

WHITGIFT SCHOOL

SAFEGUARDING AND CHILD PROTECTION POLICY

Colleagues responsible for this policy:

Ally Tiltman-Phillips (Director of Safeguarding/Designated Safeguarding Lead, DSL)

Email: a.tiltman-phillips@whitgift.co.uk

Toby Seth (Headmaster)

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Key Contacts (Whitgift School)

<p>Headmaster Toby Seth tds@whitgift.co.uk</p>
<p>Director of Safeguarding/Designated Safeguarding Lead (DSL) Ally Tiltman-Phillips a.tiltman-phillips@whitgift.co.uk Tel. 020 8688 9222 ext. 2778 Mob. 07525 848709</p>
<p>Deputy Designated Safeguarding Leads (DDSLs) Rachel Attenborough (Senior Deputy) rra@whitgift.co.uk Oz Bhatti (Assistant Head, Student Welfare) oab@whitgift.co.uk Adrian Norris (Assistant Head, Pastoral & Boarding) adn@whitgift.co.uk Faye Carter (Director of Sixth Form) fec@whitgift.co.uk Ross Munro (Director of Middle Years) rim@whitgift.co.uk Kerry Mason (Director of Junior Years) kmm@whitgift.co.uk Alistair Watkins (Deputy Director of Safeguarding with responsibility for Prevent) agw@whitgift.co.uk</p>
<p>Designated Member of Staff for Looked After Children and Children with Care Experience Ally Tiltman-Phillips a.tiltman-phillips@whitgift.co.uk</p>
<p>Safeguarding Governor to the School Andy Hulme Safeguarding.Governor@whitgift.co.uk</p>
<p>Safeguarding Governor to the Foundation Mike Gascoigne MGE@johnwhitgiftfoundation.org</p>
<p>Chairman of the Whitgift School Governors Nick Edwards NES@johnwhitgiftfoundation.org</p>
<p>Chairman of the Court of Governors of The John Whitgift Foundation Fiona Fletcher-Smith Contact (via The Clerk) 020 8680 8499</p>
<p>Key Contacts: Out of School Hours</p>
<p>Rachel Attenborough Mob. 07761 037316 Adrian Norris Mob. 07825 383136</p>

Key External Contacts (London Borough of Croydon)

Croydon Safeguarding Children Partnership (CSCP)



Croydon Safeguarding Children Partnership (CSCP)

Website: <https://www.croydonsafeguarding.org/>

Email: CSCP@croydon.gov.uk

Tel: 0208 604 7275

Local Authority Designated Officer (LADO)

lado@croydon.gov.uk

schoolwhistleblowing@croydon.gov.uk

LADO: Jane Rowe

Email: jane.rowe@croydon.gov.uk

Tel: 0208 726 6000 (Ext. 84343) Mob: 07716092630

MASH (Multi-Agency Safeguarding Hub)

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

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

MASH Service Manager: Phillip Larmond

Email: phillip.larmond@croydon.gov.uk

Croydon Prevent

Croydon Prevent Co-Ordinator

Haydar Muntadhar

haydar.muntadhar@croydon.gov.uk

Tel: 0208 726 6000 (ext. 62070)

Croydon Safeguarding Adults Board (SAB)

<https://www.croydonsab.co.uk/>

csab@croydon.gov.uk

Tel: 020 8726 6500

Other External Contacts | Helplines

Whistleblowing NSPCC Whistleblowing Advice Line Tel. 0800 028 0285 (8am – 8pm Mon-Fri) help@nspcc.org.uk
Domestic Abuse Operation Encompass Helpline Tel. 0204 513 9990 (8am – 1pm Mon-Fri)
Disclosure and Barring Service (DBS) DBS Customer Services, PO Box 3961, Royal Wootton Bassett SN4 4HF Tel. 03000 200 190 customerservices@dbs.gov.uk
Teaching Regulation Agency Teacher Misconduct Ground Floor South, Cheylesmore House, 5 Quinton Road, Coventry CV1 2WT Tel. 0207 593 5393 misconduct.teacher@education.gov.uk
Female Genital Mutilation (FGM) Police - 999 (for emergencies) www.gov.uk/contact-police NSPCC FGM free phone helpline 0800 028 3550
NSPCC Report Abuse in Education Advice Line Tel. 0800 136 663 help@nspcc.org.uk
Online Safety UK Safer Internet Centre Tel. 0344 381 4772 helpline@saferinternet.org.uk
Independent School Inspectorate (ISI) Tel. 0207 6000 100 concerns@isi.net
The Boarding Schools' Association (BSA) Tel. 02077981580 Web: www.boarding.org.uk

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1. Introduction

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) all schools and colleges in England **must** have arrangements in place to safeguard and promote the welfare of children.

Whitgift School is committed to provide a safe and welcoming environment where children are respected and valued. The School will therefore be alert to signs of abuse, neglect and exploitation and will follow the Croydon Safeguarding Children Partnership procedures to ensure that children receive appropriate and effective support and protection.

It is essential that **everybody** working at Whitgift School understands their safeguarding responsibilities, has a child centred approach and considers at all times what is in the best interests of the child to enable them to have best outcomes. No single person or agency can hold the full picture for a child's needs and circumstances.

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 identifying concerns, sharing information and taking prompt action. 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.

This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve **everyone** at the School to ensure that the best interests of students underpins and is at the heart of all decisions, systems, processes and policies.

Although this policy is necessarily detailed, it is important to the School that its safeguarding policies and procedures are transparent, clear and easy to understand for staff, volunteers, governors and parents. It emphasizes the importance of early intervention, effective communication and collaboration with external agencies to ensure that all students receive the support they need.

2. Aims

The aims of this policy are to:

- actively safeguard and promote the wellbeing of students and protect them from harm.
- promote a whole school culture of safety, equality and protection.
- 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 and are competent to carry out their safeguarding responsibilities and feel supported in this role.
- raise staff awareness about the School's safeguarding expectations, how to report concerns and ensure they are appropriately investigated.
- have clear procedures in place for dealing with and referring concerns about the welfare of any individual and allegations of abuse, neglect and/or exploitation to relevant agencies.
- ensure that members of the school community feel able to raise any safeguarding concern, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively and appropriate action taken.
- make sure that anyone about whom a concern is raised feels confident that they will be supported and the matter be handled sensitively and that appropriate action will be taken.
- ensure that links with relevant agencies are effective, including working in partnership with the Croydon Safeguarding Children Partnership (CSCP) regarding child protection matters.
- ensure the school environment is safe and is one in which students feel safe and secure and are encouraged to talk freely about anything that concerns them.

- ensure students know there are adults in School whom they can approach if they are worried about anything.
- ensure consistent good safeguarding practice throughout the School to include the promotion of a zero tolerance approach to child-on-child sexual violence and harassment in which students are confident to report it and staff are confident to identify and respond to it.
- ensure the curriculum and other provision, including opportunities in the Ideatum 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 the School responds appropriately to any concern or allegation about a member of staff or volunteer.
- 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.

All staff should understand the indicators of abuse, neglect and exploitation and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks are set out in Appendix 3.

3. Scope and Application

This policy applies to the whole School and at all times including where students or staff are away from the School, whether they are on school-arranged activities or otherwise, and whether or not the School is open. It will therefore apply out of school hours and in the holidays.

This policy applies to core School activities and to out of hours and commercial activities.

4. Regulatory Framework

This policy has been prepared to meet the School's responsibilities under:

- Charities Act 2011
- Children Act 1989
- Children Act 2004
- Children and Social Work Act 2017
- Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
- Education (Independent School Standards) Regulations 2014
- Education and Skills Act 2008
- Equality Act 2010
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006

This policy has regard to the following guidance and advice:

Statutory Guidance:

- [Channel Duty Guidance: Protecting People Susceptible to Radicalisation](#) (October 2023)
- [Children Missing Education](#) (DfE, August 2024)
- [Disqualification under the Childcare Act 2006](#) (DfE, August 2018)
- [Keeping Children Safe In Education](#) (DfE, September 2025)
- [Multi-Agency Statutory Guidance on FGM](#) (HM Government, July 2020)
- [PACE Code C 2019](#)
- [Prevent Duty Guidance for England and Wales](#) (HM Government, December 2023)

- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education Guidance](#) (DfE, September 2021 and 2025)
- [Working Together to Improve School Attendance](#) (DfE, August 2024)
- [Working Together to Safeguard Children](#) (HM Government, December 2023)

Non-Statutory Guidance:

- [After-School Clubs, Community Activities and Tuition: Safeguarding Guidance for Practitioners](#) (DfE, 2023)
- [Behaviour in Schools: Advice for Headteachers and School Staff](#) (DfE, February 2024)
- [Croydon Safeguarding Children Partnership Threshold Guidance](#)
- [Information Sharing: Advice for Practitioners Providing Safeguarding Services](#) (DfE, May 2024)
- [Harmful Online Challenges and Online Hoaxes](#) (DfE, February 2021)
- [How to Report a Serious Incident in your Charity](#) (Charity Commission, June 2019)
- [Managing the Risk of Radicalisation in your Education Setting](#) (DfE, September 2023)
- [Meeting Digital and Technology Standards in Schools and Colleges](#) (DfE, maintained)
- [Safeguarding and Protecting People for Charities and Trustees](#) (Charity Commission, June 2022)
- [Searching, Screening and Confiscation: Advice for Schools](#) (DfE, September 2022)
- [Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People](#) (DSIT/UKCIS, March 2024)
- [Teaching Online Safety in Schools](#) (DfE, January 2023)
- [What to do if you're worried about a Child being Abused](#): Advice for Practitioners (HM Government, March 2015)

This policy also takes into account the procedures and practice of Croydon Council as part of the multi-agency safeguarding arrangements set up by the Croydon Safeguarding Children Partnership.

This policy should be read alongside other relevant policies including:

- Anti-Bullying Policy
- Attendance and Registration Policy
- Behaviour, Discipline and Exclusions Policy
- Low-Level Concerns Policy
- Mental Health and Wellbeing Policy
- Missing Student Procedure
- Online Safety Policy
- Reasonable Force Policy
- Relationships Education (RE) and Relationships and Sex Education (RSE) Policy
- Safer Recruitment Policy
- Searching a Student Policy
- Social Media and Communication Policy
- Staff and Visitor Acceptable Use Policy
- Staff Code of Conduct
- Visitors Policy
- Whistleblowing Policy

5. Definitions

For the purpose of this policy, the following definitions apply:

- **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Please refer to Appendix 3 of this policy for further details and explanations.

- **Children** includes everyone under the age of 18 (KCSIE 2025). KCSIE also applies to providers of post-16 education as set out Education and Training (Welfare of Children) Act 2021. Thus, all students educated at Whitgift School are covered by this policy and the terms “children” and “young people” will be applied to them.
- References to **Children’s Social Care** includes, depending on the context, the team based in the local authority where the School is located (Croydon) and, where appropriate, the team based in the local authority where the student is resident.
- **DSL** means the School’s Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.
- **Harm** refers to any action or behaviour that negatively impacts a child’s wellbeing or development. This includes physical, emotional, sexual harm, neglect, or any mistreatment that affects the child’s health and safety. Please also refer to Appendix 3 for further clarification of the definition.
- **LADO** means designated officer at the local authority. The LADO has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues and for liaison with the three safeguarding partners.
- **Local Safeguarding Partners** means the three safeguarding partners (local authority, Integrated Care Systems ICSs, police) who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.
- **Neglect** is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 3 defines neglect in more detail.
- **Parent** refers to any person with legal responsibility for a child, including biological parents, adoptive parents, guardians and foster carers.
- **Safeguarding** is the protection of people from harm.
- **Staff** include all those who work for or on behalf of the School, regardless of their employment status, including contractors, supply staff, volunteers and governors unless otherwise indicated.

The word ‘**must**’ is used when a member of staff is required to do something. This may relate to a legal duty, such as the sharing of information with Children’s Social Care. The word ‘**should**’ is used when the guidance set out should be followed unless there is good reason not to.

6. Equality Statement

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

7. Key Principles for Safeguarding and Promoting the Welfare of Children

Safeguarding is about every child. Safeguarding and promoting the welfare of children is **everyone’s** responsibility. It is defined in Working Together to Safeguard Children as:

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether that is within or outside home, including online.
- preventing the impairment of children’s mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.

The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.

Whitgift School will:

- understand its role in the safeguarding partner arrangements and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the Croydon Safeguarding Children Board (CSCB).
- be alert to signs of abuse, whether in School, within the child's family or outside, both in the School and from outside and take steps to protect individuals from any form of abuse, neglect or exploitation, whether from an adult or another child (see Annex 3/4/5).
- include opportunities within the curriculum for children to develop skills they need to recognise and stay safe from abuse.
- take active steps to promote School attendance in line with statutory guidance.
- promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback.
- deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and/or welfare plans.
- be alert to children who are at potentially greater risk of harm (both online and offline) including children who need a social worker or require mental health support.
- encourage a culture of listening to students and victims of abuse and taking into account their wishes and feelings in any measure put in place and actions taken by the School to protect them.
- prepare staff to identify children who may benefit from Early Help (see paragraph 14.3).
- design, operate and follow procedures which, so far as possible, ensure that staff, students and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations.
- operate robust and sensible health and safety procedures (see Appendix 9) and operate clear and supportive policies on drugs and substance misuse.
- assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area.
- identify students who may be susceptible to extremist ideology and radicalisation or might be vulnerable to being drawn into county lines or other gang activities.
- consider and develop procedures to deal with any other safeguarding issues which may be specific to an individual student or the local area.

8. The School's Approach to Safeguarding Leadership

8.1 Governing Board Responsibilities

The Governing Board has overall responsibility for all matters which are subject of this policy including:

- legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of students at the School, having regard to relevant guidance issued by the Secretary of State;
- strategic leadership responsibility of the School's safeguarding arrangements; and
- specific responsibilities to facilitate a whole school approach to safeguarding set out in more detail in Part 2 of KCSIE.

The Governing Board:

- has appointed one of its members to take leadership responsibility to the School's safeguarding arrangements (Nominated Safeguarding Governor). The contact details of the Nominated Safeguarding Governor are listed in the School contact list at the beginning of the policy.
- ensures that suitable arrangements are in place for the whole Governing Board to discharge their function, including giving due consideration to safeguarding matters during meetings and conducting an annual review of safeguarding (including policies and procedures and their implementation).
- establishes appropriate delegation arrangements at School level to enable the School to discharge its safeguarding duties effectively (For example, the responsibility to keep the policy up to date, ensuring compliance and best practice, has been allocated to the Director of Safeguarding/DSL).
- ensures that all members of the Governing Board receive appropriate safeguarding and child protection training (including online safety) in line with KCSIE and Croydon Safeguarding Children Partnership (CSCP), both on induction and through regular updates.

Please refer to Appendix 1 for further information about Governing Board responsibilities.

8.2 Headmaster Responsibilities

The Headmaster:

- is responsible for the overall management of the School and for the management of concerns and allegations about staff.
- ensures that the School's policies and procedures, adopted by the Governing Board, are understood and followed by all staff.

Please refer to Appendix 1 for further details of the Headmaster's responsibilities.

8.3 Designated Safeguarding Lead (DSL) Responsibilities

The Director of Safeguarding/Designated Safeguarding Lead (DSL):

- is a member of the Senior Leadership Team with the necessary status and authority to take lead responsibility and overview for all aspects of safeguarding and child protection (including online safety and understanding the filtering and monitoring system and processes in place) throughout the School.
- has the appropriate status and authority within the School to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and/or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the School contacts list at the front of this policy.
- will also liaise with the Headmaster to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult.
- will take lead responsibility for students who are looked after children. Direct support will be delegated to the teacher designated for looked after children.
- takes lead responsibility for all aspects of safeguarding throughout the School and will meet with the Nominated Safeguarding Governor at least termly to discuss recent trends and updates.

If the DSL is unavailable, the activities of the DSL will be carried out by one of the nominated Deputy DSLs. The Deputy DSL's details are also set out in the School contacts list at the front of the policy. The DSL and DDSL have written job descriptions describing the responsibility and activities related to the role.

A detailed role description can be found in Appendix 3 of this policy.

9. 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 having a link to the safeguarding statement on the homepage of the School website [here](#). School policies are available on the website or on request.
- provide opportunities for parents and carers to discuss any problems with tutors, teachers and other relevant staff.
- where appropriate, 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.

Parents are encouraged to address any concerns directly with the School.

10. Multi-Agency Working

The School will work in partnership with relevant agencies to meet its obligations under section 11 of the Children Act 2004 and *Working Together to Safeguard Children 2023*.

The School recognises its vital role in safeguarding 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 educated in Croydon.

When allegations are made against staff, the School will consult with the LADO and, where necessary, the police and children's social care to determine what information should be shared and with whom.

The School will refer to National Police Chiefs Council (NPCC) advice [When to Call the Police](#) for additional guidance on decision making regarding informing the police.

11. Confidentiality and Information Sharing

Safeguarding information about a student will be managed with the appropriate level of confidentiality, shared with others only when deemed necessary.

The School understands the importance of sharing information to identify and address all forms of abuse, neglect and exploitation, as well as to promote children's welfare, including their educational outcome. The Data Protection Act 2018 and UK GDPR do not prohibit the sharing of information when it comes to keeping children safe. As a result, concerns about information sharing will not take precedence over the School's primary duty to safeguard and promote the welfare and safety of children.

No individual practitioner can have a complete understanding of a child's needs and circumstances. When a child is at risk of significant harm, the School recognises its legal duty to share relevant information with children's social care and make required referrals. Likewise, if a child is subject to a child protection investigation, the School will provide any requested information to children's social care.

Parental consent should be sought before making a child protection referral. However, if consent is refused, the referral must still be made, and parents should be informed. Before taking this action, the School should assess

whether the need to safeguard the child outweighs the duty of confidentiality. Parental consent to referral may be waived if seeking consent could result in further harm to the child, interfere with a criminal investigation or cause unnecessary delays in protecting the child. However, the School should consult with the MASH Professionals' Consultation Line on a no-names basis to seek advice on whether this approach is appropriate.

Only relevant information should be disclosed, and only with professionals who require it. Staff should carefully consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the specified purpose.

If a child discloses neglect or abuse, staff cannot promise confidentiality but must explain the reasons for sharing information, who it will be shared with and what the outcome will be. Parents should also be informed of the School's obligation to share such information.

When a child leaves the School (including in-year transfers), their CPOMS record is securely transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of a new term. Confirmation of receipt will be obtained. The Director of Safeguarding/DSL will also assess whether it is appropriate to share any additional information with the new school or college prior to the child's start date. This may assist the new school or college implement the necessary support to safeguard the child and ensure their wellbeing.

Staff should address any concerns or challenges around confidentiality or information sharing with the Director of Safeguarding/Designated Safeguarding Lead, or consult the MASH Professionals' Consultation Line for guidance.

Further information on information sharing can be found here:

DfE | [Information Sharing Advice for Safeguarding Practitioners](#) | 2024

DfE | [Data Protection in Schools – Sharing Personal Data](#)

ICO | [A 10-Step Guide to Sharing Information to Safeguard Children](#)



12. Contextual (Extra-Familial) Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside School, inside and outside home and online.

All staff, particularly the Director of Safeguarding/DSL, should take into account the context in which these incidents and/or behaviours occur. As part of the assessment, the School will evaluate whether there are broader environmental factors in the child's life that could pose a risk to their safety or welfare. The School will share as much relevant information as possible with Children's Social Care during the referral process to ensure that all available evidence and the full context are taken into consideration.

All staff, particularly the Director of Safeguarding/DSL, should assess whether children may be at risk of abuse or exploitation outside their families (extra-familial). Extra-familial harms can take many forms, and children may be vulnerable to multiple harms, including but not limited to sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

13. Children Potentially at Greater Risk of Harm

Whilst all children should be protected, the School recognises that some groups of children are potentially at greater risk of harm than others. Some of these group of children are highlighted in this section.

13.1 Children Educated at Home (Elective Home Education)

Many home educated children have a positive learning experience. We 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.

Where a parent or 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 or carers, where possible. This is to ensure the parents or carers have considered what is in the best interests of the child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

The DfE guidance for local authorities on [Elective Home Education](#) is also a helpful resource for schools.

13.2 Looked After Children and Previously Looked After Children/Care Leavers

The School recognises that looked after children and children with care experience are particularly vulnerable due to their status and their pre-care experiences. The School will work with other agencies including social workers and the Virtual School Head¹ of the local authority ensuring prompt action is taken when necessary to safeguard these children.

The School also considers the potential vulnerabilities of children aged 16-17 under the Leaving Care Act, who are no longer looked after and may be residing in semi-independent accommodation. In such circumstances, the School's Counselling Service Lead is available to provide targeted support.

The School's designated member of staff for looked after children and children with care experience is the Director of Safeguarding/DSL who possesses specialist knowledge of the challenges these children face and is able to offer guidance to other members of staff. The Director of Safeguarding/DSL will liaise with the local authority Personal Advisor who provides support and guidance to care leavers (including children who left the care system through adoption or special guardianship order) regarding any concerns. It is recognised that these children may face similar difficulties and vulnerabilities as looked after children.

More information about supporting children who are looked after in achieving their potential can be found in [Promoting the Education of Looked After Children](#).

13.3 Children who need a Social Worker (Child in Need/Child Protection Plans)

Children may have a social worker due to safeguarding or welfare needs including neglect, abuse, exploitation and/or difficult family circumstances. Their experience can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

When the local authority informs the Director of Safeguarding/DSL that a child has a social worker, decisions will be made in the best interests of the child's safety, welfare and educational outcomes. All staff have a professional duty to support and protect these children.

Further information can be found in the DfE publication [Review of Children in Need](#) and the document [Help, Protection, Education](#).

13.4 Children who are Lesbian, Gay, Bi or Gender Questioning

The School acknowledges that a child's sexual orientation, whether being lesbian, gay or bisexual, does not automatically constitute a safeguarding concern or present an inherent risk of harm. However, it is important to be

¹ The Virtual School Head is the lead responsible 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 outside Croydon.

aware that they may occasionally be targeted by their peers, which can increase the vulnerability of these children. The School endeavours to create a culture where they can speak openly or share their concerns with a trusted member of staff.

When supporting a child who is questioning their gender, the School will adopt a careful approach, taking into account the broad range of the students' individual needs in collaboration with the parents (unless, in the exceptionally rare cases, involving parents would pose a significant risk of harm to the child). This will include considering any clinical advice that is available and addressing broader vulnerabilities, such as the risk of bullying. The School will also refer to the DfE guidance for schools regarding *Gender Questioning Children* (once published) when determining the appropriate course of action.

Families will be encouraged to seek clinical help and advice when making decisions regarding support for gender questioning children.

13.5 Children with Special Educational Needs, Disabilities (SEND) or Health Issues

The School recognises that children with Special Educational Needs and Disabilities (SEND) or certain medical or physical health conditions may face increased risks of harm and abuse and may be more likely to experience bullying. They can face additional safeguarding challenges (both online and offline) for the following reasons:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition 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 and in managing or reporting these challenges.
- There may be a higher risk of peer group isolation or bullying (including prejudice-based bullying).
- The cognitive understanding might be impacted. A child with SEND might be unable to understand the difference between fact and fiction in online content and repeat the content/behaviours in School without consideration of the consequences.

The School's policies reflect these issues and recognise that staff need to support this group to overcome barriers to seeking help. The School will identify students who might need more pastoral support and attention to be kept safe or to keep themselves safe and refer to guidance from the DfE and/or from specialist organisations (NSPCC, Mencap, SENDIASS) as appropriate:

- [SEND Code of Practice 0 to 25 years](#)
- [Supporting Students 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.

13.6 Private Fostering

Private fostering occurs when a child under the age of 16 (or under 18 if disabled) is cared for by someone who is neither their parent nor a close relative (e. g. aunt, uncle, grandparent) for a period of 28 days or more. Cousins, great-aunts and neighbours do not count as close relatives.

The School has a legal duty to inform the local authority of any students known to be privately fostered. Staff should promptly notify the Director of Safeguarding/DSL upon becoming aware of any private fostering arrangements, who will then engage with the family to ensure they understand their responsibility to notify the local authority. The Director of Safeguarding/DSL must refer any private fostering arrangements that come to their attention to the Multi-Agency Safeguarding Hub (MASH).

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 school students
- parental ill-health
- children at independent boarding schools who do not return home for holidays and are placed with host families
- 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.

Some parents make arrangements for their children to have learning experiences by staying with a 'host family' who are not relatives. It can be part of a foreign exchange visit and known as 'homestay' arrangements. In some cases where the family is within the UK, this could amount to private fostering under the Children's Act 1989.

14. Reporting Obligations and Dealing with Concerns

The School has a responsibility to consider at all times the best interests of the student and take actions that help all students achieve the best possible outcomes. Staff have a statutory responsibility to safeguard and promote the welfare of all students and should maintain a mindset of 'it could happen here'. The School follows a whole-school approach to safeguarding which involves the entire School community and ensures that safeguarding and child protection are central to all process and policy developments.

Staff must remember their responsibility to identify those children who are suffering from abuse, neglect or exploitation and ensure that any concerns about the welfare of a student are reported to the Director of Safeguarding/DSL without delay. They should refer to Annex 1 of this policy for indicators that may suggest a student may be at risk of suffering significant harm.

14.1 Reporting a Concern about a Child

A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be in need or at immediate risk of harm as defined by the Children Act 1989.

If staff suspect or hear any allegation or complaint of abuse, exploitation or neglect from a child or any third party, they must act immediately and follow the relevant procedures in this policy to ensure action can be taken to protect the student concerned. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The member of staff must **immediately** report the concern to the Director of Safeguarding/DSL, or the DDSL in the DSL's absence, to agree a course of action.

Staff should be aware that a student may not feel ready or know how to tell someone that they are being abused, exploited, neglected and/or they may not recognise their experiences as harmful (e.g. a child may feel embarrassed, humiliated or being threatened due to their vulnerability, disability and/or sexual orientation or language barrier). Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

If a concern involves an allegation or concern raised about a member of staff, supply staff, contractor or volunteer, this must be reported in accordance with the procedures set out in Appendix 5 and Part 1 and Part 4 of KCSIE 2024.

The School procedures for dealing with concerns about a child are in line with those agreed by the Croydon Safeguarding Children Partnership (CSCP). KCSIE's flow chart setting out the process for staff when they have concerns about a child can be found in Appendix 6.

14.1.1 What if the DSL is unavailable?

The Director of Safeguarding/DSL or one of the DDSLs is always available during School hours to discuss any safeguarding concerns and may be contacted via the numbers given in the 'Key Contacts (Whitgift School)' section above in relation to any safeguarding concerns.

If in exceptional circumstances the Director of Safeguarding/DSL and the DDSLs are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the Senior Leadership Team and/or advice should be sought from the children's social care. Their contact details are set out at the front of this policy.

Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and/or the police should be made immediately. Staff are expected to be aware of the process for making referrals direct to MASH or the police in these circumstances (see section 10.4 below). Any action taken by a member of staff pursuant to this requirement should then be shared with the Director of Safeguarding/DSL, DDSL or a member of the Senior Leadership Team as soon as is practically possible.

14.1.2 Action by the DSL

On receipt of a concern, the Director of Safeguarding/DSL (together with the wider DDSL team where necessary) will consider the appropriate course of action in accordance with the Croydon Safeguarding Children Partnership (CSCP) procedures and the referral threshold document. Such action may include:

- managing support for the student child internally via the School's own pastoral support processes, seeking advice from children's social care where required (see section 10.2),
- undertaking an Early Help assessment (see section 10.3),
- making a referral to statutory services (see section 10.4).

The views and wishes of the child will be taken into account when considering the appropriate course of action but will not be determinative.

Where the concern relates to the welfare of a student who is aged 18 or over, the Director of Safeguarding/DSL will consider whether it is necessary to refer such concerns to the [Croydon Safeguarding Adults Board](#) (SAB) rather than, or in addition to, children's social care.

If it is decided that a referral is not required, the Director of Safeguarding/DSL will keep the matter under review and give ongoing consideration to a referral if the student's situation does not appear to be improving.

14.2 Managing Support for Students Internally

Where the Director of Safeguarding/DSL and DDSLs feel a child can be supported appropriately through internal pastoral processes, these will be put in place to support and monitor the welfare of the child. Internal support can range from a peer mentor through to seeing a counsellor via our counselling service. The DSL will seek advice from external agencies/partners where required.

The School has a framework for the identification, assessment, management and review of risk to student welfare so that appropriate action can be taken to reduce the risks identified.

14.3 Undertaking an Early Help Assessment

As described in the Croydon Partnership Early Help Delivery Plan, Early Help is everyone's responsibility. Early Help, also known as early intervention, is support given to a family when a problem first emerges. The School understands

that it is essential that the needs of children and their families are identified and addressed at the earliest opportunity, before they escalate into more serious problems that might require greater level of intervention. It can be provided to parents, children or whole families and is generally supported by children's social care in consultation with the family.

The School's safeguarding training includes guidance about Early Help processes and prepares staff to identify students who may benefit from Early Help. Staff should be mindful of specific safeguarding issues and those students who may face additional safeguarding challenges. They should be particularly alert to the potential need for Early Help for a child:

- with disabilities, certain health conditions and specific additional needs.
- who has special educational needs (whether or not they have a statutory education, health and care plan).
- showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- at risk of exploitation through modern day slavery and trafficking.
- who is growing up in family circumstances presenting challenges for the child, such as drug or alcohol misuse, adult mental health issues and domestic abuse.
- at risk of so-called 'honour-based abuse' such as Female Genital Mutilation (FGM) or forced marriage.
- who is a young carer.
- who has experienced multiple suspensions, is at risk of being permanently excluded and in Alternative Provision or a Pupil Referral Unit.
- who is frequently missing/goes missing from education, home or care.
- at risk of being radicalised or exploited.
- with mental health needs.
- who is misusing drugs or alcohol.
- at risk of sexual and/or criminal exploitation, modern slavery, trafficking.
- with a parent or carer in custody, or who is affected by parental offending.
- who is a privately fostered child.

If a member of staff considers that a student might benefit from Early Help, they should keep a written record of their concerns and discuss this with the Director of Safeguarding/DSL in the first instance. The Director of Safeguarding/DSL will consider the appropriate action to take in accordance with the Croydon Safeguarding Children Partnership Threshold Guidance. The School will also refer to *Working Together to Safeguard Children* for further guidance on effective assessment of the need for Early Help.

- Where the child's needs require help, consideration will be given to what Early Help support can be offered 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.
- The School will take an open and honest approach to supporting children and families. Where possible, the School will seek a parent's consent to share information to enable them to access the right support, unless to do so a child would be at risk of significant harm and would therefore not be in the best interest of 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 will be monitored and kept under constant review to ensure outcomes for the child are improving. If the School believes that this is not the case or the situation is getting worse, consideration will be given to make a referral to local authority children's social care for assessment for statutory services.

14.4 Making a Referral

Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police²) should be made **immediately**. Anyone can make a referral.

Where possible, a decision on whether to refer a student to MASH should be made by the Director of Safeguarding/Designated Safeguarding Lead (DSL) or the 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. Staff should discuss the matter with a member of the Senior Leadership Team and take advice from the MASH team social worker. The Director of Safeguarding/DSL should be informed as soon as possible.

Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the Director of Safeguarding/DSL may discuss the case with the MASH Professionals' Consultation Line to obtain advice on how to proceed. Alternatively, advice can be sought from the Local Authority Education Safeguarding Lead.

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. 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.

If the child is not already known to children's social care, referrals should be made by completing the [MASH Multi Agency Referral Form](#). Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the portal within 48 hours. If the child already has an allocated social worker, the referral should be made directly to them. If the child lives outside Croydon, a referral should be made to their home local authority.

Children's social care assessments should consider where children are being harmed in contexts outside of 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.

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 under section 47 of the Children Act 1989. The enquiries enable the local authority to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment including abuse, neglect and exploitation.

Confirmation of the referral and details of the decisions as to what course of action will be taken, should be received from the local authority/MASH within one working day. 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 children with disabilities) who are unlikely to meet a reasonable standard of health and/or development unless provided with services.
- Convening a **strategy meeting/discussion under child protection procedures** 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 in the meantime whilst work is ongoing (including details of appropriate services).

² Please refer to NPCC [When to Call the Police: Guidance for Schools and Colleges](#)

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

Following referral, if the child's situation does not appear to be improving within a reasonable timescale, this should be followed up with children's social care by the Director of Safeguarding/Designated Safeguarding Lead.

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

The Director of Safeguarding/DSL will:

- liaise with children's social care to ensure that all relevant information held by the School is provided during the course of any child protection investigation.
- ensure that the School is represented at child protection case conferences and core group meetings. Whenever possible, a member of staff who knows the child best, such as a class teacher or head of year, will be designated to attend. If this is not possible, the Director of Safeguarding/DSL or their deputy will attend. If no representative from the School can be present, the Director of Safeguarding/DSL will ensure that a report is submitted to the conference or meeting.

14.4.2 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 in conjunction with the Director of Safeguarding/DSL;
- all monitoring information will be recorded in CPOMS prior to each conference and core group meeting;
- monitoring information will be kept separate from the child's main school file and copies made available to all conferences and core group meetings; and
- the Director of Safeguarding/DSL will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.

14.5 Responding to a Disclosure made by a Child

The safeguarding concern may be a result of a disclosure made by a child. Staff must:

- listen carefully to what is said without displaying shock or disbelief;
- allow the child to talk freely without interruption;
- remain non-judgemental and keep an open mind;
- avoid asking leading questions. This is particularly important if the student discloses something which suggests to be a criminal offence. In such circumstances the police will need to take the lead on the investigation; further questioning might compromise possible criminal proceedings;
- reassure the child that the allegation/complaint will be taken seriously and that they will be supported and kept safe;
- not promise confidentiality and explain the need to pass on the information in accordance with this policy so that the correct action (e.g. referral to children's social care) can be taken;
- reassure the child that what has happened is not their fault and that they were right to tell someone;
- not criticise the alleged perpetrator;
- be honest with the student and explain what will happen next and who has to be told.
- not take photographs of any physical injuries; if they have seen injuries, these should be recorded on a body map.
- not use audio to record disclosures.

At the earliest opportunity, a factual written record of the conversation should be made and passed on to the Director of Safeguarding/DSL. All other evidence, for example, scribbled notes, mobile phones containing text messages, must be kept securely with the written record. Records should include:

- the student's details including name and date of birth;
- date and time of the event/concern/conversation;
- a clear and comprehensive summary of the event/concern/conversation;
- details of how the concern was followed up and resolved;
- a note of any action taken and by whom with reasons for decisions reached and the outcome;
- the name and position of the person making the record.

Where a student makes a disclosure relating to a family member, parents should not be informed unless advised to do so by the safeguarding team at the children's social care.

14.6 Allegations against Students – Child on Child Abuse

Allegations against students should be reported in accordance with the procedures set out in this policy (see Appendix 4). If harmful sexual behaviour is alleged to have occurred, the Director of Safeguarding will have regard to Part 5 of Keeping Children Safe in Education (KCSIE) and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

All those involved in such allegations, both victim and perpetrator, will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all students involved, including support from external services as necessary.

14.7 Managing Incidents of Nude and Semi-Nude Image/Video Sharing

Sharing nudes and semi-nude images, videos or live streams refers to the sending or posting such content by young people under the age of 18 online. This may occur through social media, gaming platforms, chat apps (incl. WhatsApp) or forums and can also include offline sharing between devices (e.g. via Apple's AirDrop). This is also known as sexting or youth produced sexual imagery and includes the sharing of digitally manipulated or AI-generated nude and semi-nude images. The School regards all incidents of sharing nudes and semi-nude images as safeguarding matters and will address them in accordance with this policy.

Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. All members of staff have a duty to recognise and refer any incidents involving nudes and semi-nudes.

Any direct disclosure made by a child will be taken seriously. Staff must ensure the child feels comfortable and must only ask appropriate and sensitive questions to minimise any additional distress or trauma.

Staff should report the incident to the Director of Safeguarding/DSL as soon as possible. They must not intentionally view, copy, print or share any nude or semi-nude images that are reported to them under any circumstances. When reporting an incident involving image sharing, staff should describe the content of the images as reported to them.

The Director of Safeguarding/DSL will follow the UKCIS guidance [Sharing Nudes and Semi-Nudes \(March 2024\)](#) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and members of the safeguarding team.

- carrying out interviews with the children involved (if appropriate),
- informing parents and carers at an early stage and keep them involved in the process in order to best support the student unless there is a good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police.
- carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

An immediate referral to police and/or children's social care through the MASH or equivalent will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child, the incident may first present as a child-on-child incident.
- There is a reason to believe that a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- The images or videos suggest the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The images involve sexual acts and any child in the images or videos is under 13.
- There is a reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, they are presenting as suicidal or self-harming).

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the Director of Safeguarding/DSL is confident that they have enough information to assess the risks to any child involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the Director of Safeguarding/DSL with input from the Headmaster. The decision will be made based on consideration of the best interests of any child involved. Any decision will take into account the proportionality as well as the welfare and protection of any child. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

All incidents relating to nudes and semi-nudes being shared will be recorded, whether they have been referred externally or not.

This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should immediately notify the Director of Safeguarding/DSL, who should always inform the police as a matter of urgency.

14.8 FGM Mandatory Reporting Duty for Teachers

Teachers must report known cases of female genital mutilation (FGM) to the police. Non-teaching staff should refer FGM concerns to the Director of Safeguarding/DSL. Further information about FGM and the reporting duty can be found in Appendix 3.

14.9 Allegations Made and/or Concerns Raised about Staff and Others in School

The School has procedures for dealing with allegations made and/or concerns raised about staff or anyone working for, or on behalf of, the School whether paid or unpaid, which may affect the safety and welfare of children.

The procedures in this policy apply to staff who pose a risk of harm to children, or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harms

threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, false, unsubstantiated or unfounded allegations. These procedures are set out in Appendix 5 and follow the guidance in Parts 1 and 4 of KCSIE.

The School will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.

Detailed guidance is provided to staff to ensure all staff are clear on the rules of conduct and the expectations of the School in relation to contact with students, parents, colleagues and any other person who comes into contact with the School. This guidance is contained in the School's Staff Code of Conduct.

14.10 Allegations about Organisations or Individuals Using School Premises for Non-School Activities

Where School premises are hired or rented out to organisations or individuals, the School will seek assurance that they have appropriate safeguarding and child protection policies and procedures in place. The safeguarding requirements are included in any agreement for the use of the School premises (such as lease or hire agreement) as a condition of use and occupation of the premises and any failure by the provider to comply with this will lead to termination of the agreement.

Where the School receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities), the School will follow their safeguarding policies and procedures, including informing the LADO.

The School will also refer to DfE's non-statutory guidance [After-School Clubs, Community Activities and Tuition: Safeguarding Guidance for Practitioners \(September 2023\)](#).

14.11 Raising Concerns about Safeguarding Practices (Whistleblowing)

Whitgift School fosters a culture of openness and has put in place strategies and procedures to ensure that staff feel empowered to raise concerns relating to poor or unsafe practice and potential failures in the School's safeguarding provision. All reports will be taken seriously, investigated thoroughly and handled in a confidential and sensitive manner.

Where a member of staff feels unable to raise concerns within the School, or feels that their genuine concerns are not being addressed, they may alternatively report concerns in the following way:

- If there are concerns about the welfare of a student, Croydon's lead officers for child protection/safeguarding can be contacted.
- If there are concerns regarding the School's overall procedures around safeguarding, the following contact details can be used:
 - Croydon Council's confidential whistleblowing email address (schoolwhistleblowing@croydon.gov.uk)
 - NSPCC Whistleblowing Advice Line: Tel **0800 028 0285** (8am - 8pm Monday – Friday, 9am – 6pm at weekends) | help@nspcc.org.uk

Further information can be found in John Whitgift Foundation's Whistleblowing Policy.

14.12 Informing Parents

Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Director of Safeguarding/DSL will need to consult the Headmaster, the LADO, children's social care, the police and/or the student before discussing details with parents. In all cases, the Director of Safeguarding/DSL will be guided by the Croydon Safeguarding Children Partnership (CSCP) Threshold document.

14.13 Additional Reporting Duties

In addition to the reporting requirements explained above, the School will consider whether it is required to report a safeguarding incident to any other regulatory body or organisation including but not limited to the:

- Health and Safety Executive (HSE) (see HSE [RIDDOR Reporting](#))
- Charity Commission (see Charity Commission guidance '[How to report a serious incident in your charity](#)')
- Disclosure and Barring Service (see DBS guidance '[Making Barring Referrals to the DBS](#)')
- Teaching Regulation Agency (TRA) (see GOV.UK '[Report serious teacher misconduct](#)')
- Insurers

15. Training, Education and Awareness

The School ensures that guidance and training is arranged at induction and at regular intervals thereafter so that staff understand what is expected of them and have the necessary knowledge and skills to carry out their roles.

- The level and frequency of training depends on the role of the individual member of staff.
- All training will be carried out in accordance with Croydon Safeguarding Children Partnership (CSCP) procedures where possible/applicable.
- The School maintains a central record of all statutory and other training undertaken by staff members, governors and volunteers.

15.1 Induction

The Director of Safeguarding/DSL 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 training.

All staff will be provided with induction training that includes:

- this policy;
- the Behaviour, Discipline and Exclusions Policy;
- the Anti-Bullying Policy which includes measures to prevent bullying including cyberbullying, prejudice-based and discriminatory bullying;
- the Staff Code of Conduct;
- the Low-level Concerns Policy, which addresses allegations against staff and whistleblowing;
- the Whitgift Staff and Visitor Acceptable Use Policy and Social Media Policy which detail the acceptable use of technology, including mobile phones and appropriate student-staff communication in the context of professional relationships;
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or absence for prolonged periods;
- the role of the Director of Safeguarding/Designated Safeguarding Lead and Deputy DSLs as well as their identity and contact details;

- the School's approach to online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- appropriate safeguarding and child protection training in line with advice from Croydon Safeguarding Children Partnership (CSCP);
- a copy of Part 1 and Annex B of KCSIE (whether the member of staff works directly with children or not);
- Prevent duty training.

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

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

The nominated safeguarding governor receives additional training to enable them to fulfil their role.

15.2 Safeguarding Training

All staff:

- including those not directly working with children, receive a copy of this policy along with Part 1 and Annex B of Keeping Children Safe in Education 2025 and are required to confirm that they have received, read and understood these documents.
- receive annual safeguarding and child protection training (including online safety) in line with advice from Croydon Safeguarding Children Partnership (CSCP). Topics include but are not limited to:
 - expectations, applicable roles and responsibilities in relation to filtering and monitoring;
 - the local Early Help process and their role in it;
 - the MASH safeguarding referral process (incl. the services available and how to access support);
 - understanding the difference between Section 17 (Child in Need) and Section 47 (suffering or likely to suffer significant harm);
 - how to manage a disclosure (including that confidentiality cannot be promised);
 - Prevent
- receive regular and timely updates on child protection and safeguarding issues (including online safety) to ensure they remain up to date with new legislation and key developments. This is, for example, provided via the weekly Pastoral Update email to all staff and/or at staff meetings .
- and governors receive multi-agency safeguarding training at the level and frequency that is appropriate to their roles and responsibilities.
- The Director of Safeguarding/DSL and the deputies will undertake regular training to provide them with the knowledge and skills required to carry out their role. This training includes multi-agency training and Prevent awareness training relevant to their areas of responsibility. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role and in line with Annex C of KCSIE 2025.

15.3 Safer Recruitment Training

At least one person conducting any interview for any post at the School will have undertaken safer recruitment training which will be in line with local safeguarding procedures.

Please see Appendix 7 of this policy for more information about the School's safer recruitment procedures.

15.4 Teaching Children about Safeguarding

The School recognises that preventative education is most effective when delivered in the context of a whole-school approach. This approach prepares students for life in modern Britain, fosters an appreciation and understanding of the Equality Act 2010 and Fundamental British Values, and promotes a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence and harassment.

This ethos is underpinned by the School's values and standards, as well as, but not limited to, the School's Behaviour Policy and the broader pastoral support framework and related procedures.

The School provides opportunities for students to learn about safeguarding through Ideatum lessons, Whitgift's bespoke PSHE programme, which is timetabled weekly. The curriculum comprises 6 units:

Unit 1: Relationships with myself and other (Michaelmas Term, Half Term 1)

Unit 2: Digital and Online Worlds (Michaelmas Term, Half Term 2)

Unit 3: Health Lifestyles and Life Choices (Lent Term, Half Term 1)

Unit 4: Relationships Education (RE – Lower First Form) and Relationships and Sex Education (RSE – First Form to Lower Sixth Form)

Unit 5: Mental Health and Wellbeing (Trinity Term, Half Term 1)

Unit 6: My Place Within The World (Trinity Term, Half Term 2)

Upper Sixth Form students receive this education as part their Form time schedule, delivered by their Tutor on a fortnightly basis. Those Sixth Form students pursuing the International Baccalaureate Diploma (IB) engage with the curriculum through a series of half-termly drop-down workshops. Across all delivery routes, the Ideatum curriculum is underpinned by the principle of 'safeguarding through Ideatum', with core messages reinforced throughout the whole curriculum. The Assistant Head (Student Welfare) and Director of Safeguarding work closely with the Head of Ideatum to ensure the curriculum is tailored to the needs of the student body and aligned with statutory guidance.

Where appropriate, safeguarding themes are also addressed through the School's assembly programme, form time activities, and through a programme of visiting speakers and safeguarding briefings.

The School recognises that a 'one size fits all' approach may not be appropriate for all students and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some children with SEND might be needed. Therefore, all messaging is designed to be fully inclusive and developmentally appropriate.

The School fulfils its statutory obligations to provide Relationships Education (RE) and Relationships and Sex Education (RSE) through a variety of means, recognising the cross-curricular nature of these topics. Central to this provision is the Ideatum curriculum, which ensures developmentally appropriate and inclusive delivery across all year groups.

For further details of the RE/RSE unit, please refer to the School's Relationships Education (RE) and Relationships and Sex Education (RSE) Policy, alongside the Ideatum Policy. Through this unit, students explore a range of safeguarding and personal development topics, including:

Healthy and respectful relationships

Boundaries and consent

Stereotyping, prejudice and equality

Body confidence and self-esteem

Recognising abusive relationship, including coercive and controlling behaviour

The concepts and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, domestic abuse, 'honour'-based violence such as force marriage and Female Genital Mutilation (FGM), and how to access support, and

What constitutes sexual harassment and sexual violence and why these are always unacceptable.

The statutory DfE guidance can be found [here](#). Teachers can also refer to the GOV.UK resource hub '[Teaching about Relationships, Sex and Health](#)'.

In line with statutory guidance, the School currently teaches RE/RSE in accordance with the 2021 framework and is reviewing the updated 2025 guidance, which will be mandatory from September 2026. A curriculum review is underway to ensure continued compliance and relevance.

Students are introduced to emotional, physical, and mental health and wellbeing in an age-appropriate manner to develop resilience, self-esteem, self-confidence, and self-knowledge. These personal attributes are recognised as key protective factors in safeguarding, particularly in helping to mitigate against the risk of being drawn into extremism.

Students are given the opportunity and encouraged to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how the report will be handled. Students are encouraged to speak with any trusted adult if they have a worry or complaint. This may be their Form Tutor but may also be any member of staff with whom they feel comfortable or who is on duty.

The safe use of technology is a focus in all areas of the curriculum, including Ideatum, and key safety messages are reinforced as part of assemblies and tutorial/pastoral activities so that students can learn how to keep themselves safe online and when accessing remote learning or other such activities. Governors have ensured that appropriate filtering and monitoring systems are in place that meet the DfE Filtering and Monitoring Standards and is mindful that this should not lead to unnecessary restrictions on learning. Please also refer to the DfE guidance [Teaching Online Safety in Schools](#).

15.5 Parent Awareness

The School maintains regular communication with parents and carers to emphasise the importance of online safety and to inform about the systems in place to filter and monitor online activity. Parents and carers are also kept informed about the online tasks their child is being asked to complete, including the websites they will need to access for study purposes. Additionally, where applicable, they will be made aware of any School staff with whom their child will be interacting online.

Parental advice on safeguarding matters is also offered through newsletters and parent workshops/talks.

16. Online Safety and the Use of Mobile Devices

The School recognises that it is essential that students are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers the School to protect and educate the whole School community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incidents where appropriate.

As part of its duty to provide a safe learning environment, the School ensures their students know how to remain safe online. There is considerable and ever evolving risk to children online can be categorised into four areas of risk:

<p>CONTENT: Exposure to illegal, inappropriate or harmful content e.g. pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.</p>	<p>CONTACT: Being subjected to harmful online interaction with other users (e.g. peer to peer pressure, commercial advertising and adults posing as children or young adults) with the intention to groom or exploit them for sexual, criminal, financial or other purposes.</p>
<p>CONDUCT: Online behaviour that increases the likelihood of, or causes, harm e.g. making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.</p>	<p>COMMERCE: Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If the School feels that students or staff are at risk, a report should be made to the Anti-Phishing Working Group (https://apwg.org/).</p>

The School:

- recognises the importance of reporting and acting on online safety concerns in accordance with the Safeguarding and Child Protection Policy, Online Safety Policy, the Behaviour, Discipline and Exclusions Policy and the Anti-bullying Policy. The Governors do all that they reasonably can to limit children’s exposure to the above risks from the School’s IT system, maintaining an overview of filtering and monitoring.
- provides an age-appropriate, carefully sequenced programme that raises awareness of technical and behavioural aspects of online safety for students. This is predominantly delivered through Ideatum, a tailored programme, which contributes to the development of well-rounded critical thinkers.

Given the constantly evolving nature of technology and the associated risks, the School remains vigilant to these rapid changes by regularly reviewing its approach to online safety. The School’s Online Safety Policy is reviewed annually to ensure it addresses the current risks children face online.

The Director of Safeguarding/Designated Safeguarding Lead meets each term with the School’s Safeguarding Governor to discuss safeguarding and child protection matters, including online safety. Each term, a report on safeguarding matters, including online safety, is submitted to the Governors.

16.1 Filtering and Monitoring

Whitgift School has appropriate filtering and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School’s IT systems. The appropriateness of the filtering and monitoring systems is a matter for the School and has been informed, in part, by the risk assessment required by the Prevent Duty. Whitgift School employs a third party, South West Grid for Learning (SWGfL) to monitor violations to its online protocols.

The systems aim to limit exposure to the online safety risks (content/contact/commerce/conduct) by:

- reducing the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk)
- reducing the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk)
- restricting access to online risks such as online gambling, phishing or financial scams (commerce risk); and
- helping manage online behaviour that can increase a child’s likelihood of, or causes, harm for example making, sending and receiving explicit images (conduct).

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (e.g. 3G, 4G, 5G) which means that they may consensually and/or non-consensually share indecent images,

sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content undetected.

The School ensures compliance with the DfE Filtering and Monitoring Standards for Schools by:

- identifying and assigning roles and responsibilities to manage filtering and monitoring systems;
- reviewing the filtering and monitoring provision at least annually;
- blocking harmful and inappropriate content without unreasonably impacting teaching and learning; and
- having effective monitoring strategies in place that meet the School's safeguarding needs.

Further detail of the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems can be found in the School's Online Safety Policy.

16.2 The Use of Mobile Devices

The School's approach to the acceptable use of mobile devices in School is set out in the School's Online Safety Policy, Mobile Devices Acceptable Use Policy, Boarding House Acceptable Use Policy, Student Acceptable Use Policy, Staff and Visitor Acceptable Use Policy as well as in the Staff Code of Conduct.

17. Record Keeping

The Director of Safeguarding/DSL is responsible for ensuring that child protection records are accurate, up to date and that recording is of a high standard. All safeguarding monitoring and child protection records are highly confidential and will be securely stored in compliance with data protection legislation. Access to these confidential records is strictly on a 'need-to-know' basis only.

Concerns and referrals will be maintained in separate child protection files for each child, distinct from the student's education records.

- All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing, which will also help if/when responding to any complaints about the way a case has been handled by the School.
- All information should be recorded in CPOMS. Records should include:
 - a clear and comprehensive summary of the concern;
 - whether information of the concern was shared with the parent and what their response was;
 - where relevant, what action was taken to refer on concerns or manage risk within the School;
 - details of how the concern was followed up and resolved;
 - a note of any action taken, decisions reached and the outcome.
- An entry 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.

The Director of Safeguarding/DSL will open a child protection file following a report of a child protection concern about a student. The Director of Safeguarding/DSL will record all discussions with both staff and external agencies, decisions made and the reasons for them and the action taken.

The School will handle data in accordance with data protection legislation; the types of use are outlined in the School's privacy notices which are published on the School website. Details of child protection and safeguarding concerns will be retained in line with the School's information retention schedule. Any printed child protection and safeguarding records must be disposed of as confidential waste.

18. Risk Assessment

Where a concern about a student's welfare is identified, the risks to that student's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

The format of the risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual student welfare plans. Regardless of the form used, the School's approach to promoting student welfare will be systematic and student focused.

19. Behaviour Management, Physical Intervention and Reasonable Force

There are occasions where it may be appropriate for staff in 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 to prevent injury or violence. A 'no-contact' policy may leave staff at risk of being unable to fully safeguard students in extreme circumstances. The School will always follow the DfE guidance [Use of Reasonable Force](#) (July 2013) in such circumstances.

Physically handling children with SEND or medical needs requires further consideration as their additional needs make them more vulnerable.

20. Monitoring and Review

The Director of Safeguarding/DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with Governors as necessary and seeking contributions from staff as appropriate. The Senior Leadership Team will be updated regularly on the operation of the School's safeguarding arrangements.

Any serious safeguarding incidents at the School will be followed by a review of these procedures by the Director of Safeguarding/DSL and a report made to the Governors. Any deficiencies or weaknesses with regard to safeguarding arrangements will be remedied without delay.

This policy will be updated whenever needed (but at least annually) to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

Governors will also undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety and filtering and monitoring provision.

The Nominated Safeguarding Governor checks the Single Central Register on a termly basis.

Appendix 1: Responsibility of Governors and Proprietors

1. 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 two Foundation schools: Trinity School of John Whitgift and Whitgift School.

The Foundation has extensive statutory and regulatory duties beyond those relating to its two schools in the form of care homes and other significant commercial interests. Therefore, to support the Court of Governors of the John Whitgift Foundation (the 'Court') in fulfilling the Foundation's statutory and regulatory responsibilities, each of the two Foundation schools has its own School Governing Committee, of which at least four members are Court Governors, including the Chairman.

The Head of each school reports directly to the Chairman of the School Committee and it is the School Committee that has direct oversight of the School and its performance. Each of the 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 (and Annex B) so that they are fully aware of their role in safeguarding children and are able to fully implement policies.

2. The Role of the Governors

The Governors will ensure that the School meets its statutory duties with regard to safeguarding and protecting students. This includes:

- the Safeguarding and Child Protection Policy and procedures cover Early Help, and that these are consistent with Croydon Safeguarding Children Board procedures and Croydon's internal policies;
- the Staff Code of Conduct and policies cover staff-student relationships and communications, and staff use of social media (please also refer to the Whitgift Staff and Visitor Acceptable Use Policy and to the School's Social Media Policy);
- a procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present
- ensuring that the School works jointly with other agencies to ensure students can access help and support from Early Help services and statutory social work services and that children's plans are implemented and monitored (multi-agency working in line with Working Together to Safeguard Children);
- ensuring that a member of staff is appointed as the Designated Manager to address allegations against School staff
- that the Chair of the Governors is aware that they are responsible for liaising with the Local Authority Designated Officer (LADO) in the event of an allegation against the Headmaster.
- A senior member of staff has been appointed as the Designated Safeguarding Lead with responsibility for carrying out the statutory duties as set out in this policy. This individual must be given sufficient time and resources to carry out their responsibilities; and that another member of staff is appointed to deputise in their absence
- That there is a designated member of staff nominated to promote the educational achievement of Looked After Children, previously Looked After Children and Children with Care Experience and that this person has received appropriate training for the role.

- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the Staff Code of Conduct.
- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the School and there are robust whistleblowing procedures in place.
- Steps are taken to ensure parents and students are aware of the School's safeguarding and child protection policies and procedures.
- Governors ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including online. (Please refer to the School's Ideatum Policy.)
- The School has appropriate written procedures in place to ensure safer recruitment practices are followed and reasonable checks on visitors to the School are completed. There are also written procedures for dealing with allegations against staff or volunteers and for reporting matters to the Disclosure and Barring Service (DBS) as required. These policies are consistent with statutory guidance and reviewed on an annual basis. (Please refer to the School's Safer Recruitment Policy.)
- At least one Governor has undertaken accredited safer recruitment training.
- There is a nominated Safeguarding Governor who holds the School accountable of its statutory duties.
- All staff receive safeguarding and child protection training at least every two years and receive timely updates from the Director of Safeguarding/Designated Safeguarding Lead to ensure they remain up to date with new legislation. (Free safeguarding training is available for all Croydon schools via the [Learning & Development section of the CSCB website](#).)
- The School has procedures in place to deal with allegations made against other students.
- Children's wishes and feelings are taken into account, when deciding on what action to take or services to provide to protect individual children, and there is a robust system in place for gaining feedback from students.

3. Croydon's Children Families & Education Directorate

The Directorate includes services that will support the School to safeguard and promote the welfare of students by:

- co-ordinating the delivery of integrated children's services within the borough, including an Early Help service.
- providing statutory social work services under the Children Act 1989/2004.
- providing the School with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and online safety.
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer to (LADO).
- taking responsibility for those children who are not in education, including children who are known to be home educated.

Appendix 2: The Role of the Director of Safeguarding/Designated Safeguarding Lead (DSL)

The Governors of Whitgift School ensure that a member of the School's Leadership Team is appointed as the Designated Safeguarding (Lead). At the School, the Director of Safeguarding also serves as the Designated Safeguarding Lead (DSL). This individual has the necessary authority and status within the School and is provided with the time, training, resources and support required to perform their duties effectively. The Director of Safeguarding/DSL is assisted by a team of Deputy Designated Safeguarding Leads (DDSLs), who are trained to the same standard as the DSL. While some responsibilities of the DSL may be delegated to a Deputy, the School recognises that the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) lies with the Director of Safeguarding/DSL and cannot be delegated.

During school hours, the Director of Safeguarding/DSL (or a Deputy) **provides advice and support** on child welfare and is available for staff to discuss safeguarding and child protection concerns. Emergency contact details for out-of-school hours and holidays are provided at the beginning of the policy under 'Key Contacts (Whitgift School)'.

In accordance with [Annex C of KCSIE 2025](#), key responsibilities of the Director of Safeguarding/DSL (and deputies) include:

Managing Referrals

This includes but is not limited to:

- referring cases of suspected abuse and neglect to the local authority children's social care as required,
- supporting staff who make referrals to local authority children's social care,
- referring cases to the Channel programme where there is a radicalisation concern as required,
- supporting staff who make referrals to the Channel programme,
- referring cases to the Disclosure and Barring Service where a person is dismissed or left due to risk/haarm to a child,
- liaising with the police where a crime may have been committed. [NPCC – When to Call the Police](#)

Working with Others

This includes but is not limited to:

- keeping the Headmaster informed of ongoing safeguarding and child protection issues and enquiries, especially section 47 of the Children Act 1989 enquiries and police investigations.
- working with the Headmaster and relevant colleagues, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues, that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at School.
- taking part in strategy discussions and inter-agency meetings.
- providing a link between the School and other agencies, particularly children's social care and the Croydon Safeguarding Children Partnership
- liaising with the School's designated Mental Health Lead, where safeguarding concerns link to mental health.
- meeting regularly with the Safeguarding Governor to review safeguarding and child protection matters, including online safety, and present termly reports to the Governors on safeguarding and child protection, including online safety.
- reviewing and driving the rationale behind decisions in filtering and monitoring as per DfE Meeting Digital Technology Standards through regular liaison with IT staff.

- providing advice and guidance for staff on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- liaising with the Head of Learning Support/SENDCo when considering any safeguarding action for a child with SEND.
- ensuring parents are fully aware of the relevant School policies and procedures and that they are kept informed and appropriately involved.

Raising Awareness

This includes but is not limited to:

- ensuring that all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them. These include KCSIE Part 1 and Annex B, the School's Code of Conduct, the School's Safeguarding and Child Protection Policy (including the annexes to this policy) and the Behaviour, Discipline and Exclusions Policy.
- ensuring the School's Safeguarding and Child Protection Policy are up to date, consistent with Croydon's Safeguarding Children Board policies and reviewed annually (as a minimum)
- ensuring staff, including temporary staff, receive appropriate safeguarding and child protection training, at least every 2 years.
- ensuring the Safeguarding and Child Protection Policy is available on the School website and parents know that referrals about suspected abuse or neglect may be made and the role of the School in this.
- linking with the Croydon Safeguarding Children Partnership (CSCP) arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- ensuring that students understand how to raise concerns about the inappropriate behaviour of members of staff, including by speaking to trusted adults, such as parents, tutors, teachers, coaches and others; or using the 'Report Concern' button which is present on all School devices. Highlight the need for appropriate conduct in one-to-one lessons, such as music lessons.
- providing timely updates to all staff members and Governors on any changes in safeguarding or child protection legislation.

Other Responsibilities

- ensuring that significant violations to the Acceptable Use Policy are followed up, once they have been reported as needing urgent action by the School's third-party monitoring and filtering partner, South West Grid for Learning (SWGfL), working in liaison with the Head of IT.
- having an awareness of those children who may be in need, young carers, those who have Special Educational Needs and Disabilities (SEND) and those with relevant health conditions.
- with senior Deputy DSLs, participating in a rota to provide safeguarding cover during the school holidays. This includes responding to safeguarding and child protection concerns relayed by colleagues in the School Office, advising the DSLs of Whitgift International Summer School and the Whitgift Community Summer School, monitoring the swgfl@whitgift.co.uk email inbox for reports of violations, and addressing parental concerns. The on-call rota is administered by the PA to the Senior Deputy and shared with colleagues prior to each holiday.
- overseeing child protection systems within the School, including the management of records, standards of recording concerns and referral processes.
- record keeping in line with Annex C of KCSIE 2025 and paragraph 17 of this policy (including storing all records securely and ensuring they are kept up to date).
- ensuring that child protection records are transferred securely and within 5 days where a child transfers to another school and where appropriate, share relevant information with schools or colleges to enable continued support for the child on transfer. The School will obtain a confirmation of receipt when transferring files to a new school or college.

Training, Knowledge and Skills

The Director of Safeguarding/DSL and the deputies are required to undergo training at an appropriate level to provide them with the knowledge and skills to carry out their role. The deputies should be trained to the same standards as the Director of Safeguarding/DSL. The training must be updated at least every two years in line with local requirements and should include Prevent awareness training.

In addition to the formal training, their knowledge and skills should be updated regularly, at least once a year to allow them to understand and keep up with any developments relevant to their role. The Director of Safeguarding/DSL and the deputies (as appropriate) are also encouraged to attend the designated teachers' meetings hosted by Croydon and the Safeguarding Children Board to keep up to date with new policy, emerging issues and local Early Help, safeguarding and child protection procedures and working practices.

Appendix 3: Types and Signs of Abuse, Neglect, Exploitation and Specific Safeguarding Issues

It is vital that all staff are aware of the forms and signs of abuse, neglect and exploitation as well as specific safeguarding issues. By exercising professional curiosity and knowing what to look for, children in need of help or protection can be identified early. Staff should refer to KCSIE 2025 Part 1 and Annex B for further information.

Staff should be aware that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be covered by one definition and in most cases, multiple issues will overlap with one another. Staff should always be vigilant and always raise any concerns with the Director of Safeguarding/DSL (or deputy).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL/DDSL, should consider whether children are at risk of abuse or exploitation in situations outside the home ('extra-familial harm'). Extra-familial harm can occur in a range of extra-familial contexts, including in School, peer groups or within community/public spaces and/or online. Children may experience this type of harm from other children and/or from adults. Forms of extra-familial harm include exploitation by criminal or organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse and the influences of extremism which could lead to radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Children can also abuse their peers online. This can take the form of abusive, harassing and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the Director of Safeguarding/DSL or a Deputy DSL.

1. Abuse and Neglect

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

1.1 Types of Abuse and Neglect (Definitions)

Neglect: The persistent failure to provide care to meet the child's basic physical and/or psychological needs, such as providing adequate food, clothing or shelter, protecting the child from physical and emotional harm or danger, ensuring adequate supervision or ensuring access to appropriate medical care and treatment. It may also include neglect of, or unresponsiveness to a child's basic emotional needs.

Physical abuse: A form of abuse by causing physical harm or injury to a child which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in 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: The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may

feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another, psychological ill treatment through serious bullying (including cyberbullying and prejudice-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

1.2 Signs of Abuse and Neglect

Possible signs of abuse and neglect include, but are not limited to:

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 or late for school • abandoned or left alone for excessive periods; lack of parental supervision • compulsive stealing or scavenging
Physical abuse	<ul style="list-style-type: none"> • any injury such as bruising, bite marks, burns, scars 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 by an accident or injury or fail to seek adequate medical treatment • family use of different doctors and A&E departments
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 • concerning changes in behaviour or general presentation • phobias or panic attacks
Emotional abuse	<ul style="list-style-type: none"> • developmental delay • attachment difficulties with parents and others • withdrawal, lack of confidence and low self-esteem • aggressive behaviour towards others • overreaction to mistakes • fear of new situations
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

	<ul style="list-style-type: none"> • running away/going missing • absence from school
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

Mental health problems can also be a sign of abuse, neglect and exploitation.

The Croydon Safeguarding Children Partnership (CSCP) can provide advice on the signs of abuse and the DfE advice [What to do if you're worried a child is being abused \(March 2015\)](#) provides advice in identifying child abuse.

2. Specific Forms of Abuse and Safeguarding Issues

Keeping Children Safe in Education acknowledges the following as specific safeguarding issues:

- Child Abduction and Community Safety Incidents (see paragraph 2.1)
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) (see paragraph 2.2)
- County Lines (see paragraph 2.3)
- Children and the Court System (see paragraph 2.4)
- Children Absent from/Missing from Education (see paragraph 2.5)
- Children with Family Members in Prison (see paragraph 2.6)
- Cybercrime (see paragraph 2.7)
- Domestic Abuse and/or Sexual Violence (see paragraph 2.8)
- Homelessness (see paragraph 2.9)
- Induced Illness (see paragraph 2.10)
- Mental Health (see paragraph 2.11)
- Modern Slavery and the National Referral Mechanism (see paragraph 2.12)
- Serious Violence (see paragraph 2.13)
- Preventing Radicalisation (see paragraph 2.14)
- Honour-based Abuse (including Female Genital Mutilation and Forced Marriage) (see paragraph 2.15)

2.1 Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal of a child from their home without the consent of the parent or carer. This can be committed by a stranger, a family member or people known but not related to the victim (such as a friend or neighbour). It is a serious crime that causes significant emotional and psychological harm to the child and their family.

The School understands its responsibility to give students practical advice on how to keep themselves safe. Staff should build on children's confidence and abilities rather than simply warning them about all strangers.

Further information can be found at: <https://www.actionagainstabduction.org/>.

2.2 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse that occur when an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity:

- in exchange for something the victim needs or wants (e.g. money, gifts or affection), and/or

- for financial advantage or increased status of the perpetrator or facilitator.
- through violence or threat of violence to victims (and their families).

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim. CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. CCE and CSE can present differently in girls and boys, as well as having potentially different indicators. The victim may have been exploited even if the activity appears consensual.

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

Child Criminal Exploitation (CCE) can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of both CSE and CCE. Children:

- appear with unexplained gifts, money or new possessions;
- associate with other young people involved in exploitation;
- suffer from changes in emotional wellbeing;
- misuse drugs or alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

The CSE 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. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited (e.g. they believe they are in a genuine romantic relationship). Additional indicators of CSE include:

- having an older boyfriend or girlfriend;
- suffering from sexually transmitted infections or becoming pregnant;
- inappropriate sexualised behaviour;
- concerning use of internet or other social media;
- gang-association and/or isolation from peers/social networks.

Please also refer to DfE [Child Sexual Exploitation](#) (February 2017).

2.3 County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move, store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. The safeguarding risks for children involved in or vulnerable to county lines exploitation are significant and the impacts on their physical, emotional and psychological wellbeing can be severe.

Children are increasingly being targeted and recruited online using social media. They can easily become trapped by this type of exploitation as county line gangs can manufacture drug debts which need to be worked off and can

threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county line network.

A number of the indicators for CSE and CCE as detailed above may be applicable to children involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- go missing (from school or home) and are subsequently found in areas away from their home;
- are found in accommodation that they have no connection with ('trap house') or in a hotel room where there is drug activity.

The following reporting duties need to be considered:

- If a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/providers who offer support to victims of county lines exploitation.
- Where a student may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism should be considered.

Please also refer to Home Office [Criminal Exploitation of Children and Vulnerable Adults: County Line Guidance](#).

2.4 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. There are two age-appropriate guides to support children.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be especially stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

2.5 Children Absent from/Missing from Education

Children being absent from School, particularly repeatedly and/or for prolonged periods and children missing education can act as a vital warning sign for a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, 'honour-based' abuse or risk of forced marriage.

Multi-agency working is essential when a child is absent from school and potentially at greater risk of harm. This includes liaising with social workers where a child is on a Child In Need or Child Protection plan, or is Looked After by the Local Authority.

Where reasonably possible the School will hold more than one emergency contact for each student in order to ascertain whether a student is missing.

School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a student from the School gives a rise to a concern about their welfare.

The School shall inform the Local Authority of any student who is going to be added to or deleted from the School's admission register outside of standard transition times in accordance with the requirements of the School Attendance (Pupil Registration) (England) Regulations 2024. This will assist the Local Authority to:

- fulfil its duty to identify children of compulsory school age who are missing from education; and

- follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

The School shall provide the Local Authority with the name and address of any student of compulsory school age who:

- fails to attend School regularly; or
- has been absent for a continuous period of ten school days where their absence has been recorded with one or more of the codes statistically classified as unauthorised.
 - has been recorded with the absence code for illness and who the School has reasonable grounds to believe will miss 15 days consecutively or cumulatively because of sickness.

2.6 Children with Family Members in Prison

Children with family members in prison may face increased safeguarding risks, including emotional distress from separation and social stigma. They also may experience bullying and isolation, which can affect their wellbeing and development. These children are also more vulnerable to exploitation and behavioural issues.

It is important for staff to support and monitor these children to ensure their safety and wellbeing. The National Information Centre on Children of Offenders [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

2.7 Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- 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'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources.
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent of committing 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 Director of Safeguarding/Designated Safeguarding Lead (or her deputy), should consider referring to the [Cyber Choices](#) programme, a nationwide police programme supported by the Home Office and led by the National Crime Agency which 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.

2.8 Domestic Abuse and/or Sexual Violence (DASV)

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Exposure to domestic abuse can have a significant impact on children's emotional development and mental health. The Domestic Abuse Act 2021 provides a 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 captures a range of different abusive behaviours, including psychological, sexual, 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. This includes domestic abuse within their own intimate relationships (teenage relationship), child to parent violence and abuse by family members.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

Staff can contact **Operation Encompass** on 0204 513 9990 (8am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

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

2.8.1 Operation Encompass

Croydon is part of the Operation Encompass service which operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult in School (at Whitgift, this would be the Director of Safeguarding/Designated Safeguarding Lead) before the child or children arrive at School the following day. This ensures that the school has up-to-date, relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

2.9 Homelessness

Being homeless or being at risk of becoming homeless presents a real 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 asked to leave a property

If staff are made aware or suspect that a student may be at risk of homelessness they should talk to the Director of Safeguarding/DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, the School understands that this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm.

2.10 Induced or Fabricated 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.

2.11 Mental Health

The School is committed to promoting the emotional health and wellbeing of students. In some cases, poor mental health can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

Where children have experienced abuse, exploitation, neglect or adverse childhood experiences including traumatic events, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at School.

If staff have a mental health concern about a student that indicates they may be suffering, or are at risk of suffering serious harm, they must contact the Director of Safeguarding/DSL or a DDSL immediately.

- DfE [Mental Health and Behaviour in Schools guidance](#)
- Public Health England [Promoting Children and Young People's Emotional Health and Wellbeing](#)

See [Rise Above](#) for links to materials and lesson plans. Guidance and policies relating to a range of topics can also be found on the [CSCB website](#).

2.12 Modern Slavery and the National Referral Mechanism

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 National Referral Mechanism (NRM) is available in the [Modern Slavery Statutory Guidance](#).

2.13 Serious Violence

The School is a source of safety and security for many students. 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 them 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 from School;
- change in friendship groups;
- relationships with older individuals or groups;
- decline in educational interest and/or performance;
- signs of self-harm or significant change in wellbeing;
- signs of assault or unexplained injuries;
- unexplained gifts or new possessions.

All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from School or permanently excluded from School, experienced child maltreatment or having been involved in offending, such as theft or robbery).

Staff need to be alert to the possibility of students bringing weapons onto the site. There are various reasons why a young person may be carrying a weapon and 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 School or any weapon that is found on the school site.

Further advice can be found in the Home Office's guidance [Preventing Youth Violence and Gang Involvement](#).

2.14 Prevention of Radicalisation

Under the Counter-Terrorism and Security Act 2015, the School has a legal duty to have due regard to the need to prevent young people from being radicalised and drawn into terrorism. This duty (the [Prevent duty](#)) is seen as part of the School's wider safeguarding obligations.

Whitgift School aims to build student's resilience to radicalisation by promoting fundamental British values, developing their critical thinking skills and enabling them to challenge extremist views. The School is committed to providing a safe space in which students and staff can discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

To comply with the Prevent duty, the School has adopted the following definitions:

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. There are possible indicators that should be taken under consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

Staff should be alert to changes in student's behaviour, which could indicate that they may be in need of help or protection. They should use their judgement in identifying children who might be at risk of radicalisation and consult the Director of Safeguarding/Designated Safeguarding Lead for internal advice.

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

Under the Counter-Terrorism and Security Act 2015, the School also has a duty to refer young people to Croydon's Channel Panel under the Prevent strategy where there are concerns that they are being radicalised. The Director of Safeguarding/DSL should exercise their professional judgement about whether a referral is proportionate and appropriate. Prior to making a referral, the School may also seek advice from the police schools' officer, the MASH Professionals' Consultation Line and/or Croydon's Prevent Co-ordinator, whose contact details are set out in the 'Key Contacts' section at the front of the policy.

The DfE guidance [Managing Risk of Radicalisation in your Education Setting](#) outlines indicators of risk and aids the School to prepare the most appropriate and proportionate response.

2.14.1 Risk Indicators of Radicalisation

A student at risk may be showing behaviours that could increase their risk and vulnerability to radicalisation. Examples include but are not limited to:

- being drawn to conspiracy theories;
- beginning to isolate themselves from family and friends;
- viewing or engaging with inappropriate online content and having uncontrolled access to the internet.

Other risk indicators of vulnerable students:

- Indicators of an **identity crisis** include distancing themselves from their cultural/religious heritage and feeling uncomfortable with their place in society.

- Indicators of a **personal crisis** include family tensions, a sense of isolation, disassociation from existing friendship groups, low self-esteem and searching for answers to questions about identity, faith and belonging.
- Indicators of **vulnerability through personal circumstances** include migration, local community tensions, events affecting their country of origin, alienation from UK values and a sense of grievance triggered by personal experience of racism or discrimination.
- Indicators of **vulnerability through unmet aspirations** include perceptions of injustice, feelings of failure, rejection of civic life, vulnerability through criminality, experiences of dealing with the police and involvement with criminal groups.

Critical indicators include where the student is:

- articulating support for extremist causes or leaders.
- accessing extremist websites
- in contact with extremist recruiters.
- possessing extremist literature.
- using extremist narratives and a global ideology to explain personal disadvantage.
- justifying the use of violence to solve societal issues,
- making significant changes to their appearance and/or behaviour.
- joining extremist organisations.

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

Channel 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.

Additional Notes

- The School also has a Prevent Risk Assessment, which reflects the local situation in Croydon

2.15 Honour-Based Abuse

So-called 'honour-based' abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female genital Mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves additional risk factors such as a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. Staff should speak to the Director of Safeguarding/DSL if they have any doubts.

Where staff are concerned that a child might be at risk of HBA (regardless of the motivation), they must contact the Director of Safeguarding/Designated Safeguarding Lead as a matter of urgency. If appropriate, the Director of Safeguarding/DSL will activate local safeguarding procedures, using existing national and local protocols of multi-agency liaison with police and Children's Social Care.

2.15.1 Female Genital Mutilation (FGM)

FGM is a form of honour-based violence. FGM refers to procedures that intentionally alter, remove or cause injury to the female genital organs for non-medical reasons. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

While Whitgift is a boys' school, awareness is key as FGM may affect family members, friends or female visitors to the School, such as those participating in the Primary School Project or the Summer Schools.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable;
- spending longer than normal in the bathroom or toilet due to difficulties urinating;
- spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- frequent urinary, menstrual or stomach problems;
- prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.

FGM – Reporting Duty for Teachers

Staff must be aware of the statutory duty for teachers to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the Director of Safeguarding/DSL and involve Children's Social Care as appropriate. 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.

If the member of staff is unsure whether this reporting duty applies, they must refer the matter to the Director of Safeguarding/DSL in accordance with this policy. Those failing to report FGM will face disciplinary sanctions.

The statutory guidance [Multi-agency statutory guidance on FGM](#) must be followed. A summary of the FGM mandatory reporting duty can be found in the [FGM Fact Sheet](#).

2.15.2 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.

2.15.3 Forced Marriage

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

Guidance on the warning signs that forced marriage may about to take place, or may have already taken place, can be found in the Multi-Agency Guidelines: Handling Cases of Forced Marriage (April 2023)(pages 39-44).

If the School becomes aware of a child that may be at risk of a forced marriage, it should, in the first instance, refer to the MASH. If a child is at immediate risk, the School should contact the police.

Staff should speak to the Director of Safeguarding/DSL if they have any concerns. The Forced Marriage Unit can be contacted on 0207 008 0151 or by emailing fmufco.gov.uk for advice or information.

Detailed information can be found here: GOV.UK [Forced Marriage - Guidance](#)

Appendix 4: Dealing with Allegations of Child-on-Child Abuse

The School recognises that children of any age are capable of abusing other children (often referred to as child-on-child abuse) and that this can happen inside and/or outside of school. 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, pre-judice based and discriminatory bullying);
- physical abuse, such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- abuse in intimate personal relationships (teenage relationship abuse);
- sexual violence;
- sexual harassment, which may be stand-alone or part of a broader pattern of abuse; examples include:
 - sexual comments (e.g. making sexual remarks about clothes and appearance or calling someone sexualised names)
 - sexual “jokes” or taunting;
 - physical behaviour (e.g. deliberately brushing against someone, interfering with someone's clothes)
 - displaying pictures or photos of a sexual nature
 - upskirting
 - online sexual harassment, which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence and may include:
 - consensual or non-consensual sharing of sexual images and videos (sharing of nudes/semi-nudes);
 - sexualised online bullying
 - unwanted sexual comments and messages, including on social media
 - sexual exploitation, coercion and threats.
- 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 a criminal offence and may constitute sexual harassment under the Voyeurism (Offences) Act 2019.
- consensual and non-consensual sharing of nude and semi-nude images and/or video (previously known as sexting and youth produced sexual imagery);
- initiation/hazing type violence and rituals.

1. Harmful Sexual Behaviour (Sexual Violence and Sexual Harassment)

Harmful sexual behaviour is an overarching term that includes sexual violence and sexual harassment; it is behaviour that can happen online and/or face-to-face and which can also occur simultaneously between the two. The School recognises that problematic, abusive and violent sexual behaviours are developmentally inappropriate and may cause developmental damage. Harmful sexual behaviour, like every child-on-child abuse, is never acceptable and will be taken seriously. When considering harmful sexual behaviour, both the ages and the stages of development of the children are critical factors. It can occur between two children or a group of children of any age and sex.

Whilst any report of sexual harassment and violence should be taken seriously, 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 understands the importance of addressing inappropriate behaviour to prevent problematic, abusive and/or violent behaviour in the future and will respond to allegations seriously. Appropriate support will be offered in all cases.

Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assaults and causing someone to engage in sexual activity without their consent. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape. Where a report includes an act of sexual violence, the police will be notified, often as a natural progression of making

a referral to the MASH. 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 Director of Safeguarding/Designated Safeguarding Lead (or her 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. The School should also complete its child-on-child sexual abuse risk assessment.

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of School. Reference to sexual harassment in this policy is 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.

The School understands that if sexual harassment is not challenged, it can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

2. Child-on-Child Sexual Behaviour and Abuse: Care for Boarding Students

Ofsted's Review of Sexual Abuse in Schools and Colleges (June 2021) made it clear that the prevalence of sexual harassment in schools is far higher than most staff believe and that students may be unwilling to report it, for a range of reasons.

Whitgift School recognises that boarding students may be more vulnerable to sexual harassment and sexual abuse, and staff are mindful of this when they perform their daily duties in School and in Founder's House. No form of sexual activity between students is permitted – including contact and non-contact activities, such as the viewing or sharing of sexual imagery – irrespective of the age of the students. Students within Founder's House typically range in age from 13 to 18. Recognising the need to avoid a sense of imbalance, those who are close in age may share a room. Healthy student relationships are encouraged and supported, and boarders benefit from additional talks beyond the whole-school Ideatum provision.

The relationships of boarding students are also carefully monitored by staff so that any concerns around sexualised behaviour in the boarding house can be quickly addressed. Such matters should be referred promptly to the Director of Safeguarding / Designated Safeguarding Lead.

3. The School's Approach to Child-on-Child Abuse

The School:

- will promote an environment where victims feel empowered to raise concerns and report incidents in the confidence that they are taken seriously.
- will advise all staff to maintain an attitude of 'it could happen here'. It is recognised, that even if there are no reports of child-on-child abuse at the School, it does not mean it is not happening; it may be the case that it is just not being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the Director of Safeguarding/Designated Safeguarding Lead. Concerns raised will be treated seriously and followed up in a timely and sensitive manner in accordance with the procedures in this policy.
- adopts a zero-tolerance approach to child-on-child abuse including harassment, abuse and violence. Downplaying certain behaviours (by, for example, dismissing sexual harassment as 'banter', 'having a laugh' or 'part of growing up' can lead to a culture of unacceptable behaviours, an unsafe environment for children and at its worst, to a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognises that sexual violence and sexual harassment between students is a serious safeguarding issue and such behaviour will not be tolerated. All staff should challenge inappropriate behaviour between students and anyone who suffers, witnesses or hears of abuse of any form between students is asked to report it in accordance with

this policy and/or the School's Behaviour, Discipline and Exclusions Policy and Anti-Bullying Policy, so that appropriate action can be taken.

- takes all necessary steps to maintain a planned PHSE curriculum (at Whitgift, this is known as Ideatum) to convey the School's policy for preventing harmful sexual behaviour and to promote respectful behaviour between students with regards to sexual conduct. The School will also make close links to the Relationships Education Curriculum. Please refer to the School's Ideatum Policy and Relationships and Sex Education Policy.
- 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.

4. Management of Allegations of Child-on-Child Sexual Violence and Sexual Harassment

The School will follow the guidance within Part Five of KCSIE 2025 as part of the School's 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.

4.1 Responding to the Initial Report

Children who are victims of sexual violence and sexual harassment may find the experience traumatic and distressing and the School recognises that it is not easy for children to tell staff about their abuse. Children may display signs or behave in ways that they hope adults will recognise and respond to. Staff are trained to recognise signs of abuse and are expected to be vigilant for any indicators (such as changes in the child's behaviour). They are required to take appropriate action and understand how to respond to reports of abuse, regardless of how the reports are made, whether directly by the victim or by a third party.

The School recognises that the initial response is crucial, as it can influence not only the handling of the report but also the willingness of future victims of sexual violence and sexual harassment to come forward. Where possible, staff should be accompanied by the Director of Safeguarding/DSL or another member of staff when managing a report. They should:

- listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making judgement about its veracity.
- where possible, ask open questions about whether student(s) have been harmed, the nature of the harm or if they may be at risk.
- where the allegation involves material posted online, request that the electronic device is handed over, as part of the investigation and use legal powers to search and confiscate property as set out in the statutory DfE guidance Searching, screening and confiscation , [UKCIS Sharing Nudes and Semi-Nudes: Advice for Education Settings and the School's Searching a Student Policy](#). The key consideration is for staff not to view or forward illegal images of a child. The UKCIS advice provides more details on what to do when viewing an image is unavoidable.
- make a written record of the report (recording the facts as the child has presented them).
- inform the Director of Safeguarding/DSL (or deputy), as soon as practically possible, if they are not involved in the initial report and only share the report with those necessary in order to progress it.

4.2 Considerations Following a Report

Reports of sexual harassment and sexual violence are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. Such decisions are made on a case by case basis taking all the circumstances into account, in the best interest of the students involved. The School will ensure there is a robust response to all incidents which are led by the Director of Safeguarding/DSL who will always have regard to the procedures set out in Part Five of KCSIE 2025.

Immediate consideration will be given as to how best support and protect the victim and the alleged perpetrator(s) and any other children involved/impacted. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect the victim and other children and in line with the DfE guidance Information Sharing: Advice for Safeguarding Practitioners.
- the nature of the alleged incident(s) including if it was a one-off or a sustained pattern of abuse, whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed.
- the ages and developmental stages of the children involved and any power imbalance between the children.
- if there is an intimate personal relationships between the children.
- an understanding intra familial harms and any necessary support for siblings following incidents.
- whether there is an ongoing risks to those involved.
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

When there has been a report of sexual violence, the Director of Safeguarding/DSL should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will 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), the other children (and, if appropriate, adults) at the School, especially any actions that are appropriate to protect them and the time and location of the incident. Where appropriate, they will be discussed with those involved and their parents. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.

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

The School will consult with **Part Five of KCSIE 2025** when managing allegations of child-on-child sexual harassment or sexual violence and consider (depending on the circumstances) the following options to manage reports:

- manage the incident internally (e.g. through utilising the School's Behaviour, Discipline and Exclusion Policy and by providing pastoral support),
- Early Help for the children involved,
- referral to children's social care where a child has been harmed, is at risk of harm or is in immediate danger,
- report to the police.

The Director of Safeguarding/DSL may take advice from the MASH Professionals' Consultation Line before making a decision.

Where a referral will be made to children's social care or the police, the Director of Safeguarding/DSL will discuss the issue with the relevant agency and following this discussion, a decision will be made as to whether and how to inform the alleged perpetrator and their parents.

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 and other spaces. 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.

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 everything in its power to prevent such activity.

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.

4.3 Investigations and Findings

The School will record the findings of investigations undertaken by the police and/or the children's social care, and if the police decide not to take any further action, will consider whether investigation should be undertaken or commissioned by the School to enable it to determine, whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances when this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances, the School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.

The School should continue to support those involved, with reference to the range of support options set out in Part Five of KCSIE and should also consider whether further referral and/or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and/or harmful sexual behaviours identified, or the victim where the concerns were found to be deliberately invented or malicious.

Appendix 5: Allegations Made and Concerns Raised About a Member of Staff

The School is committed to fostering an open and transparent environment where any concerns about adults are reported promptly, responsibly and to the appropriate person. The School recognises the importance to ensure that all adults working with or interacting with children adhere to the School's values and expected standards of behaviour. Additionally, the School acknowledges that concerns may arise from various sources and in different ways. This section outlines a framework for raising, recording and addressing concerns about staff (including supply staff, volunteers and contractors) efficiently and effectively.

1. Conduct and Safe Working Practice

The School expects staff and volunteers to set a good example to students through their own conduct and behaviour by adhering to the School's Staff Code of Conduct which provides clear guidance about the standards of appropriate behaviour, professionalism and appropriate boundaries. In addition, staff are expected to follow the School's Social Media Policy in terms of their own use of social media, particularly in relation to professional standards and relationships with students and/or their families.

2. Concerns and Allegations

The School's procedures for managing concerns or allegations against staff, supply staff, volunteers and/or contractors working in the School follows Part 4 of DfE Keeping Children Safe in Education, DfE Working Together to Safeguard Children and are consistent with Croydon Safeguarding Children Partnership arrangements for [managing allegations against adults who work with children](#). This section is aimed at ensuring that every allegation is investigated thoroughly and handled in a fair and consistent manner that prioritises the safety and wellbeing of children while also providing appropriate support for the person who is subject to the allegation.

In this section reference to 'allegations' also covers concerns. 'Staff' also refers to supply staff, volunteers and contracted staff.

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').

Concerns and allegations that may meet the harm threshold will be addressed as set out in Section 1 of Part 4/KCSIE. 'Low-level' concerns and allegations that do not meet the harms test as below (paragraph 3), will be addressed as set out in Section 2 of Part 4/KCSIE.

3. Definition of Harm

It is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist the understanding of what may amount to 'harm' the following should be considered:

- The Safeguarding Vulnerable Groups Act 2006 does not give a definition of harm but encourages people to apply a "normal, everyday meaning".
- The Children Act 1989 defines
 - 'harm' as 'ill-treatment or impairment of health or development (including, for example, impairment suffered from seeing or hearing the ill-treatment of another);
 - 'ill-treatment' as including sexual abuse and forms of ill-treatment which are not physical;
 - 'health' as physical health or mental health.

4. Allegations that **MAY MEET** the Harms Threshold

An allegation that may meet the harm threshold is any information which indicates that anyone working in the School, including supply teachers, volunteers and contractors, may have:

- behaved in a way that has, or may have harmed a child;
- possibly committed a criminal offence against/related to a child;
- behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of the School.

The welfare of a child is paramount and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, the School recognises the sensitivity of the situation and will also offer appropriate welfare support to the adult subject to the investigation.

The Governing Board has appointed the Headmaster as the School's 'Case Manager' for the purposes of the allegation procedures and who will link with the Local Authority Designated Officer (LADO) for all allegations raised and will lead any investigation. The Director of Safeguarding/DSL has been identified as their deputy to act in their absence.

Any allegation against an adult working with children that suggests any of the behaviour above, must be reported immediately:

- Allegations in relation to staff members should be referred to the Headmaster.
- Allegations against the Headmaster should be referred to the Chairman of the Governing Board.
- Allegations against an adult that is no longer working/volunteering should be referred to the police.
- Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a student will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children's social care and the police.

4.1 Dealing with the Allegation

When dealing with an allegation, the School will:

- apply common sense and judgement.
- deal with allegations quickly, fairly and consistently.
- look after the welfare of the child ensuring that there is no at risk of immediate harm and refer cases of suspected abuse to the Local Authority children's social care. It is important to bear in mind that although the concern may relate to an individual student, other students may also be at risk.
- provide appropriate support the person subject to the allegation, ensuring they are treated with dignity and fairness throughout the investigation.
- only share information with those who need to know, maintaining confidentiality for both the child and the adult involved, unless there is a legal requirement to disclose further information.

In cases pertaining staff, the Headmaster may consult with the Local Authority Designated Officer (LADO) as soon as the School becomes aware of an allegation. This responsibility may be delegated to the Director of Safeguarding/DSL as appropriate. Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts and to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

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

- further enquiries to enable a decision about how to proceed
- immediate referral to the Police
- consideration of disciplinary proceedings (e.g. suspension)
- consideration of a senior strategy meeting.

A decision as to how to proceed and whether or not to suspend a member of staff will be taken by the Headmaster following consultation with the LADO (and, in most serious cases, the police). Suspension from contact with children is not an automatic response and the decision will be taken according to the circumstances of each particular case, giving due weight to the views of the LADO, and guidance in KCSIE and Working Together to Safeguard Children. The decision as to whether or not to suspend the Headmaster is taken by the Governing Board (having consulted the relevant authorities). In borderline cases, discussions with the LADO can be held informally and without naming the School or individual. If there is reason to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or local authority's children's social care will be convened in accordance with the statutory guidance Working Together to Safeguard Children.

All procedures set out in Part 4 of KCSIE 2025 will be adhered to when managing allegations of any kind. 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.

4.2 Allegations about Supply Staff/Contracted Staff

Where an allegation relates to a member of supply staff provided by an agency, the School will agency will find out the facts and liaise with the LADO to determine a suitable outcome. Agencies will be fully involved with any enquiries from the LADO, police and/or local authority children's care.

4.3 Allegation Outcomes

The definitions that should be used when the outcome of an allegation is determined are set out below:

- *Substantiated*: there is sufficient evidence to prove the allegation
- *Malicious*: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- *False*: there is sufficient evidence to disprove the allegation
- *Unsubstantiated*: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence, or
- *Unfounded*: to reflect cases where there is no evidence or proper basis which supports the allegation being made

4.4 Record Keeping

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records unless the individual gives their consent for retention of the information. However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, decisions reached, and the outcome i.e. substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

4.5 Referral to the DBS/TRA

The School will refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child. The referral will be made as soon as possible, and ordinarily on conclusion of an investigation, when the individual is removed from regulated activity. The School will also consider a referral to the DBS if a member of staff is suspended or deployed to another area of work that is not regulated activity.

If a member of staff resigns or ceases to provide their services at a time when child protection concern exist in relation to that person, those concerns will still be followed up by the School in accordance with this policy and a referral to the DBS will be made promptly if the criteria for the referral are met. Further information can be found in DfE guidance [Making Barring Referrals to the DBS](#).

Separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) needs to be made because of unacceptable professional conduct that may bring the profession into disrepute, or a conviction for a relevant offence. Details about how to make a [referral to the Teaching Regulation Agency](#) can be found on GOV.UK.

5. Dealing with Concerns or Allegations that **DO NOT MEET** the Harms Threshold (Low-level Concerns)

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work.
- does not meet the allegations threshold or is otherwise not considered by the LADO to be serious enough to consider a referral.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work.
- relates to their conduct outside of work which has caused a sense of unease about the adult's suitability to work with children, and
- does not meet the allegations threshold.

Examples of such behaviour includes, but is not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on a personal mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating a child.

It is crucial that any such concerns are shared with the right person immediately so that it can be recorded and dealt with appropriately, sensitively and proportionately in a timely manner.

The Headmaster is the ultimate decision-maker in respect of all low-level concerns but will usually review the concern with the Director of Safeguarding/DSL. In line with the School's Low-Level Concerns Policy, all concerns regarding the conduct of staff working with children be recorded for future reference to identify any potential patterns of inappropriate behaviour. Consultation with the LADO will be considered as to whether the threshold for LADO involvement is met.

5.1 Sharing/Reporting a Concern

Safeguarding and promoting the welfare of children is the responsibility of everyone working in and for the School and the sharing of low-level concerns should be seen as a neutral act. The School encourages all staff to share confidentially any low-level concerns (including self-reporting) so that they can be addressed appropriately.

The procedure for sharing confidentially any such concerns is set out in detail in the School's Low-Level Concerns Policy. By having a formalised method of reporting low-level concerns, it allows for the identification of patterns of behaviour that might be concerning and also allows staff to reflect and self-report on their behaviour which strengthens the culture of safeguarding within the School.

- Where a low-level concern is raised about the Headmaster, it should be referred to the Chairman of Governors who will liaise with the LADO to determine whether the matter is a low-level concern and what course of action to take.
- Where a low-level concern relates to a supply teacher or contractor, the School will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.
- Staff are encouraged to self-refer if, for instance, they find themselves in a situation that could be misinterpreted, or upon reflection, believe they may have compromised the standard set out in the School's Staff Code of Conduct.

5.2 Investigating the Concern

If a concern is raised by a third party (e.g. a colleague), as much evidence as possible will be collected by speaking to the person who raised the concern (if known), to the individual about whom the low-level concern has been raised (unless advised by the LADO not to do so) and any witnesses.

Most low-level concerns by their very nature are likely to be minor, will not give rise to any ongoing concern and accordingly, will not require any further action. Other concerns may be most appropriately dealt with by means of management guidance and/or training.

5.3 Record Keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken, the rationale for decisions and action taken as well as the name of the individual sharing their concern.

Please refer to the School's Low-Level Concern Policy for further details.

6. Music Tuition and 1:1 Working: The Potential Risk of Allegations

It is recognised that professionals such as music teachers, sports coaches, and other staff working directly with children may, by the nature of their roles, work on a one-to-one basis. This can increase their vulnerability to allegations being made against them, particularly where physical contact may form part of the activity. Music teachers, Sports coaches and other staff working 1:1 need to be aware of their conduct and behaviour, including physical contact, being misinterpreted by a child or taken out of context by other adults and:

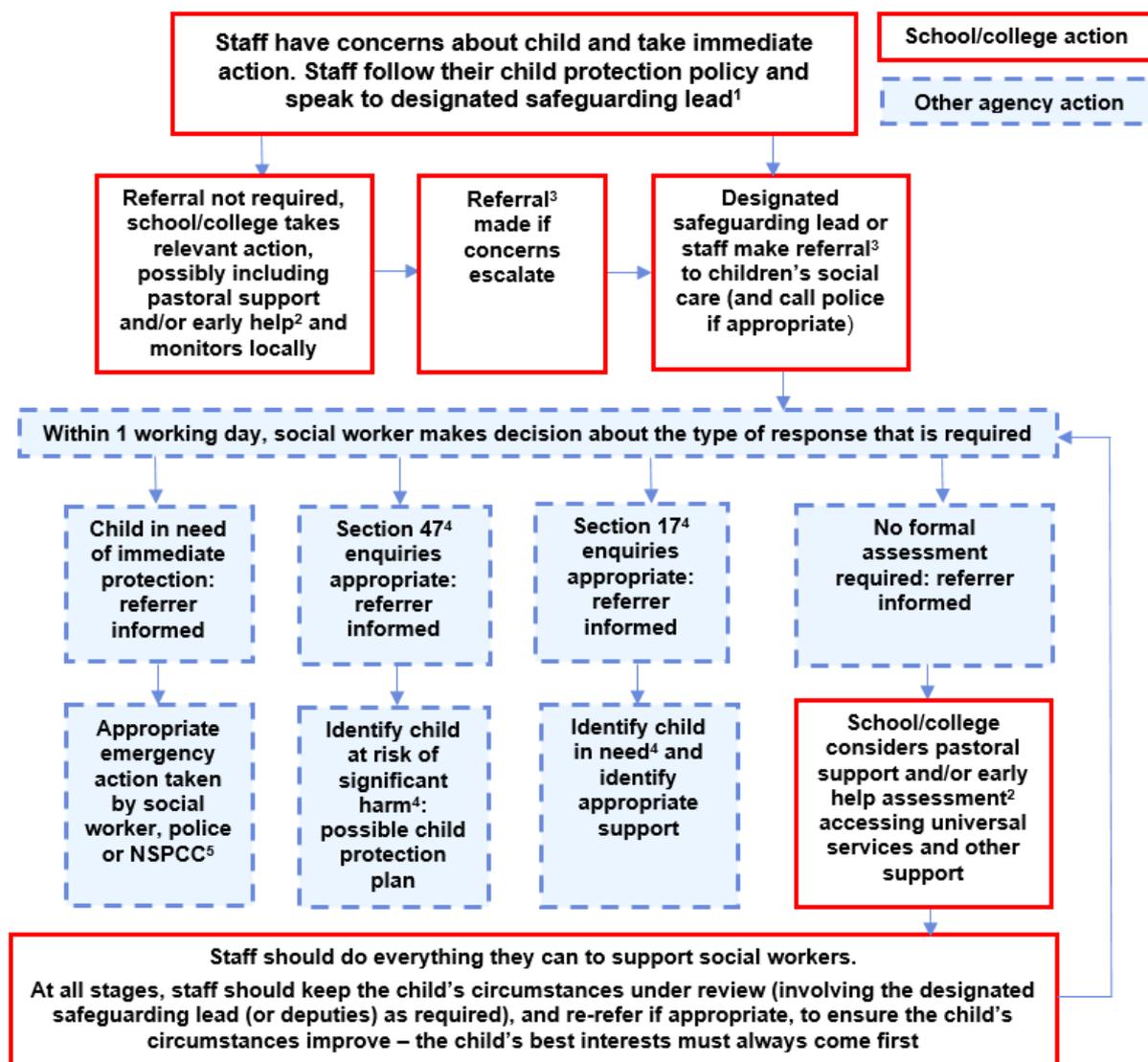
- ensure they behave in an appropriate manner and maintain professional boundaries at all times.
- only use physical contact as necessary within the context of the activity, for example as a means of demonstrating technique, and only for as long as needed.
- make sure any physical contact cannot be misinterpreted 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 (usually their Head of Department) and make sure a record is taken.
- never travel alone with children in a car.

- seek permission from parents before contacting children by mobile phone, for instance to rearrange a lesson or rehearsal, and use home telephone contacts wherever practicable.

To address potential risks, the School should:

- provide 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
- pass 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 policies
- make sure music teachers are aware of the School's safeguarding and staff conduct policies prior to starting.

Appendix 6: Actions where there are Concerns About a Child (Flowchart)



Source: DfE Keeping Children Safe in Education (KCSIE) 2025, page 24

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

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

3 Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

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

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

Appendix 7: Safer Recruitment

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in the School. The recruitment process is rigorous and in compliance with all relevant safeguarding requirements.

All staff including part-time staff, temporary and supply staff, as well as visiting staff, such as peripatetic staff and sport coaches are subject to the necessary statutory child protection checks before starting work. For most appointments, an enhanced DBS check with so-called barred list information will be appropriate. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service. The School will also verify employment history and request references from previous employers to assess the candidate's suitability for working with children.

During the recruitment process, candidates will be assessed not only on their qualifications and experience but also on their understanding of safeguarding principles and their ability to contribute to a safe and supportive environment for children.

As part of the shortlisting process, the School will also consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the School may want to explore with an applicant at interview.

The School maintains a Single Central Record (SCR) that documents all recruitment checks, including DBS clearance and identity verification. As an independent school, Whitgift must also record details of the section 128 checks undertaken for those in management positions.

Full details of the School's safer recruitment procedures for checking the suitability of staff, governors, volunteers and others working with children in the School is set out in the School's Safer Recruitment Policy.



- iSAMS
- CPOMS
- Other

Signed by: _____

Role: Headmaster/ Senior Deputy / Assistant Head (Student Welfare)/ Director of Safeguarding/ Deputy Director of Safeguarding/
Deputy Head (Academic)/ Assistant Head (Pastoral & Boarding)/ Proctor/ Director of Section

Appendix 9: Health & Safety and Risk Assessments

Responsibility for Health and Safety

The Governors and the Headmaster ensure that there are robust policies in place to address health and safety to meet the statutory responsibility for the safety of students and staff within the school environment. The School's Health and Safety Policy has been adapted to meet the needs of the School and it is based on government guidance. It seeks to balance risk avoidance against providing students with opportunities to take part in activities that help them to learn to manage risk themselves.

Day-to-day responsibility for Health and Safety issues in the School is delegated to the Director of Estates and Facilities, a member of staff who is competent to carry out these duties and who has received the appropriate training. Governors maintain oversight of Health and Safety through reports to the Estates Subcommittee.

Risk Assessments

The School uses and reviews a large number of risk assessments, for its extensive activities, including co-curricular activities and educational visits. The School has also developed specific documents which include:

- Child-on-child Sexual Abuse Risk Assessment
- First Aid Risk Assessment
- Prevent Risk Assessment

The School also has in place robust policies for:

- site security
- the checking of contractors
- the use of the School site by other organisations
- School policies are reviewed on either an annual or a biennial basis, and the 'policy tracker' is maintained by the PA to the Senior Deputy

Appendix 10: Internal Investigation Process

These summarised guidelines are intended to illustrate the key stages of an internal investigation process following a breach of the Staff Code of Conduct, a grievance being raised about another member of staff or as the result of a 'whistle-blower'. These matters should be treated with full consultation of the relevant Whitgift Foundation HR policies and procedures and procedures, which are available online in the Whitgift Foundation Staff Zone: <https://staffzone.benefit-select.co.uk/my-benefits#/login> > Information Centre > HR Policies and Procedures.

1. Pre-Investigation

When a potential disciplinary matter or grievance arises, it is crucial to deal with the matter as promptly as is reasonably practicable. It is, however, paramount that no action is taken before an investigation has been carried out to establish the facts of the case from multiple perspectives. Usually, the Senior Deputy (delegated by the Headmaster) will nominate a member of SLT, who is not involved in the case, to review the details of the issue raised and arrange fact-finding meetings with the involved parties. It is important that investigation meetings are neutral in nature and are regarded as a non-judgemental exercise in fact-finding.

Questions should be planned in advance of the meetings to ensure that the pertinent issues are discussed, that rigorous 'professional curiosity' is exercised, and the individuals involved have the opportunity to respond and add any further details. The interviewer should be given sufficient time to prepare for the interview. It is best practice to include a trusted note-taker in the meeting to allow the questioner to focus on the discussion and, despite this not being a disciplinary hearing, interviewees are entitled to bring a colleague as support.

2. During the Investigation Meeting

It is important to offer the available support to affected colleagues during what is often a very stressful process for them. At the end of the meeting, it is good practice to ask the note taker to print the notes and ask the colleague interviewed to read and sign the notes to check that they are a fair representation of what was discussed. As the result of what is established during investigatory meetings, it may be necessary to arrange further meetings with new colleagues who are named as 'witnesses'.

3. Post Investigation

At the end of the investigatory stage the nominated SLT colleague should collate the notes and summarise the evidence to pass onto the Senior Deputy who will decide the next stages in consultation with the Whitgift Foundation HR Department and the Headmaster. If it is decided to take the case to disciplinary or grievance hearing, a different member of SLT should carry out the hearing from the investigator.

4. Evidence from an Investigation

The Senior Deputy should ensure that all notes and record keeping from the investigation are kept on file and that the evidence/reports gathered are accurate. This includes any disclosures to third parties that are necessary.

5. Decision Making before or after an Investigation

All decision making by the Headmaster and Senior Deputy before and after an investigation should be noted in writing. These notes should include dates and times of when decisions have been reached and an acknowledgement of other options that were dismissed at the time and why.

6. Disciplinary Hearing

All disciplinary hearings must follow the procedure laid out in the John Whitgift Foundation "Staff Disciplinary and Grievance" Policy.