

WHITGIFT SCHOOL

Safeguarding and Child Protection Policy

September 2023

Key contacts

Headmaster

Name: Chris Ramsey

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Designated Safeguarding Lead

Name: Dayle Kirby (Deputy Head, Pastoral)

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Deputy Designated Safeguarding Leads:

Name: David Cresswell (Senior Deputy)

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Name: Adrian Norris (Assistant Head, Pastoral & Boarding)

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Name: Faye Carter (Director of Sixth Form & Designated Mental Health Lead)

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Deputy Designated Safeguarding Lead with responsibility for Prevent

Name: Tom Stead (Head of Fourth Form/Year 10)

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Designated Member of Staff for Children Looked-After & Children with Care Experience

Name: Reverend Alan Bayes (School Chaplain)

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Nominated Governors for Safeguarding:

Name: Elaine Teale (Safeguarding Governor to the School)

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Name: Jo MacKenzie (Safeguarding Governor to the Court)

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Name: Christopher Houlding (Chairman of the Court of Governors of The John Whitgift Foundation)

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Local Authority Designated Officer (LADO):

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Senior LADO: Steve Hall
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MASH (Multi-Agency Safeguarding Hub):

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

Professionals Consultation Line: Tel: 0208 726 6464 (1-4.30pm)

Out of Hours line: 020 8726 6400 (5pm-9am)

MASH Service Manager: Jonathan Lung
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Croydon Safeguarding Children Partnership (CSCP)

Website: [https://croydonlcsb.org.uk/Safeguarding learning & development](https://croydonlcsb.org.uk/Safeguarding%20learning%20&%20development)
Email: CSCP@croydon.gov.uk
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Core operational policies and procedures

Purpose and aims of this policy

This Policy reflects statutory guidance from the Department for Education 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). The School in England **must** have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of the guidance children includes everyone under the age of 18 (KCSIE 2023). KCSIE now applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.

It is essential that **everybody** working at Whitgift School understands their safeguarding responsibilities. 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. In addition, as a boarding school, **all staff** need to be alert to the extra vulnerabilities of children living away from their parents and of children with Special Educational Needs and Disabilities (SEND) in our setting, inappropriate student relationships and the potential for child-on-child abuse.

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 robust.
- Ensure that links with relevant agencies are effective including working in partnership regarding child protection matters, including attendance at case conferences and core group meetings.
- Ensure the school environment is safe and is one in which students feel secure and are encouraged to talk freely about anything that concerns them.
- Ensure students know there are adults in the school whom they can approach if they are worried about anything.
- Ensure the curriculum and other provision, including opportunities in the 'Ideatum' (Personal Social Health and Economic Education/PSHEE) curriculum, develop and equip students with the skills needed to feel safe and adopt safe practices
- Support for students 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, including low-level concerns (which are covered in a discrete policy).
- Ensure staff follow accepted "safe practice" principles when working with students.
- Ensure students are protected from all forms of harm.
- Ensure that the specific needs of boarders are met and that the School adheres to the National Minimum Standards for Boarding Schools.

PART 1: Safeguarding Information for ALL Staff

1. Induction and training

- The Headmaster will ensure that all staff are fully inducted, are made aware of the following policies of the School 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
 - Safeguarding and Child Protection Policy and procedures (including information themes such as Child-on-Child abuse, contextual safeguarding, and Online Safety
 - Behaviour policy, including measures to prevent bullying including cyberbullying, prejudice based and discriminatory bullying.
 - Staff Code of Conduct, Low Level Concerns Policy, allegations against staff and whistleblowing procedures. This includes the Whitgift Staff and Visitors Acceptable Use Policy, which covers the use of technology (including mobile phones), student-staff relationships and communication, and the use of social media.
 - Safeguarding response to children who are absent from education, especially 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 Keeping Children Safe in Education 2023 Part 1/Annex A.
- The Designated Safeguarding Lead will ensure that all staff are fully inducted with regard to the School's child protection procedures and that they receive safeguarding and child protection training on a two-yearly basis as a minimum. This will include online safety.
- The Headmaster will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
- School staff and governors will receive safeguarding training at the level that is appropriate to their roles and responsibilities, including multi-agency training, where applicable.
- As well as basic safeguarding training, the Designated Safeguarding Lead and his Deputies 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 are for 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 staff will receive regular and timely updates on child protection and safeguarding issues via the Designated Safeguarding Lead via his weekly 'Pastoral Update' e-mail to ensure they remain up to date with new legislation and developments.
- **All** staff should know what to do 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 disclosure 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. Victims should never be made to feel they are a problem or 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. (This may be the case particularly with children with SEND but not exclusively.)

2. Safeguarding children

Safeguarding: This 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:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care,
- and taking action to enable all children to have the best outcomes.

Early help cases

Staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating. In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:

- children with disabilities and additional needs, including those with SEND (whether they have an EHCP or not)
- young carers
- children with mental health needs
- children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime
- children who frequently go missing from home, school or care
- children who are misusing drugs or alcohol
- children at risk of exploitation through modern day slavery and trafficking
- children at risk of being radicalised or exploited
- children with a family member in prison or who are affected by parental offending
- children whose home circumstances are negatively affected by adult substance misuse, mental ill health or domestic abuse
- 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
- children at risk of honour-based abuse (HBA) such as Female Genital Mutilation (FGM) or forced marriage
- children who are persistently absent from education
- children who are privately fostered children.

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.

If the child requires an early help service from another agency, the School 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 the child.

Where the child is receiving an Early Help service, the School will work as part of the Team Around the Child/Family (TAC/F) and take up the role of lead professional, where this is appropriate.

Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the School believes that this is not the case, consideration should be given making a referral for a statutory social work service.

Child Protection: This is about those at risk of significant harm

The School will carry out its duty to safeguard students, 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; and
- undertaking that role so as to enable children to have optimal life chances so they can enter adulthood successfully.

For a list of definitions and indicators of abuse and neglect, see Annex 2 of this policy.

The Croydon Safeguarding Partnership threshold document can be found [here](#).

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

- Abuse: Neglect, physical, sexual and emotional (see KCSIE 2023, pages 9-11)
- Disguised compliance
- Children Missing in Education (CME)
- Children who are home schooled ('Hidden Children')
- Radicalisation / extremism
- So-called 'Honour' Based Abuse (HBA)
- Breast Ironing
- Mental health concerns including self-harm
- Bullying including on-line (cyber) bullying and prejudice based bullying
- Gender based violence / Violence Against Women and Girls (VAWG)
- Domestic Abuse
- Poor parenting
- Child sexual exploitation (CSE) and trafficking
- The impact of new technologies on sexual behaviour
- Substance misuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Fabricated or induced illness
- Faith abuse
- Gangs and serious violence (including Child Criminal Exploitation (CCE) and County Lines)
- Private fostering
- Sexting (Youth Produced Sexual Imagery)
- Child-on-child abuse
- Teenage relationship abuse
- Serious Violent Crime
- Sexual violence
- Sexual harassment
- Children with family members in prison
- Children in the court system
- Homelessness

- Adverse Childhood Experiences (ACEs)
- Trauma and attachment issues
- Up-skirting
- Knife crime
- Modern Day Slavery
- Cybercrime

The School will seek advice from the MASH Professionals' Consultation 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. The MASH Professionals' Consultation number is 0208 726 6464 and it is open from 1.00pm-4.30pm, Monday to Friday.

All referrals for a children's social care service or Early Help will be made via the MASH Portal:

[MASH Referral](#)

Parental consent for referral will be sought *unless* there are concerns this may put the child or young person at risk of additional harm, or the MASH team advises that parental consent should not be sought. This links to specific areas, such as allegations of sexual abuse, concerns of fabricated or induced illness, or when the parent is the alleged perpetrator, in which case a referral should be made regardless. Staff will also share information and work in an integrated way to ensure a co-ordinated response from agencies to support families and meet 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 via a postcode search.

Referral for a statutory social work service

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the Designated Safeguarding Lead or their Deputy, who are most likely to have the most complete safeguarding overview. Following consultation, the Designated Safeguarding Lead should decide on whether to make a referral to children's social care via the MASH. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that the School provides as much information as possible, as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual (extra familial) approach to address such harm. (Additional information is available here: [Contextual Safeguarding](#).)

Where the referral raises concerns that the child is at risk of significant harm, the case will be passed on to Croydon's MASH team manager to triage and allocated to a social worker to gather relevant information from other agencies. MASH will inform the School 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:

- Carrying out a child and family assessment to identify the child's needs and establish if the child is a **child in need** under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.
- Convening a **strategy meeting/discussion under child protection** procedures as set out in section 4 of the Children Act 1989 for any child where there are concerns about significant harm and/or taking any immediate action in order to protect the child.
- Providing interim services for the child and their family, whilst work is on-going (including details of appropriate services).
- Families may also be referred to Early Help or signposted to universal services.

Children who need a Social Worker

Children may have a social worker due to neglect, abuse or difficult family circumstances. Their experience can leave them vulnerable to further harm and we have a duty as professionals to help to protect them. The local authority should communicate with the Designated Safeguarding Lead so he knows if a child has a social worker and therefore enable him to make decisions which are in the best interest of the child's safety, welfare and educational outcomes.

Further documents which may assist in supporting these families can be found in [Review of children in need. Help, Protection, Education: concluding the Children in Need review.](#)

3. Child protection procedures

The Role of the School

The School will have due regard to the following policy documents in order to support the protection of students who are at risk of significant harm.

[Working together to safeguard children](#)

[What to do if you're worried a child is being abused - Publications - GOV.UK](#)

[London Safeguarding Children Board: Child Protection Procedures](#)

[Keeping Children Safe in Education](#)

[CSCB local policies and procedures](#)

[London Procedures](#)

In line with these policies and procedures, the School will:

- identify those students where there are child protection concerns and make a referral to MASH;
- attend child protection case conferences in order 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; and
- carry out the School's role in implementing the child protection plan and continually monitoring the child's wellbeing, 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 student are reported to the Designated Safeguarding Lead.
- Staff should refer to Annex 2 of this policy for abuse indicators or to page 12 onwards of KCSIE 2023, for signs that may suggest a student is 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 Professionals' Consultation Line on a no-names basis.
- Concerns may be monitored over time and should be logged within iSAMS Wellbeing Manager.
- **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 students are highly confidential and will be kept securely within iSAMS Wellbeing Manager, separate from the student's education records.

- The Designated Safeguarding Lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- All safeguarding and child protection entries should make clear who has submitted the record and should be dated.
- Records should show:
 - what the concerns were;
 - whether information of the concern was shared with the parent(s) and what their response was;
 - where relevant, what action was taken to refer on concerns or manage risk within the School;
 - whether any follow-up action was taken;
 - how and why decisions were made; and
 - 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 outcomes.
- An entry in iSAMS Wellbeing Manager should be made:
 - 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 leaves the School, any safeguarding or child protection records are passed securely to the Designated Safeguarding Lead at the new school or college, and confirmation of receipt is obtained. The Designated Safeguarding Lead should also consider if there is a need to share any key information about the family ahead of the student's start date. This may assist the new school or college in planning appropriate support for the family.
- A copy of any child protection or safeguarding information should be retained by the School and kept in line with the School's information and records retention schedule. Hard copies of child protection and safeguarding records must be disposed of as confidential waste.

Dealing with disclosures

If a student discloses to a member of staff that they are being abused, neglected or exploited, the member of staff should:

- listen to what is said without displaying shock or disbelief and accept what the child is saying;
- allow the child to talk freely;
- reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to children's social care;
- reassure the child that what has happened is not their fault and that they were right to tell someone;
- not ask direct questions but allow the child to tell their story;
- not criticise the alleged perpetrator;
- explain what will happen next and who has to be told;
- make a formal record on iSAMS Wellbeing Manager and pass the information on to the Designated Safeguarding Lead.

DO NOT DELAY

- Colleagues should tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a lesson to do this. They should not leave notes in the DSL's pigeon hole or rely on sending an e-mail as they may not check these until the end of the day, once the student has gone home.
- Early referral gives more time to offer help to the student and family before the situation becomes more serious.

- When the matter is already severe or serious, early referral gives more time for others to protect the student.

The Designated Safeguarding Lead may consult the MASH.

MAKE WRITTEN NOTES

- At the earliest opportunity, staff should make a written (or electronic) record of your concerns, which can then be entered on iSAMS Wellbeing Manager. Colleagues should record facts accurately and avoid expressing opinion. These notes will help to ensure accuracy in recalling events later. Handwritten notes should be legible, include the date and time, and be signed.
- Members of staff should not take photographs of any physical injuries, but record these on a body map, if they do happen to have seen them. They should not use audio to record disclosures.
- Any original notes must be copied and given to the Designated Safeguarding Lead as soon as possible and kept, even if colleagues are entering concerns using iSAMS Wellbeing Manager.

Referral

- Where possible, a decision on whether or not to refer a student 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. If staff are unable to discuss the matter with one of the School's DSLs, they should consult with a member of the Senior Leadership Team, and take advice from the MASH team social worker. The Designated Safeguarding Lead should be informed as soon as possible afterwards.
- Referrals should be in writing using a MASH safeguarding referral form completed either by the staff member raising the concern or by the Designated Safeguarding Lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the MASH safeguarding referral form within 48 hours.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the Designated Safeguarding Lead may discuss the case on a "no-names" basis with the MASH Professionals' Consultation Line to obtain advice on how to proceed.
- Parental consent must be sought prior to the referral being made, unless to seek 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 referral should be made directly to them. If the child is not already known to children's social care, referrals should be made to MASH. If the child lives outside Croydon, a referral should be made to their home local authority.
- All referrals will be acknowledged by the MASH and the referrer informed of what action will be taken.
- If the School does 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 Designated Safeguarding Lead.

Attendance at Case Conferences, Core Group 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 is provided to children's social care during the course of any child protection investigation.
- The Designated Safeguarding Lead will ensure that the School is represented at child protection case conferences and core group meetings.

- Where possible, a member of staff who knows the child best, such as the tutor or Head of Year, will be nominated to attend case conferences and other meetings.
- If a colleague who knows the child well is unable to attend, the Designated Safeguarding Lead or their Deputy will attend.
- If no-one from the School can attend, the Designated Safeguarding Lead will ensure that a report is made available to attendees at the conference or meeting.

Monitoring

Where a student is the subject of a child protection plan, and the School has been asked to monitor their attendance and welfare as part of this plan:

- monitoring will be carried out by the relevant staff member (the tutor or Head of Year) in conjunction with the Designated Safeguarding Lead;
- all information will be recorded in iSAMS Wellbeing Manager, prior to each conference or core group meeting;
- copies of entries made to iSAMS Wellbeing Manager will be made available to attendees of all conferences and core group meetings; and
- the Designated Safeguarding Lead will notify the allocated social worker if the child is removed from the School roll, suspended, or goes missing.

4. Confidentiality and Information Sharing

KCSIE 2023 tells us “The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.”

Colleagues who require further information and advice about data protection should contact James Stremes (Estates Bursar).

- All information obtained by the School’s staff about a student will be kept confidential and will only be shared with other professionals and agencies with the family’s consent.
- If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 and 17 are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act. Otherwise, consent should be sought from parents.
- Where a child is at risk of suffering significant harm, the School has 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, the School 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 taking this step, the School should consider the proportionality of disclosure against non-disclosure: is the duty of confidentiality overridden by the need to safeguard the child?
- Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, the School should discuss this with the MASH Professionals Consultation Line on a “no-names” basis to gain advice on whether this course of action should be taken.

- Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the stated purpose.
- In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the School'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 Professionals' Consultation Line.

Working with Parents and Carers

The School recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of students.

The School will:

- make parents aware of the School's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students on where necessary, by notifying all parents and/or having a safeguarding statement on the home page of the website and making all School policies available on the School website or on request
- provide opportunities for parents and carers to discuss any problems with tutors, teachers and other relevant staff
- consult with and involve parents and carers in the development of School policies to ensure their views are taken into account
- ensure a robust complaints system is in place to deal with issues raised by parents and carers
- provide advice and signpost parents and carers to other services and resources where students need extra support
- the Schools is also be aware of the additional guidance available from the DfE on dealing with issues around parental responsibility:
[Understanding and dealing with issues relating to parental responsibility](#)

Multi-agency Working

- The School will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004 and Working together to safeguard children 2018.
- The School recognises its vital role in safeguarding school-age children and will co-operate with the Croydon Safeguarding Children Board to ensure joint working with partner agencies in order to improve outcomes for children in Croydon.

Inspection

- From September 2023, the Independent Schools' Inspectorate (ISI) published a new framework for inspection which can be found [here](#).

Safeguarding Issues

The Law – Keeping Children Safe In Education 2023, page 24 sets out legal requirements around safeguarding. These include:

[The Human Rights Act 1998](#)

[Equality Act 2010](#)

[Equality and Human Rights Commission](#)

Child-on-Child abuse

Child-on-child abuse is where a student's behaviour is likely to cause significant harm to other students.

This is most likely to include, but not limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- gender-based violence
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals
- upskirting (typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment. (Voyeurism (Offences) Act 2019)

This type of abuse should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence. The School will refer the perpetrator and the victim to children's social care via MASH

Child-on-child sexual behaviour, sexual violence and harassment

The School 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 premises, and/or online (what to look out for, and indicators of abuse are set out in Part One of KCSIE 2023).

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to Sixth Form age. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. All staff working with children are advised to maintain an attitude of **‘it could happen here’** and **know we have a ZERO-tolerance approach to child-on-child harassment, abuse and violence.**

Sexual violence and sexual harassment can occur online and offline (both physical and verbal) and are never acceptable.

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 104 KCSIE 2023). 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, 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 students from the school, the School's duty to safeguard students remains the same. The Designated Safeguarding Lead or his 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 “[c]onsent 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 2023 tells us that “[w]hen referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of [the School]. 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’ or taunting
- physical behaviour, such as: deliberately brushing against someone or interfering with someone’s clothes
- displaying pictures, photos or drawings of a sexual nature
- upskirting
- online sexual harassment.

Further examples can be found on page 106 of KCSIE 2023.

Harmful Sexual Behaviour (HSB)

This is where sexual behaviour ranges from developmentally ‘normal’ to ‘inappropriate’, ‘problematic’, ‘abusive’ and ‘violent’. HSB is widely used as an overarching term and can happen online or face-to-face. When considering HSB, both the ages and the stages of development of the children are critical factors.

Full details can be found on page 107 of KCSIE 2023.

Policy

- The School recognises that sexual violence and sexual harassment between students is a serious safeguarding issue and such behaviour will not be tolerated. The School’s Behaviour Discipline and Exclusions Policy and Anti-Bullying Policy reflect the School’s approach, and staff and students will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.
- The School will follow the guidance within Part 5 of KCSIE 2023 as part of its 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 students.
- The School will take all necessary steps to put in place a planned ‘Ideatum’ (PHSEE) curriculum to convey its policy for preventing HSB and to promote respectful behaviour between students with

regards to sexual conduct. The School will also have due regard to the new [Relationships Education Curriculum](#) which became compulsory for all schools from September 2020.

- The School 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 and appropriate referrals made to the police and children's social care.
- The School will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all students 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.
- The School 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 stressful and distressing.
- The School will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of KCSIE 2023.
- The governors should ensure that the School 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 students and staff from the alleged perpetrator within the School environment.
- Where the allegation involves material posted online, the School 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 in schools](#) and in [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).
- 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 DSL or Deputy is not involved in the initial report.
- When there has been a report of sexual violence, the Designated Safeguarding Lead or 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, adults and staff) at the School, especially any actions that are appropriate to protect them.
- The member 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 Professionals' Consultation Line before making a decision. Possible outcomes include referral to Early Help Services, MASH, Learning Access and/or the police, or managing the matter internally under School policies.
- Where a referral is 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 The School 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 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
- Any ongoing risks to the victim, other children, adults or School staff
- Other related issues and wider context, including any links to child sexual exploitation (CSE) and child criminal exploitation (CCE)
- The School will take any necessary action to continue to safeguard the victim and other students within the School 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 School 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 will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment. The School 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 all it can 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.
- School will consult with Part 5 of KCSIE 2023 (specifically pages 110 to 115) when managing allegations of child-on-child sexual harassment or sexual violence. The School 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 (paragraph 480), safeguarding and supporting victims (paragraph 551), safeguarding and supporting the alleged perpetrator (paragraph 540), disciplining alleged perpetrators (paragraph 544) and safeguarding other children (paragraph 553), can all be found in KCSIE 2023.
- The School will refer to paragraphs 527-530 with regards to unsubstantiated, unfounded, false or malicious reports and follow the recommendations and guidance on recording information and what to do when the report is 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 Headmaster will be guided by parole conditions where relevant to keep children safe in the School. This information must be treated as strictly confidential and will only be shared with the Designated Safeguarding Lead if appropriate.

Additional procedures

The Designated Safeguarding Lead maintains a confidential log of all cases of alleged sexual abuse and sexual harassment involving Whitgift students. Details of these incidents are shared only with the Headmaster and the Deputy Designated Safeguarding Leads.

When dealing with incidents, the school will ensure that the report of the incident contains facts and sets out clearly the steps to be taken, with the views of the victim clearly recorded.

The school is aware of its equality duty. Victims of sexual violence and harassment are more likely to be female but follows the same procedures and ensures the same level of response for incidents involving male students or incidents where the victim and perpetrator are of the same sex.

Cases may be managed internally by the School 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 students. Such matters will still be referred to the MASH Professionals' Consultation Line.

The School gives 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. However, the schools must be able to justify any measures taken and that they do not interfere with the educational opportunities of either party.

The School takes a robust approach to any allegation of sexual harassment or sexual violence towards a member of staff, and students who commit such acts are likely to be reported to the police and suspended or permanently excluded. (Further information is contained in the school's Behaviour, Discipline and Exclusions Policy.)

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 'Ideatum' (PSHEE) curriculum and to boarding students.

Contextual (Extra Familial) safeguarding for young people.

The School is 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 or from their own peer group. Protecting children from these external risks is known as 'contextual safeguarding'. This policy therefore reflects the needs of young people in Croydon and other communities, through its adherence to the procedures set out in the Borough and across London.

The School acts as a protective factor in children's lives. Children who do not attend can become 'hidden', which means that the School is 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 the School roll, including children who have been excluded both on a permanent or an temporary basis (suspended) 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.

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 the School becomes aware of a child who is missing from home or care and that child has not been reported missing to the police, the School should do so, using the non-emergency number 101. Running away may be an indicator of other problems and therefore referral to MASH should be considered. Early intervention after the first episode may prevent a child from being exploited. Further guidance may be found here: [Statutory guidance on children who run away or go missing from home or care](#)

Child Criminal Exploitation (CCE) and County Lines

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 ones, 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; and
- 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 the School becomes aware of child or young person who may be at risk, a referral should be made to MASH. Further information may be found here:

[Safeguarding children who may have been trafficked](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

KCSIE 2023 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, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

a) Children at risk of Sexual Exploitation (CSE)

Both Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse that occur 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 into sexual or criminal activity, either in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. This abuse can occur with males or females, adults or children and can be a one-off event or part of a series. It may present differently in boys and girls.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology.

The three main types of CSE

1) 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.

2) Boyfriend/Girlfriend

Abuser grooms 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 have sex with multiple men or women. They may also be threatened with violence if they try to seek help.

3) Organised exploitation and trafficking

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

Indicators of CSE 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 or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/messages/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 social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional wellbeing

Potential vulnerabilities

Although the following vulnerabilities increase the risk of CSE, it must be remembered that not all children with these indicators will be exploited. CSE can also 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 (e.g. domestic violence or parental substance misuse, mental health issues or criminality)
- 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 the School becomes aware of a child that may be being sexual exploited they should refer to MASH.

There is also further guidance here: [Child sexual exploitation – DfE guidance](#)

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

The School is a source of safety and security for many young people. Supporting young people to build resilience and raise their awareness of the risks associated with gangs and serious youth violence is key to helping keep young people safe in their communities. Staff should be aware of the indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- increased absence
- change in friendship groups
- relationships with older individuals or groups
- 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 approaches by criminal networks or gangs. The School needs to be alert to the possibility of children and young people bringing weapons onto the site. There are various reasons why a young person 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 student found in possession of a weapon in the School or any weapon that is found on the site. Further guidance may be found here: [Preventing youth violence and gang involvement](#)

c) 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 introduced the first ever statutory definition of domestic abuse and recognises 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 includes 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 must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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 witnessed the domestic incident, the police will inform the key adult (usually the Designated Safeguarding Lead) at the School before the children arrive. This ensures that the school has up-to-date and relevant information about the children's circumstances and can enable immediate support to be put in place, according to the children's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or the School 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 [here](#).

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 School should refer young people who are victims of domestic or sexual violence to MASH. Further advice and guidance can be obtained from the Family Justice Centre who can be contacted by phoning their helpline on 0208 688 0100 or by emailing fjc@croydon.gov.uk

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC: What is domestic abuse](#)
- [Refuge: what is domestic abuse](#)
- [Safelives: young people and domestic abuse](#)

d) Prevention of Radicalisation and Extremism

The School's safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism. In writing the curriculum for 'Ideatum' (PSHEE), the School has had due regard to the following guidance: [Promoting fundamental British values as part of SMSC in schools](#)

Under the Counter-Terrorism and Security Act 2015, the School 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. More information may be found here about [The Prevent Duty](#).

The School should make a referral to MASH, using the MASH Safeguarding Referral Form, if it is concerned 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
- a younger student may be at risk due to their parent's radicalisation.

Risk indicators of vulnerable students

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 student 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 student have access to extremist influences?
- Does the student access the internet for the purposes of extremist activities?
- Has the student witnessed or become the victim of racial or religious hate crimes?
- Does the student support terrorist attacks, either verbally or in their written work?
- Is there a pattern of regular or extended travel within the UK?
- Does the student have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the student have insecure, conflicted or absent family relationships?
- Has the student 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 student's life has extremist views or sympathies?
- Is the student the victim of social isolation?

[Educate Against Hate](#) is a website launched by the government 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 is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

The School aims 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 the Croydon Channel Panel is being considered, the School will discuss these concerns internally and also consider external advice and guidance, where necessary and appropriate.

Tom Stead is the Deputy Designated Safeguarding Lead who takes a leading role in the training and advising of staff in relation to anti-radicalisation. He and the School's Designated Safeguarding Lead should be consulted for internal advice on making a referral to Channel. Prior to making a referral, the School may also get advice from the Safer Schools (Police) officer, the MASH Professionals' Consultation Line and/or Croydon's Prevent Co-ordinator (Haydar Muntadhar: email haydar.muntadhar@croydon.gov.uk. telephone 0208 726 6000 (ext. 62070))

e) Mandatory reporting of Female Genital Mutilation (FGM)

While Whitgift is a boys' school, we recognise the importance for staff and students to have an understanding of FGM as it may affect family members, friends or female visitors to the school, such as those participating in the Primary School Project or the Summer School. FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons and is illegal in the UK. FGM typically takes place between birth and around 15 years old, however, it is believed that the majority of cases happen between the ages of 5 and 8.

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 PSHEE;
- visiting female elder from the country of origin;
- being taken on a long holiday to the country of origin; and
- 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 victims 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 the legs.

The School will follow the statutory guidance on FGM in order to safeguard girls who are at risk of FGM:

[Multi-agency statutory guidance on female genital mutilation](#)

Where a student makes a disclosure of FGM, the School will follow the mandatory reporting rules and make appropriate referrals to the police and the MASH, using the MASH Safeguarding Referral Form.

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

Breast ironing is practised in some African countries, notably Cameroon. Girls aged between 9 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.

If the School becomes aware of a child that may be at risk of a **forced marriage**, they should, in the first instance, contact the MASH. If a child is at immediate risk, they should contact the police. Further advice on forced marriage can be obtained from the Foreign and Commonwealth Office's Forced Marriage Unit by

telephoning 0207 008 0151 or emailing fm@fco.gov.uk. Further guidance may be found here: [Forced marriage - FCO Guidance](#)

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.

g) Modern Slavery and the National Referral Mechanism (NRM)

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance [here](#).

h) Children Requiring Mental Health Support

The School plays a key role in supporting the emotional health and wellbeing of students. In some cases, mental ill-health can be an indicator of abuse and Whitgift has clear procedures on how to access the appropriate support for these children.

More information can be found in [here](#) and in the School's Mental Health Policy and Guidance. Children who have experienced abuse and Adverse Childhood Experience (ACEs) through traumatic events are likely to be impacted. Only appropriately trained professionals should make diagnoses. The additional documents listed below may assist in supporting children and young people. See [Rise Above](#) for links to all materials and lesson plans.

Guidance and policies relating to a range of topics can be found on the [CSCB website](#).

4. Online Safety

As part of the School's duty to provide a safe learning environment, it ensures that students 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:

1. Content

being exposed to illegal, inappropriate or harmful content e.g. pornography, fake news, racist, misogynistic, self-harm, suicide, anti-Semitic, radical and extremist content.

2. Contact

being subjected to harmful online interaction with other users e.g. peer pressure, commercial advertising and adults posing as children or young adults for the purposes of grooming children

3. Conduct

personal online behaviour that increases the likelihood of, or causes, harm e.g. making, sending and receiving explicit images, sharing others explicit images and online bullying.

4. Commerce

risks such as online gambling, inappropriate advertising, phishing and or financial scams. (If students or staff are at risk, it should be reported 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 school child protection, behaviour policy and bullying policies.

The governors should be doing all that they reasonably can to limit children's exposure to the above risks from the School's IT system.

Students 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](#)

The School is aware that some students may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, children's social care or other agencies in order to overcome problems or keep them safe. Educating children and young people to stay safe online is crucial in the modern world. Other websites that can assist are:

[Be internet legends](#)

[PSHE Association](#)

[ThinkUKnow](#)

[Safer Internet centre](#)

[360 Safe Website](#)

Remote Learning

Remote learning is not part of the School's current practice, however, the DfE has provided advice to support schools and colleges do so safely. The NSPCC and PSHE Association also provide helpful advice.

Filtering and Monitoring

KCSIE states that "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's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or

college has appropriate filters and monitoring systems in place. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs vs 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.

The School adheres to the DfE [Filtering and Monitoring Standards](#) in order to fulfil its duties.

The School will

- identify and assign roles and responsibilities to manage filtering and monitoring;
- review filtering and monitoring provision at least annually;
- block harmful and inappropriate content without unreasonably impacting teaching and learning;
- have effective monitoring strategies in place that meet their safeguarding needs.

Further guidance on filtering and monitoring can be found [here](#).

Reviewing Online Safety

Due to ever-evolving technology and associated risks, the School is aware of the rapid changes and regularly reviews its approach to online safety. KCSIE provides the following advice which the School observes: “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 is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include the categories listed below.

- Unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded.
- Denial of Service (Dos or DDoS) attacks or ‘booting’. Attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources. and,
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offences, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead or a Deputy should consider a referral to the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. 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. Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and CSE, nor other areas of concern such as on-line bullying or general on-line safety. Additional guidance can be found at [Cyber Choices](#), at [NPCC- When to call the police](#) and at [National Cyber Security Centre](#).

5. Looked-After and Previously Looked-After Children and Care Leavers

The school recognises that looked-after and previously looked-after children and care leavers are particularly vulnerable due to their status and their pre-care experiences.

The school's designated member of staff for LAC and care leavers is Reverend Alan Bayes. He has specialist knowledge of the issues faced by this cohort and for this reason, the Designated Safeguarding Lead will consult with the designated member of staff to seek advice, whenever there are concerns about the welfare of a looked-after or previously looked-after child or care leaver.

The Virtual School Head is the lead officer for ensuring that arrangements are in place to improve the educational experiences and outcomes of a local authority's looked-after children, including those placed with other authorities. More information about supporting children who are looked after in achieving their potential can be found in [Promoting the Education of Looked-After Children](#).

Additional procedures

The School is aware of the 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 a special guardianship order. It is recognised that these children may face the same difficulties and have the same vulnerabilities as looked-after children.

The School also considers the potential vulnerability of relevant children. These are children who, under the Leaving Care Act, are aged 16 to 17 and who were, but are no longer, looked after.

Many looked-after young people in Croydon who are aged 16 and 17 who remain looked after may be living in semi-independent accommodation and are particularly vulnerable to a wide range of safeguarding issues. It is imperative that the Designated Safeguarding Lead links with the designated LAC staff member where safeguarding concerns are raised.

6. Children who are lesbian, gay, bi, or trans (LGBT)

Children being LGBT is not a safeguarding concern in and of itself, but it is important to be aware that these children can be targeted by others, thus increasing their vulnerability. It is important to consider helping LGBT children to identify a trusted adult who they can talk to, as well as provide safe places within school to talk about their concerns. The School's LGBT+ Inclusion Lead and the Junior and Senior QueerSocs provide support for LGBT students at Whitgift.

LGBT inclusion 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, and teaching about this is included in the School's 'Ideatum' (PSHEE) curriculum.

7. Children with Special Education Needs and Disabilities (SEND)

The School is aware that children with special education needs may be more vulnerable to harm and abuse and may be more likely to experience bullying.

They can face additional safeguarding challenges because

- 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 can be disproportionately impacted by things like bullying without outwardly showing any signs
- difficulties may arise in overcoming communication barriers
- there may be a higher risk of peer group isolation

School policies reflect these issues and recognise that staff need to be able to help this group to overcome barriers to seeking help. The school will identify students who might need more support to be kept safe or to keep themselves safe. Further information can be found here:

- [SEND Code of Practice 0 to 25 years](#)
- [Supporting Pupils at School with Medical Conditions](#).

The Croydon Special Educational Needs and Disabilities Information and Support Services ([SENDIASS](#)) offers information, advice and support for parents and carers of children and young people with SEND.

8. Privately Fostered Children

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative' for 28 days or more. Examples of close relatives are aunts, uncles and grandparents. Those who are not 'close relatives' include cousins, great-aunts and neighbours. The School must notify Croydon of any student it knows to be privately fostered. The Designated Safeguarding Leads should refer to MASH any private fostering arrangements that come to their attention.

Why are children in private foster care?

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family;
- host families for language schools;
- parental ill-health;
- where parents have moved away, but the child stays behind e.g. to stay at the same school to finish exams;
- teenagers living separately from their own family;
- children brought from outside the UK with a view to adoption; or
- children at independent boarding schools who do not return home for holidays and are placed with host families.

Are children in private foster care defined as 'Looked after Children'?

No, the term 'Looked after Children' means children who are looked after by the Local Authority (LA). Privately fostered children are outside the care of the LA. Schools should not therefore code children in private foster care as 'LAC'.

Children staying with host families (homestay)

Students may have arrangements in place for them to have learning experiences by staying with a 'host family' who are not related. This can be part of a foreign exchange visit and it is known as a 'homestay' arrangement. Appendix E of KCSIE 2023 has further information about this. In some cases, where the family is within the UK, this could amount to private fostering under the Children's Act 1989.

9. Young Carers

If the School has a concern about a student they believe to be a young carer, it can contact the Young Carers Service on 0208 649 9339. Further details can be found on their website [here](#).

10. Fabricated or Induced Illness

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

11. Homelessness

Being homeless or being at risk of becoming homeless presents a significant risk to a child's welfare. 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 legal duty on English councils so that 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.

12. 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 provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. Information may be found [here](#).

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 and young people [here](#).

Making child arrangements via the family courts, following separation, can be stressful and entrench conflict in families. This can be particularly worrying for children. The Ministry of Justice has published some helpful resources here:

- [For 5 to 11-year-olds \(as Whitgift begins at Year 6\)](#)
- [For 12 to 17-year-olds](#)
- [On child arrangements](#)

13. Non-collection of children from school

As some students start Whitgift in Year 6, the School does give consideration to the potential vulnerability of its youngest students. Where children are regularly uncollected or collected late, this is discussed with the Designated Safeguarding Lead. If there are also child protection concerns, a referral will be made to MASH.

14. Children who are absent from education

The School's Attendance Officer monitors those children who are persistently absent. The School is aware of students who are absent for prolonged periods and/or on repeated occasions as this may be an indicator of welfare concerns. Multi-agency working is essential when children are absent and potentially at greater risk of harm. This includes liaising with social workers, where a child is on a child in need or child protection plan or is looked after by the local authority. The School pays due regard to Page 45 of KCSIE, which provides recommendations under 'Guidance on school attendance: Working together to improve school attendance'.

Elective Home Education (EHE)

Many home-educated children have an overwhelmingly positive learning experience. The School would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Under the Education (Student Registration) (England) Regulations 2006, the School must inform the Local Authority when a child is taken off roll. Where a parent/carer has expressed their intention to remove a child from the School with a view to educating at home, the School will work with the Local Authority and other key professionals to coordinate a meeting with parents/carers, where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

DfE guidance for Local Authorities on EHE sets out the role and responsibilities of Local Authorities and their powers to engage with parents. Although this is primarily aimed at Local Authorities, the School will familiarise itself with [this](#) guidance, when necessary.

Opportunities to Teach Safeguarding

The governors should ensure that the School provides opportunities for children to learn about safeguarding. At Whitgift, this is verified through the Education and Welfare Subcommittee, which is

chaired by Aaron Porter. General issues may be addressed through the broad and balanced curriculum already in the School but key concerns relevant to the School community and sensitive issues may be taught through Relationships and Sex Education (RSE). In addition, as a boarding school, Whitgift is mindful of its responsibility to provide enhanced education on relationships to boarding students, such as teaching on consent.

In writing the curriculum for RSE, which forms part of 'Ideatum' (PSHEE) at Whitgift, the School has shown due regard to all of the statutory requirements and government guidance. The following resources are also helpful:

[Teaching about relationships sex and health](#)

[DfE advice for schools: teaching online safety in schools](#)

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

[UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

[UKCCIS 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: Thinkuknow](#)

The Child's Wishes

The best interests of the child should always be at the heart of any decision-making process around safeguarding. The governors and the Senior Leadership Team should always make sure the child's wishes and feelings are taken into account when decisions for support are made, and actions taken.

PART 2 The Role of the John Whitgift Foundation as Proprietor

As proprietor and governing body, The John Whitgift Foundation fully undertakes and recognises its statutory and regulatory duties relating to each of the three Foundation schools: Trinity School of John Whitgift, Old Palace of John Whitgift School, and Whitgift School. The Foundation has extensive statutory and regulatory duties beyond those relating to its three schools in the form of care homes and other significant commercial interests. Therefore, to support the Court of Governors of the John Whitgift Foundation (the 'Court') in fulfilling the Foundation's statutory and regulatory responsibilities, each of the three Foundation schools has its own School Governing Committee, of which at least four members are Court Governors, including the Chairman. The Head of each school reports directly to the Chairman of the School Committee and it is the School Committee that has direct oversight of the School and its performance. Each of the three school committees, supported by sub-committees, are charged (without the Foundation delegating its responsibilities) to review in detail and monitor all statutory and regulatory requirements and report back to the Court, which meets four times a year, via the Chairman of the School Committee and the submission of School Committee minutes, so that the Court can consider and oversee any matters arising and deal with them as appropriate. A Court Governor will be appointed to take lead responsibility for safeguarding arrangements on behalf of The John Whitgift Foundation and this appointment will be reviewed annually by the Court. Staff are inducted thoroughly and have read the relevant policies and procedures, including the School's Safeguarding and Child Protection Policy and Keeping Children Safe In Education so that they are fully aware of their role in safeguarding children and are able to fully implement policies.

PART 3 Safer recruitment

General Principles

The school recognises safer recruitment practices are an essential part of creating a safe environment for children and will ensure that staff working at Whitgift are suitable to do so and do not pose any risk to children.

The school is aware of the following central government 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](#)

As an independent school, Whitgift **must** record details of the section 128 checks undertaken for those in management positions.

Please refer to the School's Safer Recruitment Policy for more information.

PART 4 Safeguarding Concerns and Allegations Against a Member of Staff

Conduct and safe teaching practice

- The School expects staff and volunteers to set a good example to students 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 Headmaster will ensure that there is a written Staff Code of Conduct in place and that each member of staff, including volunteers, signs a code of conduct agreement on appointment that sets out the School's expectations with regards to 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 body.
- Staff will be expected to follow the School's Social Media and Acceptable Use Policies in terms of their use of social media, particularly in relation to professional standards and relationships with students and/or their families. All staff and volunteers will sign an acceptable use agreement before being given access to the School computer system.

In the event that an allegation is made against a member of staff or volunteer, the School will follow Croydon's procedures for managing allegations against a member of staff.

[The Management of Allegations against Staff who work with Children and Young People](#)

The governing body will appoint the Headmaster as the School's Designated Manager for the purposes of the allegations procedures. He may delegate this responsibility to a suitably experienced and senior member of staff. Either the Headmaster or his delegated deputy will link with the Local Authority Designated Officer (LADO) for all allegations raised.

All allegations in relation to staff members will be referred to the Headmaster. Allegations against the Headmaster will be referred to the Chair of Governors.

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; or
- 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 the School, making them unsuitable to work with children. This is known as 'transferable risk'. Where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken. Such assessments should be completed in conjunction with the LADO.

This applies to any child the member of staff/volunteer has contact with during their personal, professional or community life. 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(s) took place, brief details of what happened, what was said and who was present. This record should be signed, dated and promptly passed on to the Headmaster. If the concerns are about the Headmaster, the Chair of Governors should be contacted.

The Headmaster, or his deputy, will always consult the LADO promptly after the school is made aware of an allegation.

Following consultation, the LADO in agreement with Headmaster will decide on appropriate action and consider:

- an immediate risk assessment;
- immediate referral to the Police;
- consideration of disciplinary proceedings; and
- consideration of a senior strategy meeting.

Looking after the welfare of the child

The Designated Safeguarding Lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the Local Authority and to children's social care, as described in Part one of this policy.

Investigating and supporting the person subject to the allegation

The case manager (who may be the Headmaster or his deputy) 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 student, other students may also be at risk. The procedures in "Safeguarding Children and Safer Recruitment in Education" (DfE, 2006 – Updated 2011), Working Together to Safeguard Children (July 2018) and Guidance for local authorities, head teachers, school staff, governing bodies and proprietors of independent schools" (DfE 2011) will be followed in such cases.

When appropriate (*see guidance above*), consideration will be given to referral of a member of staff to the DBS 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 Local Authority Designated Officer (LADO) to give support and direction on how to proceed.

All procedures set out in Part 4 of KCSIE 2023 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 on GOV.UK.

Concerns that do not meet the harm threshold – 'Low Level Concerns'

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.

Allegations Against Staff and Volunteers, including supply staff

The School has a Staff 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. The School also has a Low Level Concerns Policy which includes the need for “low-level” concerns to be discussed with the LADO and for them to be recorded.

The governors will ensure that policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold set out above. These could include suspicion, complaint, or disclosure made by a child, parent, or another adult within or outside of the School, or as a result 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.

Low level concerns

As part of their whole-school approach to safeguarding, the School promotes an open and transparent culture in which all concerns about all adults working in or on behalf of Whitgift (including supply teachers, volunteers and contractors) can be raised and are dealt with promptly and appropriately. Creating an environment in which all concerns about adults or their behaviour towards children (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This should enable the School to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse, and ensure that adults working in or on behalf of the School are clear about professional boundaries.

What is a low-level concern?

The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in paragraph 355 of KCSIE 2023. A low-level concern is any concern – no matter how small and even if no more than causing a sense of unease – that an adult working in or on behalf of the School may have acted in a way that is not quite right. This may be that they are contravening the Staff Code of Conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered by the LADO to be serious enough to consider a referral. Ensuring that such concerns are dealt with effectively should also protect those working in or on behalf of the School from potentially false allegations or misunderstandings.

Low level concerns should be shared on a ‘need to know’ basis, as with any other confidential records, and held for future reference, in order to identify any potential patterns of inappropriate behaviour. All records should be kept securely and confidentially and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation.

Please refer to the School’s Low Level Concerns Policy for full details.

Whistleblowing

The School fosters a culture of openness in line with the “Freedom to speak up” review and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children or poor practice within the School that may cause a risk to children.

The School recognises that there may be circumstances where staff and students feel unable to raise concerns or incidents of malpractice within the School environment as there is reasonable doubt that these would be dealt with adequately.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or the School are failing to safeguard and promote the welfare of children.

Where it is not possible to raise concerns within the School, 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 student
- The following numbers can be used where there are issues regarding the School's overall procedures around safeguarding
 - Croydon Council's confidential whistle blowing email address: schoolwhistle@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 Headmaster is responsible for ensuring that these numbers are advertised on the School premises and made available to staff and students.

- The CSBC has an [escalation policy](#) which can be used by staff in school settings

Behaviour management, physical intervention and reasonable force

The School will put in place a behaviour management policy, which has been agreed by the governors, which follows government guidance, and any use of physical intervention and restraint will be linked to the implementation of this policy.

There are occasions where it may be appropriate for staff in the School to use reasonable force in order to safeguard students. The term 'reasonable force' is used to define an action where staff will need to intervene in order to prevent injury or violence. Guidance for the School can be found [here](#). It is believed by the department that a 'no-contact' policy leaves staff at risk of being unable to fully safeguard students in extreme circumstances.

Physically handling children with SEND or medical needs requires further consideration as their additional needs make them more vulnerable. Individual behaviour plans are a way of planning ahead for such eventualities and allow parents to work with staff in constructing a plan that meets the individual needs of the student and provides a plan for all staff to be familiar with.

The School keeps a record of incidents of Reasonable Force.

Music tuition

It is recognised that music teachers are vulnerable to allegations being made against them because they often work with children alone and the activity can involve some physical contact with a child.

Music teachers need to be aware of the possibility of their conduct and behaviour, including physical contact, being misinterpreted by a child or taken out of context by other adults and:

- ensure they behave in an appropriate manner and maintain professional boundaries at all times
- only use physical contact as necessary within the context of the activity, for example as a means of demonstrating technique, and only for as long as needed
- make sure any physical contact cannot be misinterpreted by a child, by explaining in advance what contact will be involved and why
- ask the child's permission first and respect their wishes
- report any incidents or issues that arise to the appropriate member of staff and make sure a record is taken
- never travel alone with children in a car

- use school communication systems to rearrange lessons or rehearsals, or make contact through other staff or parents, wherever practicable

The School will:

- carry out a risk assessment around providing music tuition, including providing rooms/spaces that are adequately safe and open locations where the teacher can be easily observed by others (for example, a door with glass in it)
- passing on any relevant information about children that may have a bearing on how they could react to physical contact so the teacher can adapt their practice accordingly
- let parents know when they arrange tuition what level of physical contact may take place as part of the activity
- record any reported incidents or issues and deal with these within the framework of the School's own policies
- make sure music tutors are aware of the School's safeguarding and staff conduct policies prior to starting

Annex 1: The Role of the Designated Safeguarding Lead

The role of the Designated Safeguarding Lead and their deputies is to take lead responsibility for safeguarding and child protection (including online safety) within the School 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 **Senior 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 Headmaster 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 Policy is up to date and consistent with Croydon's Safeguarding Children Board policies, and that the policy is reviewed at least annually
- ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them. These include KCSIE Part 1, the School's Staff Code of Conduct, the School Safeguarding and Child Protection Policy including the Annexes to this policy and relevant behaviour policies and procedures. 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 Headmaster 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 School's Designated 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 disabilities, and liaise with the Head of Learning Support when considering any safeguarding action for a child with special needs and disabilities
- liaise with the designated member of staff for Looked After Children or Children with Care Experience whenever there are safeguarding concerns relating to a looked after child or previously looked after child

- oversee child protection systems within the school, including the management of records, standards of recording concerns and referral processes
- provide a link between the school 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, at least every 2 years
- ensure parents are fully aware of the relevant School policies and procedures and that they are kept informed and involved
- ensure that all records are kept up to date and stored securely, noting that it is good practice 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 for 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 2023. It is important that the DSL and DDSLs are fully aware of their role and have capacity to carry out all areas of this.

Annex 2: 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• Developmental delay• Attachment difficulties with parents and others• Withdrawal and low self-esteem
Indirect indicators of abuse and neglect	<ul style="list-style-type: none">• 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
Parental attributes	<ul style="list-style-type: none">• Misusing drugs and/or alcohol• Physical/mental health or learning difficulties• Domestic violence• Avoiding contact with school and other professionals

Annex 3: Actions where there are concerns about a child (p.22 KCSIE Sept 2023)



