for education support services
□ carry out Early Help Assessment
□ referral to health services
□ referral on behalf of parent/carer

Action taken and Outcomes (include dates when action taken and outcomes confirmed)

Printed Name of staff member: Signed:
Date:

Annex 5-Useful links and information

Homeless-Intervention@croydon.gov.uk - for all homelessness quires

TAplacements@lbccloudadcroydongov.onmicrosoft.com - If the applicant is in a Temporary accommodation

HSG-PRIVATEHOUSING@croydon.gov.uk - if the family are living in private accommodation and they have disrepair issues

Tenancy.Service@croydon.gov.uk - if they reside in a council property and have issues regarding the tenancy.

DfE advice for schools: teaching online safety in schools

UK Council for Internet Safety (UKCIS).[1] guidance: Education for a connected world

UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people

The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors

National Crime Agency's CEOP Education Programme: Protecting children and young people from online child sexual abuse through education

https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2

Summary	**About the guidance (no changes made)**
Part one	**Safeguarding information for all staff (no changes made)**
Part two	**The management of safeguarding**
Page 36	Para 128 - We have added a note to say that we expect to publish revised guidance on Relationships, Sex, and Health Education this summer. If published, we will signpost to this guidance in September 2025.
Page 38	Para 135 - Updated to clarify misinformation, disinformation and conspiracy theories are safeguarding harms.
Page 40	Para 142 - Link added to the plan technology for your school service, which schools can use to assess themselves against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

[1] UK Council for Internet Safety Education subgroup is made up of sector experts who collaborate to produce advice and guidance to support schools and colleges keep their children safe online.

Page 41	Para 143 - Link added to DfE guidance on the use of generative AI in education (2025) at end of filtering and monitoring (FM) section to support schools and colleges.

	Para 144 - wording amended in the cybersecurity standards for schools and colleges advice to clarify that it was developed to help schools improve their cyber resilience.
Page 47	Para 169 - 170 information added that clarifies and reflects existing AP Guidance
Page 49	Para 177 - updated to clarify 'working together to safeguard attendance' 'is now 'statutory' guidance.
Page 54	Para 199 - has been amended to clarify that the role of the virtual head has been extended to include responsibility for promoting the educational achievement of children in kinship care.
Page 56	Para 204 - We have added a note to say that we expect to publish the revised guidance on gender questioning children this summer. If published, we will signpost to this guidance in September 2025. Para 205 - removal of 'spectrum' and 'disorder' to align with SEND code of practice.
Part three	**Safer recruitment**
Page 74	Para 260 - reference to TRA's Employer Access Service removed and replaced with new link to GOV.UK page.
Page 75	Para 266 - references to TRA's Employer Access Service removed and replaced with new link to GOV.UK page.
Page 85	Para 319 - reference to Employer Secure Access removed and replaced with link to GOV.UK for S128 checks.
Page 87	Para 331 - information added that clarifies and reflects existing AP Guidance.
Part four	**Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors**
Page 106	Para 422 - amended to correct the title of the Information Commissioner's employment practice guidance.
Part five	**Child-on-child sexual violence and sexual harassment**

Page 140	Para 545 - Link added to the Lucy Faithfull Foundation's 'Shore Space'. which offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.
Annexes A, B, C, D and E	
Annex B - Page 157	Header removed
Annex B – Page 163	Link added to the CSA Centre's Resources for education settings | CSA Centre.
Annex B – Page 164	Link added to the Preventing Child Sexual Exploitation | The Children's Society.

Annex 6: School Single Central Record/Register (SCR)

Please note:

- Checks carried out on volunteers, maintained school governors and local governors in an academy trust do not need to be recorded on the SCR under the latest version of Keeping Children Safe in Education (KCSIE), **but it is recommended hincluding them**
- KCSIE does not say specifically that contractors must be on the SCR, but it does say all staff who work at the school must be included, including supply staff, so it's best to include contractors too
- Where academies are mentioned, this includes free schools

Important notes

This record should indicate what checks have been taken out for the following:

- For schools, all staff, including supply staff and teacher trainees on salaried routes, who work in school and others who work in regular contact children in school, including volunteers and governors
- For independent schools, including academies and free schools as above plus all members of the proprietorial body and involved in the management of the school
- For colleges, all staff providing education and/or whose positions involve a relevant activity

Agency staff

Please give details of confirmation of checks that have been carried out by the supplying agency.

Volunteers

- Unsupervised volunteers should not be left alone or allowed to work in regulated activity.
- For new volunteers in regulated activity who regularly teach children unsupervised an enhanced DBS is needed with a barred list check.
- For new volunteers not in regulated activity, schools should obtain an enhanced DBS certificate.
- Existing volunteers who provide personal care, the school should consider obtaining an enhanced DBS.
- Existing volunteers who are unsupervised do not need to have a DBS check with a barred list check because the volunteer should have been checked originally.
- For existing volunteers not in regulated activity there is no requirement for an enhanced DBS check (a school can request one but may not request a check of the barred list).
- For a volunteer not engaging in regulated activity a risk assessment should be made and a professional judgement made about the need for an enhanced DBS check.
- Supervision of volunteers – there must be supervision by a person in regulated activity, where supervision occurs, this must be regular and day to day and the supervision must be reasonable in all the circumstances to ensure the protection of children.

Regulated activity

Regulated activity (see p67 for definition) – the period condition is at any time on more than three days in any period of 30 days. 'Frequently' is doing something once a week or more. Work of the nature defined is considered regulated activity if done regularly, where this is the case an enhanced DBS check is needed with a barred list check.

Contractors

Contractors or employees of contractors working at the school should have the appropriate level of DBS to check if a check is required, e.g. if the contractor is carrying out teaching or providing a level of care or supervision of children regularly.

Documents and certificates

Name	Date of service	Address	DOB	Evidence of identity: (Initials of person carrying out check and date of check)	Barred list check (date and initials of person carrying out check)	Enhanced DBS check (date and initials of person carrying out check)	Prohibition from teaching check (date and initials of person carrying out check)	Section 128 check (date and initials of person carrying out check)	Further checks on persons who have worked outside the UK (date and initials of person carrying out check)	C C (

Please give details of any documentary evidence obtained as part of each check. Please note that there is no requirement to list DBS numbers. Also, to comply with the Data Protection, DBS certificates should not be retailed any longer than six months. Other documents to verify identity, right to work in the UK etc, should be kept in personnel files.

Model Single Central Record/Register Document

Key:
Use this to confirm full names when initials have been used

It is recommended to have this document in Excel; separate tabs can be created and separate spreadsheets completed for the various roles within school:
Teaching staff, Support staff including office staff and site staff, Supply Staff, Volunteers, Governing board, contractors