

# WHITGIFT SCHOOL

## SAFEGUARDING AND CHILD PROTECTION POLICY

Colleagues responsible for this policy:

**Ally Tiltman (Director of Safeguarding/Designated Safeguarding Lead)**

Email: [a.tiltman@whitgift.co.uk](mailto:a.tiltman@whitgift.co.uk)

**Dayle Kirby (Deputy Head, Pastoral)**

Email: [dmk@whitgift.co.uk](mailto:dmk@whitgift.co.uk)

Policy reviewed: August 2024

Next review: August 2025

# CONTENTS

## Key contacts

## **CORE OPERATIONAL AND POLICIES**

### **PART 1 Safeguarding for all staff**

#### Induction and Training

Safeguarding Children

Early Help cases

Child protection

Referral for statutory social work services

Children who need a social worker

#### **Child protection procedures**

Role of Whitgift School

Recognition

Records

Dealing with Disclosures

Referral

Attendance at Case Conferences, core groups and CIN meetings

Monitoring

Confidentiality and Information Sharing

Working with parents and carers

Multi-agency working

#### **Other Safeguarding Concerns**

Child-on-child abuse

Child on child sexual behaviour, sexual violence and harassment including consent

#### **Contextual (Extra-Familial) Safeguarding for Young People**

- Children who run away/go missing
- Child Criminal Exploitation (CCE)
- Children at risk of Sexual Exploitation (CSE)
- Serious Violent Crime – people at risk from gang activity or serious youth violence
- Domestic Abuse or Sexual Violence
- Operation Encompass
- Prevention of radicalisation and extremism
- Mandatory reporting of FGM (*including so-called Honour based abuse, breast ironing and forced marriage*)
- Modern Slavery
- Children requiring mental health support
- Online safety
- Remote Learning
- Filtering and Monitoring
- Reviewing Online Safety
- Cybercrime
- Looked after children and care leavers
- Children who are lesbian, gay, bi, or trans (LGBT)
- Children with SEND
- Private Fostering: Local Authority notification
- Young Carers
- Fabricated and induced Illness
- Homelessness

- Children with Family Members in Prison
- Children and the Court system
- Children who are absent from school or missing from education
- Elective Home Education (EHE)

Opportunities to teach Safeguarding  
The Child's Wishes  
Other relevant safeguarding guidance

## **PART 2 Responsibility of Governors, Proprietors and Management**

Governors  
Headmaster  
Croydon's Children Families & Education Directorate

## **PART 3 Safer recruitment**

## **PART 4 Safeguarding concerns and Allegations against staff**

Conduct and Safe Teaching Practice  
Allegations that meet harms threshold  
Low-level concerns  
Whistleblowing  
Behaviour Management and use of reasonable force  
Music Tuition

## **PART 5 Health and safety and risk assessments**

**Annex 1: The role of the Designated Safeguarding Lead**

**Annex 2: Child protection: definitions and indicators**

**Annex 3: Actions where there are concerns about a child**

**Annex 4: Decision making checklist**

**Annex 5: Internal investigation process**

## Key contacts

### Headmaster

Name: Andrew Halls

Email: [adh@whitgift.co.uk](mailto:adh@whitgift.co.uk)

### Director of Safeguarding/Designated Safeguarding Lead

Name: Ally Tiltman

Email: [a.tiltman@whitgift.co.uk](mailto:a.tiltman@whitgift.co.uk)

Tel. 020 8688 9222 ext. 2778

Mob. 07525 848709

### Deputy Designated Safeguarding Leads:

Name: Rachel Attenborough, Senior Deputy

Email: [rra@whitgift.co.uk](mailto:rra@whitgift.co.uk)

Name: Dayle Kirby, Deputy Head (Pastoral)

Email: [dmk@whitgift.co.uk](mailto:dmk@whitgift.co.uk)

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

Email: [adn@whitgift.co.uk](mailto:adn@whitgift.co.uk)

Name: Faye Carter (Director of Sixth Form)

Email: [fec@whitgift.co.uk](mailto:fec@whitgift.co.uk)

Name: Ross Munro (Director of Middle Years)

Email: [rim@whitgift.co.uk](mailto:rim@whitgift.co.uk)

Name: Sami Michael (Director of Junior Years)

Email: [sfm@whitgift.co.uk](mailto:sfm@whitgift.co.uk)

Name: Tom Stead (Deputy DSL with responsibility for Prevent)

Email: [tss@whitgift.co.uk](mailto:tss@whitgift.co.uk)

### Designated Member of Staff for Looked After Children and Children with Care Experience:

Name: Ally Tiltman

Email: [a.tiltman@whitgift.co.uk](mailto:a.tiltman@whitgift.co.uk)

### Safeguarding Governor to the School:

Name: Ravi Kothakota

Email: [Safeguarding.Governor@whitgift.co.uk](mailto:Safeguarding.Governor@whitgift.co.uk)

### Safeguarding Governor to the Foundation:

Name: Mike Gascoigne

Email: [michaelgascoigne@johnwhitgiftfoundation.org](mailto:michaelgascoigne@johnwhitgiftfoundation.org)

### Chairman of the Court of Governors of The John Whitgift Foundation:

Christopher Houlding

Contact (via The Clerk) 020 8680 8499

## London Borough of Croydon

### **Local Authority Designated Officer (LADO):**

lado@croydon.gov.uk

[schoolwhistleblowing@croydon.gov.uk](mailto:schoolwhistleblowing@croydon.gov.uk)

Senior LADO: Steve Hall

Email: [steve.hall@croydon.gov.uk](mailto:steve.hall@croydon.gov.uk)

Tel. 0208 760 6400 ext. 24334

Mob. 07825 830328

LADO: Jane Parr

Email: [jane.parr@croydon.gov.uk](mailto:jane.parr@croydon.gov.uk)

Tel. 0208 726 6000 ext. 84343

Mob. 07716092630

Education Safeguarding Lead

Deputy Chair for Croydon Channel Panel

Cath Bennett

Email: [Catherine.Bennett@croydon.gov.uk](mailto:Catherine.Bennett@croydon.gov.uk)

Mob. 07729 623489

### **MASH (Multi-Agency Safeguarding Hub):**

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

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

MASH Service Manager: Nina Chaudhry

Email: [nina.chaudhry@croydon.gov.uk](mailto:nina.chaudhry@croydon.gov.uk)

### **Croydon Safeguarding Children Partnership (CSCP)**

Website: <https://croydonlcsb.org.uk/>

[Safeguarding learning & development](#)

Email: [CSCP@croydon.gov.uk](mailto:CSCP@croydon.gov.uk)

Tel: 0208 604 7275

## Core operational policies and procedures

### Purpose and Aims of this policy

This policy contains statutory guidance from the Department for Education ('the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). Schools and colleges in England **must** have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance, children includes everyone under the age of 18 (KCSIE 2024). 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.

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

### The use of "must" and "should" in this policy

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.

### Aims

- Ensure safe recruitment practice in checking the suitability of all staff and volunteers to work with children, including the completion of risk assessments.
- Ensure staff are appropriately trained.
- Raise awareness of safeguarding/child protection issues amongst all staff and volunteers and of what to do if they have concerns.
- Ensure that volunteers are appropriately supervised.
- Ensure that procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are robust.
- Ensure that links with relevant agencies are effective, including working in partnership regarding child protection matters, such as attendance at case conferences and core group meetings.
- Ensure the school environment is safe and is one in which students feel secure and are encouraged to talk freely about anything that concerns them.
- Ensure students know there are adults in School whom they can approach if they are worried about anything.
- 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 we respond appropriately to any concern or allegation about a member of staff or volunteer.
- Ensure staff follow accepted "safe practice" principles when working with students.
- Ensure students are protected from all forms of harm.
- Ensure that the specific needs of boarders are met and that the School adheres to the National Minimum Standards for Boarding Schools.

This policy should be read alongside other relevant policies including:

- Keeping Children Safe In Education 2024 (including Annex B)
- Whitgift Staff and Visitor Acceptable Use Policy
- Social Media and Communication Policy
- Staff Code of Conduct
- Low-level Concerns Policy

## PART 1 Safeguarding Information for ALL Staff

### Induction and training

- The Headmaster will ensure that all staff are fully inducted, made aware of the following policies of the School and that staff are fully aware of their role in implementing these:
  - Staff receive annual or biennial safeguarding and child protection training (including online safety training) which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
  - Behaviour, Discipline and Exclusions Policy, which includes measures to prevent bullying including cyberbullying, prejudice-based and discriminatory bullying
  - Staff Code of Conduct and Low-level Concerns Policy, which address allegations against staff and whistleblowing. The Whitgift Staff and Visitor Acceptable Use Policy and Social Media Policy detail the acceptable use of technology, including mobile phones and appropriate student-staff communication in the context of professional relationships
  - Safeguarding response to children who are absent from education, especially where there is repeated absence or absence for long periods
  - Role of the Director of Safeguarding/Designated Safeguarding Lead and her Deputy DSLs
- Staff, including those not directly working with children, will be asked to confirm that they have received, read, and understood **Keeping Children Safe in Education 2024 and Annex B**.
- The Director of Safeguarding/Designated Safeguarding Lead will ensure that all staff are fully inducted with regard to the School's child protection procedures and that they receive safeguarding and child protection training on a two-yearly basis, as a minimum. This will include online safety training.
- The Headmaster will ensure that a central record is kept of all statutory and other training undertaken by staff members, governors and volunteers.
- School staff and governors will receive multi-agency safeguarding training at the level that is appropriate to their roles and responsibilities.
- As well as basic safeguarding training, the Director of Safeguarding/Designated Safeguarding Lead and her deputies will receive specific training on their role and attend other relevant multi-agency training and courses, as relevant to their areas of responsibility.
- School staff will also receive training on Early Help and the MASH safeguarding referral process, as part of their safeguarding training. They will understand what the services are for and how to access support through them. This will also include understanding the difference between Section 17 (child in need) and Section 47 (suffering or likely to suffer significant harm).
- School staff will receive regular and timely updates on child protection and safeguarding issues via the Director of Safeguarding/Designated Safeguarding Lead to ensure they remain up to date with new legislation and key developments e.g. via the weekly Pastoral Update email to all staff
- **All** staff should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- **All** staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. Children should never be made to feel they are a problem or feel ashamed.
- **All staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. (This may apply to children with Special Educational Needs and Disabilities, and to others.)



## Safeguarding Children

### **Safeguarding: is about every child**

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

providing help and support to meet the needs of children as soon as problems emerge	protecting children from maltreatment, whether that is within or outside the home, including online	preventing impairment of children’s mental and physical health or development
ensuring that children grow up in circumstances consistent with the provision of safe and effective care	promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children	taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework

### **Early Help cases**

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

Children with disabilities and additional needs, including those with special educational needs (whether they have an EHCP or not)	Young carers	Children with mental health needs
Children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime	Children who frequently go missing from home, school or care	Children who are misusing drugs or alcohol
Children at risk of exploitation through modern day slavery and trafficking	Children at risk of being radicalised or exploited	Children with a family member in prison or affected by parental offending
Children growing up in environments where misusing drugs or alcohol is witnessed	Children who have returned home from care	Children who show early signs of abuse or neglect, including where there are concerns about the cumulative effect of low-level neglect
Children at risk of so-called “honour-based abuse”, Female Genital Mutilation (FGM) or forced marriage	Children who are persistently absent from education	Privately fostered children

- Where the child’s extra needs require services, 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. Staff will consult with parents *prior* to making any referral to discuss the matter and **gain consent** to refer the child.

- Where the child is receiving an Early Help service, the School will work as part of the Team Around the Child/Family (TAC/F) and take up the role of lead professional, where this is appropriate.
- Early Help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the School believes that this is not the case, consideration should be given making a referral for a statutory social work service.

**Child Protection: is about those at risk of significant harm.**

The School will carry out its duty to safeguard students which is:

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

**For a list of definitions and indicators of abuse and neglect, see appendix 1.**

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

Child abuse or neglect	Disguised compliance	Children missing from Education (CME)	Children who are home schooled (“Hidden Children”)	Radicalisation / extremism	So-called “Honour Based Abuse” (HBA)
Breast Ironing	Mental health concerns including self-harm and suicide	Bullying including online (cyber) bullying and prejudice-based bullying	Racism, disability, homophobic or transphobic abuse	Gender-based violence/violence against women and girls (VAWG)	Domestic Abuse
Poor parenting	Child sexual exploitation and trafficking (CSE)	The impact of new technologies on sexual behaviour	Substance misuse	Female Genital Mutilation (FGM)	Forced marriage
Fabricated or induced illness	Faith abuse	Serious Youth Violence (including Child Criminal Exploitation: County Lines) (CCE)	Private fostering	Sexting (Youth Produced Sexual Imagery)	Child-on-child abuse
Teenage relationship abuse	Serious Violent Crime	Sexual violence	Sexual harassment	Children with family members in prison	Children and the court system
Homelessness	Adverse Childhood Experiences (ACEs)	Trauma and Attachment issues	Up-skirting and down-skirting	Knife Crime	Modern Day Slavery
Cybercrime					

The School will seek advice from the MASH Professionals’ Consultation Line to help make decisions on the child’s level of need and the appropriate services for a referral. Staff will consult with the Director of Safeguarding/Designated Safeguarding Lead for advice and to discuss the case prior to making any referral for

services. All referrals for a children's social care service or Early Help will be made by way of the MASH Portal. [MASH](#)

## [Referral](#)

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

The Online tool [Report a child to your local council](#) directs you to the local children's social care contact number.

### **Referral for a statutory social work service**

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

Additional information is available here: [Contextual Safeguarding](#).

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

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

- Carrying out a child and family assessment to identify the child's needs and establish if the child is a **child in need** under section 17 of the Children Act 1989. These are children (including children with disabilities) who are unlikely to meet a reasonable standard of health and development unless provided with services.
- Convening a **strategy meeting/discussion under child protection procedures** 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 on-going (including details of appropriate services).
- Families may also be referred to Early help or signposted to universal services.

### **Children who need a Social Worker**

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

and educational outcomes. Further documents which may assist in supporting these families can be found in [Review of children in need](#). The document [Help, Protection, Education](#) concludes the review.

## **Child protection procedures**

### **Role of Whitgift School**

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

Working together to safeguard children (DfE 2023) [Working together to safeguard children](#)

What to do if you're worried a child is being abused (DfE 2015) [What to do if you're worried a child is being abused - Publications - GOV.UK](#)

The London Safeguarding Children Board child protection procedures [London Safeguarding Children Board: Child Protection Procedures](#)

Keeping children safe in education (DfE 2024) [Keeping Children Safe in Education](#)

Croydon Safeguarding Board local policies and procedures [CSCB local policies and procedures](#)

When to call the Police: Guidance for schools (2020) [When to call the Police](#)

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

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

- identify those students where there are child protection concerns and make a referral to MASH
- attend child protection case conferences to share effectively information about risk and harm
- contribute to the development and monitoring of child protection plans, as a member of the core group
- carry out the School's role in implementing the child protection plan, continually monitoring the child's wellbeing, and liaising with the allocated social worker, as required

### **Recognition**

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a student are reported to the Director of Safeguarding/Designated Safeguarding Lead.
- **Staff should refer to Annex 2 of this policy for abuse indicators** or to page 11 onwards of KCSIE 2024, that may suggest a student may be at risk of suffering significant harm.
- Any concerns held by staff should be discussed in the first instance with the Director of Safeguarding/Designated Safeguarding Lead or her deputy and advice sought on what action should be taken. Where required, advice can be obtained from the MASH Professionals' Consultation Line on a no-names basis.
- Concerns may be monitored over time and should be recorded in CPOMS.
- As mentioned above, all staff should know what to do if a child tells them they are being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality.
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face.

## Records

- All safeguarding monitoring records and child protection records relating to students are highly confidential and will be kept on CPOMS so they are separate to the student's education records. These records will be securely held and access for relevant staff will be on a need-to-know basis.
- The Director of Safeguarding/Designated Safeguarding Lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- All information should be recorded in CPOMS.
- Records should show:
  - what the concerns were and how they were first raised;
  - 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;
  - whether any follow-up action was taken;
  - how and why decisions were made; and
  - outcomes.
- 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.
- When a child transitions to a new educational establishment, their CPOMS records are transferred securely to the Designated Safeguarding Lead at the new school or college, and confirmation of receipt is obtained. The Director of Safeguarding/Designated Safeguarding Lead should also consider if there is a need to share any key information about the family ahead of their start date. This may assist the new school or college in planning appropriate support for the family.
- Details of child protection and safeguarding concerns or incidents should be retained by the School and kept in line with the School's information retention schedule. Any written or printed child protection and safeguarding records must be disposed of as confidential waste.

## Dealing with disclosures

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

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

## DO NOT DELAY

- Tell the Director of Safeguarding/Designated Safeguarding Lead or her Deputy as soon as you can – it may be necessary to interrupt a lesson to do this – do not leave notes in the DSL's pigeonhole or simply send an email as they may not receive this until the end of the day, once the student has gone home.
- Early referral gives more time to offer help to the student and family before the situation becomes more serious.
- When the matter is already severe or serious, early referral gives more time for others to protect the student.

- The Director of Safeguarding/Designated Safeguarding Lead may consult the MASH.

### **MAKE WRITTEN NOTES**

- At the earliest opportunity make a written record of your concerns. (These can then be added to CPOMS by a DSL at a later point.) Record facts accurately and do not express opinion. These notes will help to ensure accuracy in recalling events later. If handwritten, notes should be legible, signed and dated with time included.
- Do not take photographs of any physical injuries; if you have seen injuries, record these on a body map. Do not use audio to record disclosures.
- Any original notes must be given to the Director of Safeguarding/Designated Safeguarding Lead as soon as possible and kept, even though they may be added to CPOMS by a DSL at a later point.

### **Referral**

- Where possible, a decision on whether to refer a student to MASH should be made by the Director of Safeguarding/Designated Safeguarding Lead or her 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/Designated Safeguarding Lead should be informed as soon as possible.
- Referrals should be completed using MASH portal either by the member of staff raising concerns or by the Director of Safeguarding/Designated Safeguarding Lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the portal within 48 hours.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the Director of Safeguarding/Designated Safeguarding Lead may discuss the case on a no-names basis with the MASH Professionals' Consultation Line to obtain advice on how to proceed. 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.
- If the child already has an allocated social worker, the referral should be made directly to them. If the child is not already known to children's social care, referrals should be made to the MASH. If the child lives outside Croydon, a referral should be made to their home local authority.
- All referrals will be acknowledged by the MASH and the referrer informed of what action will be taken.
- If the School does not think the child's situation is improving within a reasonable timescale following referral, this should be taken up with children's social care via the designated safeguarding lead.

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

- The designated safeguarding lead will liaise with children's social care to ensure that all relevant information held by the School is provided to children's social care during the course of any child protection investigation.
- The designated safeguarding lead will ensure that the School is represented at child protection case conferences and core group meetings:
  - where possible, a member of staff who knows the child best, such as a class teacher or head of year will be nominated to attend
  - failing that, the designated safeguarding lead or their deputy will attend.
  - if no-one from the School can attend, the designated safeguarding lead will ensure that a report is made available to the conference or meeting.

## Monitoring

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

- monitoring will be carried out by the relevant staff member in conjunction with the Director of Safeguarding/Designated Safeguarding Lead;
- 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/Designated Safeguarding Lead will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.

## Confidentiality and Information Sharing

### KCSIE 2024 tells us:

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

### Further information on information sharing can be found here:

- [Information Sharing: Advice for Practitioners](#)
- [Information Commissioner's Office](#)
- [Data Protection Toolkit for Schools](#)

- All information obtained by School staff about a student will be kept confidential and will only be shared with other professionals and agencies with the family's consent.
- If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing, if they have sufficient understanding of the issues. Young people aged 16 and 17 are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act. Otherwise, consent should be sought from parents. Young people aged 18+ are presumed to have the capacity to give their own consent to information sharing.
- Where a child is at risk of suffering significant harm, the School recognises its legal duties to share this information with children's social care and to make appropriate referrals. Equally, where a child is subject to a child protection investigation, the School must share any information about the child requested by children's social care.
- Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made, and parents made aware of this. Before taking this step, the School should consider the proportionality of disclosure against non-disclosure: is the duty of confidentiality overridden by the need to safeguard the child?
- Parental consent to referral can be dispensed with, if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, the School should discuss this with the MASH Professionals' Consultation Line on a no-names basis to gain advice on whether this course of action should be taken.
- Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the stated purpose.

- If a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the School's duty to share information.
- Staff should discuss any concerns or difficulties around confidentiality or information sharing with the Director of Safeguarding/Designated Safeguarding Lead or seek advice from the MASH Professionals' Consultation Line.

### **Working with Parents and Carers**

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

- Make parents aware of the School's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students on where necessary, by having a link to the safeguarding statement on the home page of our website [here](#). All 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.

The School is aware of the additional guidance available from the DfE on dealing with issues around parental responsibility: [Understanding and dealing with issues relating to parental responsibility](#)

### **Multi-agency Working**

- The School will work in partnership with relevant agencies 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 school-age children and will co-operate with the Croydon Safeguarding Children Board to ensure joint working with partner agencies in order to improve outcomes for children educated in Croydon.

### **Inspection**

As an independent school, Whitgift is inspected by the Independent Schools Inspectorate (ISI) and their inspection framework can be found [here](#).

### **Other Safeguarding Concerns**

**The Law – KCSIE 2024 Pages 25-29 sets out legal requirements around safeguarding. These include**  
[The Human Rights Act 1998](#)  
[Equality Act 2010](#)  
[Public Sector Equality Duty](#)  
[Data Protection Act and UK GDPR](#)



## Child-on-Child abuse

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

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

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

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

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

Whitgift School responds to **all** reports and concerns of child-on-child sexual violence and sexual harassment, **including those that have happened outside of the school premises, and/or online**. What to look out for, and indicators of abuse are set out in Part One of KCSIE 2024. Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to Sixth Form age. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. All staff working with children are advised to maintain an attitude of "*it could happen here*" and know we have ZERO-tolerance to child-on-child harassment, abuse and violence.

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

### Sexual Violence

When referring to sexual violence, we are referring to sexual offences under the Sexual Offences Act 2003. Rape, assault by penetration, sexual assaults and causing someone to engage in sexual activity without their consent are crimes. (Definitions of categories can be found on page 112 KCSIE 2024). Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to the MASH. Whilst the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the principle of referring to the police remains. Where an alleged incident took place away from the School or online but involved students from the school, the School's duty to safeguard students remains the same.

The 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.

### Consent

KCSIE 2024 tells us that "*Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity*

*occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice."*

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

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Further information on consent can be found [HERE](#).

**Sexual Harassment**

KCSIE 2024 tells us that “when referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of School. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.”

Examples include:

- sexual comments
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes
- displaying pictures, photos or drawings of a sexual nature
- upskirting and
- online sexual harassment.

Further examples can be found on page 114 KCSIE 2024.

**Harmful Sexual Behaviour**

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

Full details can be found in KCSIE 2024 on pages 114-115.

**Policy**

- The School recognises that sexual violence and sexual harassment between students is a serious safeguarding issue and such behaviour will not be tolerated. The School’s Behaviour, Discipline and Exclusions Policy and Anti-bullying Policy will reflect the School’s approach, and staff and students are made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.
- The School will follow the guidance within Part Five of KCSIE 2024 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.
- The School takes all necessary steps to maintain a planned PHSEE 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 which has been compulsory for all schools since September 2020. Please refer to the School's Ideatum Policy and Relationships and Sex Education Policy.

- The School will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the School and appropriate referrals made to the police and children's social care.
- The School will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all students and staff.
- It should be noted that **ALL** reports of sexual harassment and violence should be taken seriously, but staff need to be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with additional needs are three times more likely to be abused.
- The School will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

### Procedures

- Not all children will directly tell a member of staff about their experience and staff need to know how to respond when overhearing a conversation or if they notice a change in the child's behaviour. Children who are victims of sexual violence and sexual harassment may find the experience stressful and distressing.
- The School will ensure there is a robust response to all incidents and will follow the procedures set out in Part Five of KCSIE 2024.
- The Governors of the John Whitgift Foundation should ensure that the School contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).
- Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the Director of Safeguarding/Designated Safeguarding Lead, who will also carry out a risk assessment to look at any continued risk to the victim or other students and staff from the alleged perpetrator within the School environment. (Please refer to the Child-on-child Sexual Abuse Risk Assessment.) Toolkits that will support the risk assessment process include Brook Traffic Light Tool.
- Where the allegation involves material posted online, the School will request that the electronic device is handed over, as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance Searching, screening and confiscation guidance and [UKCIS Sexting in schools and colleges advice](#). (Please refer to the School's Searching a Student Policy.)
- **The key consideration is for staff not to view or forward illegal images of a child.** The highlighted advice provides more details on what to do when viewing an image is unavoidable and informing the Director of Safeguarding/Designated Safeguarding Lead (or her deputy), as soon as practically possible, if they are not involved in the initial report.
- When there has been a report of sexual violence, the Director of Safeguarding/Designated Safeguarding Lead (or her deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider: the victim, especially their protection and support, the alleged perpetrator(s) and all the other children (and, if appropriate, adults) at the School, especially any actions that are appropriate to protect them.
- The member of staff and Director of Safeguarding/Designated Safeguarding Lead will write up a record of the investigation that will set out how the School will respond to the incident.
- The Director of Safeguarding/Designated Safeguarding Lead may take advice from the MASH Professionals' Consultation Line before making a decision. Possible outcomes include referral to Early Help Services, the

MASH, Learning Access and/or the police, or managing the matter internally under School behaviour policies.

- Where a referral will be made to children’s social care or the police, the Director of Safeguarding/Designated Safeguarding Lead 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.
- KCSIE 2024 states “[The School] should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The [Director of Safeguarding/Designated Safeguarding Lead] (or her deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school or college. Important considerations will include:
  - the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. 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 schools or college’s duty and responsibilities to protect other children
  - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
  - the ages of the children involved
  - the developmental stages of the children involved
  - any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
  - if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
  - that sexual violence and sexual harassment can take place within intimate personal relationships between children
  - importance of understanding intra familial harms and any necessary support for siblings following incidents
  - are there ongoing risks to the victim, other children, adult students or school or college staff, and
  - other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation”
- The 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.
- Where necessary and appropriate, the School will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf.
- Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that children will “take sides” following a report and the School will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment. The School will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media, and do everything in its power to prevent such activity.

- [The National Organisation for the Treatment of Abusers \(NOTA\)](#) provides support for professionals involved in work with, or related to, sexual offending.
- The School will consult with **Part Five of KCSIE 2024** when managing allegations of child-on-child sexual harassment or sexual violence. The School will also consider the 4 likely scenarios when managing reports of incidents

Manage internally	Early Help	Referral to Children's social Care	Report to Police
-------------------	------------	------------------------------------	------------------

- The relevant paragraphs in KCSIE 2024 are:
  - 487, risk assessment;
  - 538, safeguarding and supporting the victim;
  - 548, safeguarding and supporting the alleged perpetrator(s);
  - 551, sanctions and the alleged perpetrator(s); and
  - 560, safeguarding other children.
- The School will refer to pages 101-2 of KCSIE 2024 with regard to unsubstantiated, unfounded, false or malicious reports and fully follow the recommendations for recording information and responding to such reports.

### **Contextual (Extra-Familial) safeguarding for young people**

The School is aware that as young people grow more independent, they may face more risk from safeguarding threats from outside of the home, either from within the community, at School or from their own peer group. Protecting children from these external risks is known as contextual safeguarding. The School's Safeguarding and Child Protection Policy therefore reflects the needs of young people in their own communities.

The School acts as a protective factor in children's lives. Children who do not attend can become *hidden*, which means that the School is less able to help and protect them. Children who do not attend School may be at further risk of not achieving their educational potential. This could include the following groups:

- Children not attending School nor on the School roll, including children who have been excluded or whose parents have withdrawn them and for whom no suitable alternative provision is arranged.
- Children who fall under the heading 'educated at home', but may not be receiving effective, efficient and suitable education or any education. This includes some children who may not be known to their Local Authority (LA) or any agencies.
- Children attending unregistered schools, sometimes under the guise of being electively home educated.
- Children in alternative provision that is of insufficient quality or is not provided for the required hours.
- Children without a school place in LAs in which the protocols are not working well enough for hard-to-place children.

### **Children who run away or go missing**

Children who run away or go missing from home or care are vulnerable to criminal and/or sexual exploitation. If the School becomes aware of a child who is missing from home or care and that child has not been reported missing to the police, they should call 101.

Running away may be an indicator of other problems and therefore referral to the MASH should be considered. Early intervention after the first episode may prevent a child being exploited.

Statutory guidance on this issue may be found here: [Children who run away or go missing from home or care](#)

### **Child Criminal Exploitation (CCE)**

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

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

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

Whilst age may be the most obvious 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.

Further information on this area can be found in the documents below:

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

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

**KCSIE 2024 states:** “All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos. 8 can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.”

### **Children at risk of Sexual Exploitation (CSE)**

Both Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into criminal or sexual activity in exchange for something the victim needs or wants, and/or for financial advantage or increased status of the perpetrator or facilitator. This abuse can occur with males or females, adults or children and can be a one-off event or a series. CCE and CSE can present differently in girls and boys, as well as having potentially different indicators.

#### **The three main types of CSE**

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

<b>Inappropriate relationships</b> Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.	<b>Boyfriend/Girlfriend</b> Abuser grooms a victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and have sex with multiple men/women and threatened with violence if they try to seek help.	<b>Organised exploitation and trafficking</b> Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men/women. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.
---	--	--

#### Indicators of CSE may include:

Acquisition of money, clothes, mobile phones, etc without plausible explanation	Gang-association and/or isolation from peers/social networks	Suspension, exclusion, or unexplained absences from school, college or work	Leaving home/care without explanation and persistently going missing or returning late	Excessive receipt of texts or other electronic messages/phone calls
Returning home under the influence of drugs/alcohol	Inappropriate sexualised behaviour for age/sexually transmitted infections	Evidence/suspicious of physical or sexual assault	Relationships with controlling or significantly older individuals or groups	Multiple callers (unknown adults or peers)
Frequenting areas known for sex work	Concerning use of internet or other social media	Increasing secretiveness around behaviours	Self-harm or significant changes in emotional well-being	

#### Potential vulnerabilities

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

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

If the School becomes aware of a child who may be being sexually exploited, they should refer to the MASH.

Further guidance may be found here: [Child sexual exploitation – DfE guidance](#)

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

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

Increased absence	Change in friendship groups	Relationships with older individuals or groups	Decline in educational interest and/or performance
Signs of self-harm or significant change in wellbeing	Signs of assault or unexplained injuries	Unexplained gifts or new possessions	

These may indicate involvement or approach by criminal networks or gangs. The School needs to be alert to the possibility of children and young people bringing weapons onto the site. There are various reasons why a young person may be carrying a weapon. These should be explored with the young person. Under Croydon's weapons in schools protocol, the police must be informed via 101 of any student found in possession of a weapon in School or any weapon that is found on the school site.

Further advice may be found here: [Preventing youth violence and gang involvement](#)

### **Domestic abuse and/or sexual violence (DASV)**

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 physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

### **Operation Encompass**

Croydon is part of the Operation Encompass service which operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have 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.

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. 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](mailto:fjc@croydon.gov.uk)



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

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK ([www.gov.uk](http://www.gov.uk)) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home : Operation Encompass (includes information for schools on the impact of domestic abuse on children)
- Specific guidance on adolescent to parent violence and abuse is published by the Home Office

### Prevention of Radicalisation and Extremism

The School's safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism.

Useful information can be found here: [Promoting fundamental British values as part of SMSC in schools](#)

Under the Counter-Terrorism and Security Act 2015, the School also has a duty to refer young people to Croydon's Channel Panel under the Prevent strategy where there are concerns that they are being radicalised.

Full details can be found here: [The Prevent Duty](#)

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.

### Risk indicators of vulnerable students

**Indicators of an identity crisis include the following:**

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

**Indicators of a personal crisis include the following:**

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

**Indicators of vulnerability through personal circumstances include the following:**

Migration	Local community tensions	Events affecting their country or region of origin
-----------	--------------------------	--

Alienation from UK values	A sense of grievance triggered by personal experience of racism or discrimination	
---------------------------	---	--

**Indicators of vulnerability through unmet aspirations include the following:**

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

**Critical indicators include where the student is:**

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

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

Does the student have access to extremist influences?	Does the student access the internet for the purposes of extremist activities?	Has the student witnessed or become the victim of racial or religious hate crimes?
Does the student vocally support terrorist attacks, either verbally or in their written work?	Is there a pattern of regular or extended travel within the UK?	Does the student have experience of poverty, disadvantage, discrimination or social exclusion?
Does the student have insecure, conflicted or absent family relationships?	Has the student experienced any trauma in their lives, particularly trauma associated with war or conflict?	Is there evidence that a significant adult or other person in the student's life has extremist views or sympathies?
Is the student the victim of social isolation?		

**Educate Against Hate**, 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.

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

The Director of Safeguarding/Designated Safeguarding Lead should be consulted for internal advice on making a referral. Prior to making a referral, the School may also get advice from the police schools' officer the MASH Professionals' Consultation Line and/or Croydon's Prevent Co-ordinator, Haydar Muntadhar (email: [haydar.muntadhar@croydon.gov.uk](mailto:haydar.muntadhar@croydon.gov.uk) or telephone 0208 726 6000 (ext. 62070))

#### Additional procedures

Tom Stead (Senior Pastoral Manager) is a Deputy Designated Safeguarding Lead and has particular expertise in this area. Internal advice may be sought from him, in conjunction with the Director of Safeguarding/Designated Safeguarding Lead. Certain Deputy DSLs are trained to deliver Prevent awareness training to other members of staff. The School also has a Prevent Risk Assessment, which reflects the local situation in Croydon.

#### Mandatory reporting of Female Genital Mutilation (FGM)

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

#### Risk factors for FGM include:

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

#### Symptoms of FGM

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

#### Indications that FGM may have already taken place may include:

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

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

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

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

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

**Breast Ironing** is practised in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breasts to stop them growing further. Breast Ironing is usually carried out by mothers or other women to protect girls from men. It is believed that the reason they carry out this procedure is to reduce the risk of sexual harassment, rape, kidnap and forced marriage. Indicators that Breast Ironing has been carried out are chest pains or other discomfort, changes in behaviour and fear of undressing.

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

Further advice on forced marriage can be obtained from the Foreign and Commonwealth Office's Forced Marriage Unit by phone 0207 008 0151 or emailing [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk). Detailed information may be found here: [Forced marriage - FCO Guidance](#)

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

#### **Modern Day 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 is available in the [Modern Slavery Statutory Guidance](#).

#### **Children Requiring Mental Health Support**

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

Information can be found in the [Mental health and behaviour in schools guidance](#).

Children who have experienced abuse and Adverse Childhood Experience (ACEs) including traumatic events are likely to be impacted. Only appropriately trained professionals should make diagnoses. The additional documents listed below may also assist in supporting children and young people. 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](#).

## Online Safety

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 risk to children online, but they can be categorised within these four areas as stated on P38 of KCSIE 2024:

<p><b>content:</b> being exposed to illegal, inappropriate or harmful content e.g. pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism</p>	<p><b>contact:</b> 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><b>conduct:</b> 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><b>commerce:</b> risks such as online gambling, inappropriate advertising, phishing and or financial scams. If the School feels that students or staff are at risk, it should report this to the Anti-Phishing Working Group (<a href="https://apwg.org/">https://apwg.org/</a>).</p>

The DfE published [Teaching Online Safety in Schools](#). As a result, the School recognises the importance of reporting and acting on online safety concerns within the Safeguarding and Child Protection 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.

Students should be just as clear about what is expected of them online as offline. A recommended framework published by UK Council for Child Internet Safety (UKCCIS) supports the delivery of online safety: [Educated for a Connected World](#)

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

Other websites that can assist are:

[Be internet legends](#)  
[PSHE Association](#)  
[ThinkUKnow](#)  
[Safer Internet centre](#)  
[360 Safe Website](#)

## Remote Education

Where children are being educated online at home the DfE has provided advice to support schools and colleges to do so safely [here](#). The NSPCC and PSHE Association also provide helpful advice, which can be found on their websites.

## Filtering and Monitoring

On Pages 39-40, KCSIE 2024 states that “Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children’s exposure to the above risks from the school or college’s IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.”

The appropriateness of 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. SWGfL has also created a tool to check whether filtering blocks content of a sexual, terrorist or child abuse nature.

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

The School will

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

Further guidance on filtering and monitoring can be found [here](#) and on Pages 40-41 of KCSIE 2024

## Reviewing Online Safety

Due to ever evolving technology and associated risks, the Schools ensures that it is aware of the rapid changes and has regular reviews of its approach to online safety. The School’s Online Safety Policy is reviewed annually so that it reflects the current risks children face online. The Director of Safeguarding/Designated Safeguarding Lead meets each term with the School’s Safeguarding Governor to review safeguarding and child protection matters, including online safety. Each term, she also reports to the Governors on safeguarding matters, including online safety.

KCSIE 2024 also provides the following advice which schools can refer to:

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

## Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either “cyber-enabled” (crimes that can happen 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’) e.g. 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' i.e. 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. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note: Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety.

Additional advice can be found at: [Cyber Choices](#)

### **Looked After Children and Children with Care Experience**

The School recognises that looked after children and children with care experience are particularly vulnerable due to their status and their pre-care experiences.

At the time of writing, the School's designated member of staff for Looked After Children and Children with Care Experience is the Director of Safeguarding/Designated Safeguarding Lead. She has specialist knowledge of the issues faced by this cohort and is able to advise other colleagues.

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.

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

#### **Additional procedures**

The School is aware of the new duty to promote the education of previously looked after children. These are defined as children who have left the care system as a result of adoption or special guardianship order. It is recognised that these children may face the same difficulties and have the same vulnerabilities as Looked After Children.

The School also considers the potential vulnerability of relevant children. These are children who, under the Leaving Care Act, are aged 16-17 and who were but are no longer looked after. The School's Counselling Service Lead is able to offer specific support in such circumstances.

Many looked after young people in Croydon who are aged 16 and 17 may be living in semi-independent accommodation and are particularly vulnerable to a wide range of safeguarding issues. It is imperative that the Director of Safeguarding/Designated Safeguarding Lead receives information about these young people when they join the School.

### **Children who are lesbian, gay, bi, trans (LGBT)**

*(Please note this section remains under review pending the gender questioning children guidance consultation.)*

Children being LGBT is not a safeguarding concern in and of itself, but it is important to be aware that they can be targeted by others. This can increase the vulnerability of these children. It is important to consider helping LGBT

children to identify a trusted adult whom they can talk to, as well as to provide safe places within School to talk about their concerns. LGBT inclusion is part of [Relationships Education and Relationships and Sex Education curriculum](#). It is also part of the School's Ideatum Curriculum. There is a range of support available to help schools address homophobic, biphobic and transphobic bullying and abuse.

For guidance around managing a situation where there is gender questioning, please see P55 KCSIE 2024

### Children with Special Educational Needs and Disabilities (SEND)

The School is aware that children with Special Educational Needs and Disabilities (SEND) may face increased risks of harm and abuse and may be more likely to experience bullying. They can face additional safeguarding challenges for the reasons listed below.

There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.	Children with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs.
Difficulties may arise in overcoming communication barriers.	There may be a higher risk of peer group isolation.

The School's policies reflect these issues and recognise that staff need to support this group to overcome barriers to seeking help. The School should also identify students who might need more support to be kept safe or to keep themselves safe.

Further information can be found in the department's: [SEND Code of Practice 0 to 25 years](#), and [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.

### Private Fostering – Local Authority Notification

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a "close relative" for 28 days or more. Examples of close relatives are aunts, uncles and grandparents. Those who are not close relatives include cousins, great-aunts and neighbours. Schools have a legal duty to notify Croydon of any students they know to be privately fostered. The Director of Safeguarding/Designated Safeguarding Lead (or her deputy) should refer to the MASH any private fostering arrangements that come to their attention.

### Why are children in Private Foster Care?

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

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

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

No, the term 'Looked After Children' means children who are looked after by the Local Authority. Privately fostered children are outside the care of the Local Authority. The School does not therefore code children in private foster care as 'LAC'.



### **Children staying with host families (homestay)**

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. Paragraph 341 of KCSIE has further definition around this. In some cases where the family is within the UK, this could amount to private fostering under the Children's Act 1989 (see above).

### **Young Carers**

If the Schools has concerns about a student whom we believe to be a young carer, we can contact the Young Carers Service on 0208 649 9339.

### **Fabricated or Induced Illness**

Fabricated or Induced Illness (FI) 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.

### **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 evicted from a property. The Homelessness Reduction Act 2017 places a legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help, including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

### **Children with family members in prison**

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

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed and there are two [age-appropriate guides](#) to support children. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be 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. This may be useful for some parents and carers.

### **Children who are absent from school or missing from education**

The School is aware of those children who are absent from School for prolonged periods and/or on repeated occasions as this may be an indicator of welfare concerns. Multi-agency working is essential when children are absent 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. P48 of KCSIE 2024 provides the following recommendations:

- Guidance on school attendance '[Working together to improve school attendance](#)' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and

non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).

- further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#).
- general information and advice for schools and colleges can be found in the Government's [Missing Children and Adults Strategy](#).

### **Elective Home Education (EHE)**

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.

From September 2016 the Education (Student Registration) (England) Regulations 2006 were amended so that the School must inform the Local Authority of all deletions from their admission register when a child is taken off roll. Where a parent or carer has expressed their intention to remove a child from the School with a view to educating at home, the Local Authority, the Schools, and other key professionals should work together to coordinate a meeting with parents or carers, where possible. Ideally, this would be before a final decision has been made, 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.

DfE guidance for local authorities on [Elective home education](#) sets out the role and responsibilities of Local Authorities and their powers to engage with parents in relation to EHE. Although this is primarily aimed at Local Authorities, the School should also be familiar with this guidance.

### **Opportunities to Teach Safeguarding**

The Governors should ensure that the School provides opportunities for children to learn about Safeguarding. General issues may be addressed through the broad and balanced curriculum already in the School but key issues relevant to the School community and sensitive issues may be taught through Relationships Education (in Year 6) and Relationships and Sex Education (Years 7 and above).

Please refer to the School's RSE Policy to understand how Whitgift teaches this. DfE documents can be found [here](#).

The following resources may also help schools and colleges understand and teach about safeguarding:

[Teaching about relationships sex and health](#)

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

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

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

[UKCCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors](#)

[National Crime Agency's CEOP education programme: Thinkuknow](#)

### **The Child's Wishes**

The best interests of the child should always be at the heart of any decision-making process around safeguarding. The Governors of the John Whitgift Foundation and school leaders should always make sure the child's wishes and feelings are taken into account when decisions for support are made, and actions taken.

## Other relevant safeguarding guidance

The School can access additional guidance, policies and procedures at:

[CSCB local policies and procedures](#)

[DfE Alternative Provision guidance](#)

[DfE School Attendance Parental Responsibility Measures guidance](#)

[DfE Behaviour in Schools guidance](#)

[DfE Preventing and Tackling Bullying guidance](#)

[DfE and ACPO Drug Advice for School guidance](#)

[DfE Advice for Schools on Equality Act 2010](#)

[DfE Supporting students at school with medical conditions](#)

[DfE Mental health and behaviour in schools](#)

[DfE Use of reasonable force guidance](#)

[DfE Promoting fundamental British values as part of SMSC in Schools](#)

[DfE Children who run away or go missing from home or care](#)

[Child sexual exploitation – DfE guidance](#)

[Preventing youth violence and gang involvement](#)

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

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

[Preventing and tackling Bullying](#)

[Promoting children and young people's emotional health and wellbeing](#)

[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, parents and carers](#)

[Domestic Abuse: Various information/Guidance](#)

[Faith Based Abuse](#)

[Homelessness: how local authorities should exercise their functions](#)

[Private Fostering](#)

[Upskirting: know your rights](#)

## **PART 2      Responsibility of Governors, Proprietors and Management**

### **The Role of the John Whitgift Foundation as Proprietor**

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

Legislation and the Law which Governing Bodies and proprietors adhere to, can be found on pages 23-26 KCSIE 2024.

### **The Role of the Governors**

The Governors will ensure that the School meets its statutory duties with regard to safeguarding and protecting students and that the following are in place:

- The Safeguarding and Child Protection Policy and procedures covering 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 covering 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
- The School is able to work 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
- A member of staff is appointed as the Designated Manager to address allegations against School staff
- 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 is appointed as the Designated Safeguarding Lead with responsibility for carrying out the statutory duties as set out in this policy; the individual is given sufficient time and resources to carry out their responsibilities; and that another member of staff is appointed to deputise in their absence
- There is a designated member of staff nominated to promote the educational achievement of Looked After Children, previously Looked After Children and Children with Care Experience. This person should receive 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.

## The Role of the Headmaster

The Headmaster will ensure that the School meets its statutory safeguarding duty by ensuring the following:

- Staff are inducted thoroughly and have read the School's Safeguarding and Child Protection Policy and Keeping Children Safe In Education (including Annex B). Staff should also be aware of the School's Behaviour, Discipline and Exclusion Policy and the Missing Student Procedure, which has regard to the CSCP Children Missing from Education Policy. Thus, all staff will be fully aware of their role in safeguarding children and will fully implement policies.
- All staff are able to identify those children who need extra help and know how to make, or request, appropriate referrals to Early Help services.
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns, and know how to make, or request, appropriate referrals to children's social care.
- Staff are able to work in partnership with other agencies to safeguard children, including providing Early Help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- Staff are encouraged to attend learning events and participate in audit activity provided by the Safeguarding Children Partnership as well as promote published learning from events and serious case reviews.
- A designated manager is appointed to manage allegations against staff
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.

- The School offers a safe environment for staff and students to learn.
- Safeguarding issues are brought to the attention of the governing body.

### **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 (LADO)
- taking responsibility for those children who are not in education, including children who are known to be home educated.

## **PART 3 Safer Recruitment**

### **General Principles**

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

The school is aware of the following central government guidance:

[Criminal records checks for overseas applicants - Publications - GOV.UK](#)

[Employing overseas-trained teachers from outside the EEA - Publications - GOV.UK](#)

[Disqualification by Association](#)

[DBS and Filtering](#)

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

**Please refer to the School's Safer Recruitment Policy for full details.**

## PART 4 Safeguarding Concerns and Allegations Against a Member of Staff

### Conduct and safe teaching practice

- The School expects staff and volunteers to set a good example to students through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.
- Procedures are in place for the two areas of allegation, those that MAY meet the threshold of harm and those that DO NOT meet the harm threshold (known as ‘low-level concerns’).
- The Headmaster will ensure that there is a written code of conduct in place and that each member of staff, including volunteers, signs a code of conduct agreement on appointment that sets out the School expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies.
- Governors will have their own separate code of conduct. This is a responsibility of the governing board or trust.
- Staff will be expected to follow the Schools social media policy in terms of their use of social media, particularly in relation to professional standards and relationships with students and/or their families. All staff and volunteers will sign an acceptable use agreement before being given access to the School computer system.

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

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

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

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

### Allegations that meet the harms threshold

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

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

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

This applies to any child the member of staff/volunteer has contact within their personal, professional or community life. The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification. It is important not to make assumptions.



Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Headmaster. If the concerns are about the Headmaster, the Chair of Governors should be contacted.

The Headmaster will always consult the Local Authority Designated Officer (LADO) immediately the School is aware of an allegation. This responsibility may be delegated to the Director of Safeguarding/Designated Safeguarding Lead.

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

Further Inquiries	immediate referral to the Police
consideration of disciplinary proceedings	consideration of a senior strategy meeting

*Looking after the welfare of the child* - the Director of Safeguarding/Designated Safeguarding Lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the Local Authority children's social care as described in Part one of this guidance.

*Investigating and supporting the person subject to the allegation* - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

It is important to bear in mind that although the concern may relate to an individual student, other students may also be at risk. The procedures in 'Safeguarding Children and Safer Recruitment in Education' (DfE, 2006 – Updated 2011), Working Together to Safeguard Children (Dec 2023) and Guidance for local authorities, Headmasters, school staff, governing bodies and proprietors of independent schools" (DfE 2011) will be followed in such cases.

When appropriate (*see guidance above*), consideration will be given to referral of a member of staff to the DBS for consideration of the case. If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the Local Authority Designated Officer (LADO) to give support and direction on how to proceed.

All procedures set out in Part 4 of KCSIE 2024 will be adhered to alongside previously mentioned documents and used as guidance when managing allegations of any kind.

Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK.

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

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

### **Allegations Against Staff and Volunteers, including supply staff**

Agencies are encouraged to ensure that they have a **code of conduct** in place which clearly includes references to behaviours/relationships between people in a position of trust and those for whom they are responsible that are

over the age of 18; this includes the **need for “low level” concerns to be discussed with the LADO and for them to be recorded.**

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

### **Low-level Concerns**

As part of our whole-school approach to safeguarding, Whitgift strives to promote an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) can be raised and dealt with promptly and appropriately. Creating a culture in which all concerns about adults or their behaviour towards children, (including allegations that do not meet the harms threshold (see Part 4 below)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This should enable the School to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse, and ensure that adults working in or on behalf of the School are clear about professional boundaries.

#### **What is a low-level concern?**

The term “low-level” concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold set out in KCSIE 2024. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the School may have acted in a way that is not quite right. This may be that they are inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work. Their behaviour may not meet the allegations threshold or is otherwise not considered by the LADO to be serious enough to consider a referral. It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the Schools from potential false allegations or misunderstandings.

In Croydon, all low-level concerns should be shared with the Local Authority Designated Officer (LADO) and recorded for future reference to identify any potential patterns of inappropriate behaviour. All records should be kept securely and confidentially and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

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

### **Organisations or Individuals using school premises**

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 should follow safeguarding policies and procedures, including informing the LADO.

### **Whistleblowing**

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

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

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

Where it is not possible to raise concerns within the School, staff and volunteers may report concerns to the following.

- Croydon's lead officers for child protection or safeguarding where there are issues regarding the welfare of a student.
- The following contact details can be used where there are issues regarding the School's overall procedures around safeguarding
  - Croydon Council's confidential whistle blowing email address
  - [schoolwhistleblowing@croydon.gov.uk](mailto:schoolwhistleblowing@croydon.gov.uk)
  - the NSPCC whistleblowing advice line on **0800 028 0285** is open from 8 am – 8pm Monday –Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

The Headmaster is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and students.

- The CSBC has an [escalation policy](#) which can be used by staff in school settings
- The John Whitgift Foundation also has its own Whistleblowing Policy which is available on its website.

#### **Additional Policies**

The School has in place policies to address its responsibilities under the Sexual Offences Act 2003 and to ensure that staff adhere to expected guidance on professional and personal standards of conduct and behaviour. **Please refer to the Staff Code of Conduct for details.**

The School also fulfils its obligations under data protection legislation. **Please refer to the Data Protection and Privacy Policy for details.**

The School issues staff with guidance about contact and communication with students and parents, including electronic communication. **For full details, please refer to the Online Safety Policy and the Social Media and Communications Policy.**

Staff also receive guidance on behaviour management and physical contact with students. **Please refer to the Behaviour, Discipline and Exclusions Policy and the Use of Reasonable Force Policy for full details.**

Staff also receive guidance on supporting students with medical conditions, including in emergency situations, and on the administration of medicines. **Please refer to the Whitgift Health Care Policy and other related policies.**

#### **Behaviour management, physical intervention and reasonable force**

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

There are occasions where it may be appropriate for staff in 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. Guidance for schools and colleges can be found [here](#). It is believed by the department that a ‘no-contact’ policy leaves staff at risk of being unable to fully safeguard students in extreme circumstances.

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

Please refer to the School’s Reasonable Force Policy for full details.

### **Music tuition**

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

## PART 5 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 the government guidance ([link below](#)). 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.

### [Health and safety: Advice on legal duties and powers](#)

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
- 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

## Annex 1: The Role of the Director of Safeguarding/Designated Safeguarding Lead

The role of the Director of Safeguarding/Designated Safeguarding Lead and her Deputies is to take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) within the School and to be available during school hours for staff to discuss safeguarding concerns. This role is explicit within her job description and the Director of Safeguarding/DSL is a member of the Senior Leadership Team.

The Director of Safeguarding/DSL (and her deputies) will:

- Liaise with and manage referrals to relevant agencies, such as Children's Social Care, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS).
- Keep the Headmaster informed of ongoing safeguarding and child protection issues and enquiries, especially section 47 enquiries.
- Provide advice and guidance for staff on safeguarding and child protection issues and manage referrals. This includes liaison with the police where a crime may have been committed. [This guidance](#) should help the School to understand when to consider calling the police and what to expect when working with them.
- Ensure the School's Safeguarding and Child Protection Policy and related policies and risk assessments are up to date and consistent with Croydon's Safeguarding Children Board policies, and that policies are reviewed annually or biennially, according to the School's protocol.
- Ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them. These include KCSIE Part 1 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. They will be a point of contact for advice and support for staff as well as safeguarding partners.
- Attend regular training, including Prevent awareness training, and the designated teachers' meetings hosted by Croydon and the Safeguarding Children Board to keep up to date with new policy, emerging issues and local Early Help, safeguarding and child protection procedures and working practices.
- Work with the Headmaster and relevant colleagues, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues.
- Provide timely updates to all staff members and Governors on any changes in safeguarding or child protection legislation. Meet regularly with the Safeguarding Governor to the School 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.
- Liaise with the School's Designated Mental Health Lead, where safeguarding concerns link to mental health.
- Have an awareness of those children who may be in need, young carers and of those who have Special Educational Needs and Disabilities (SEND), and liaise with the Head of Learning Support/SENDCo when considering any safeguarding action for a child with SEND.

- Liaise with the designated member of staff for Children Looked After and Children with Care Experience (if they are not this colleague) whenever there are safeguarding concerns relating to a looked after child, a previously looked after child, or a child with care experience.
- Oversee child protection systems within the School, including the management of records, standards of recording concerns and referral processes.
- Provide a link between the School and other agencies, particularly children's social care and the Croydon Safeguarding Children Partnership.
- Ensure staff, including temporary staff, receive appropriate safeguarding and child protection training, at least every 2 years.
- Ensure parents are fully aware of the relevant School policies and procedures and that they are kept informed and appropriately involved.
- Ensure 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.
- Store all records securely, ensuring they are kept up to date. (It is good practice to keep a separate child protection file.)
- Ensure relevant records are passed on appropriately when children transfer to other institutions and where appropriate, share relevant information with schools or colleges to enable continued support for the child on transfer. The School will gain a receipt when passing files to a new school or college. This should be within 5 days of transfer.
- Ensure 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.
- With senior Deputy DSLs, participate 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](mailto: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.

FULL Details of the role of the designated safeguarding lead and deputy can be found in Annex C of KCSIE 2024. It is important that the DSL and DDSLs are fully aware of their role and have capacity to carry out all areas of this.

## Annex 2: Child Protection – Definition and Indicators

### Definitions

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

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

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

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

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

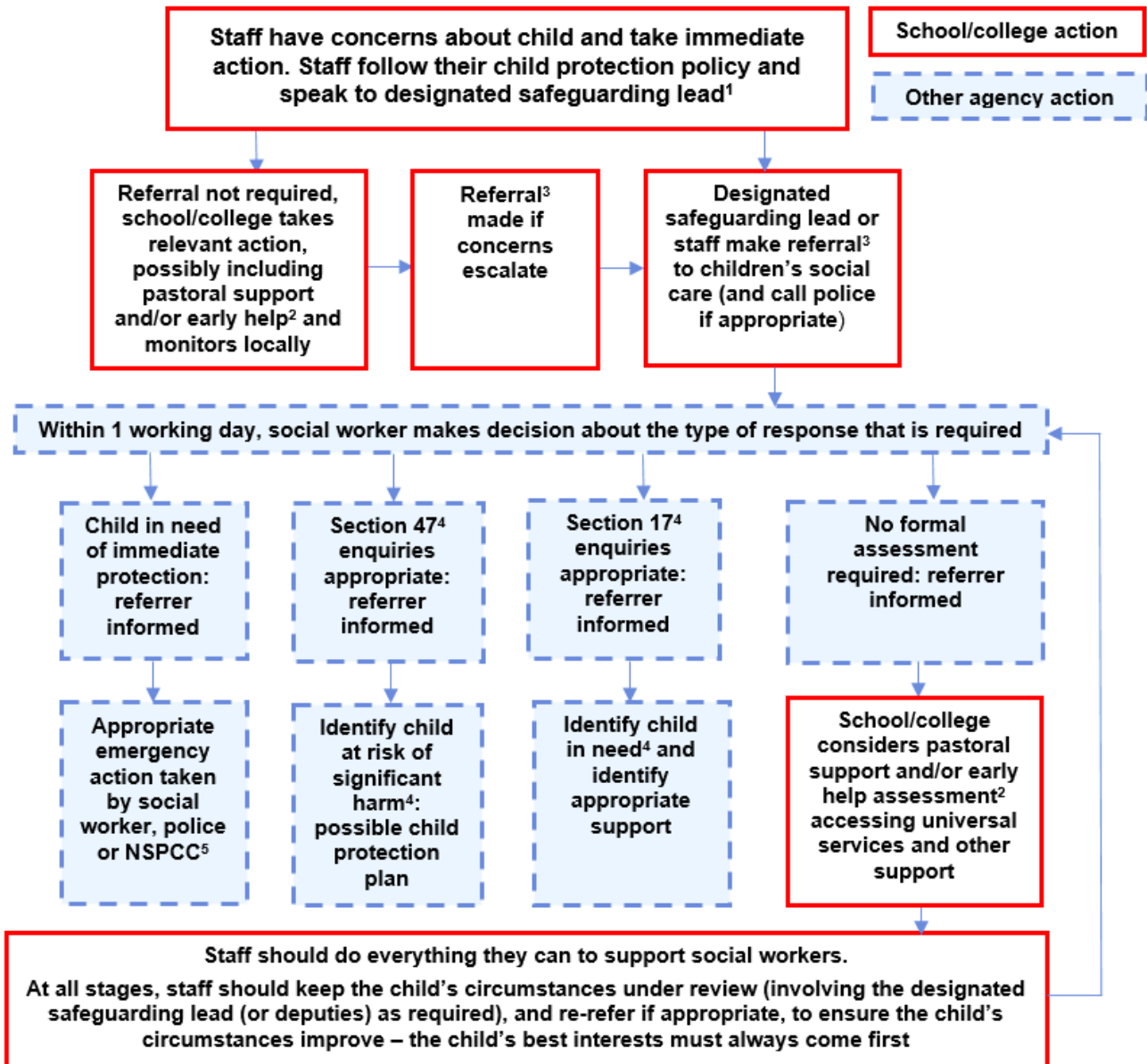
### Possible indicators of abuse and neglect

<b>Neglect</b>	<ul style="list-style-type: none"> <li>• Inadequate or inappropriate clothing</li> <li>• Appears underweight and unwell and seems constantly hungry</li> <li>• Failure to thrive physically and appears tired and listless</li> <li>• Dirty or unhygienic appearance</li> <li>• Frequent unexplained absences from school</li> <li>• Lack of parental supervision</li> </ul>
<b>Physical abuse</b>	<ul style="list-style-type: none"> <li>• Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury</li> <li>• Injuries in unexpected places or that are not typical of normal childhood injuries or accidents</li> <li>• High frequency of injuries</li> <li>• Parents seem unconcerned or fail to seek adequate medical treatment</li> </ul>
<b>Sexual abuse</b>	<ul style="list-style-type: none"> <li>• Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child’s age/stage of development</li> <li>• Sexual risk taking behaviour including involvement in sexual exploitation/older boyfriend</li> <li>• Continual, inappropriate or excessive masturbation</li> <li>• Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy</li> <li>• Unwillingness to undress for sports</li> </ul>
<b>Emotional abuse</b>	<ul style="list-style-type: none"> <li>• Developmental delay</li> <li>• Attachment difficulties with parents and others</li> <li>• Withdrawal and low self-esteem</li> </ul>
<b>Indirect indicators of abuse and neglect</b>	<ul style="list-style-type: none"> <li>• Sudden changes in behaviour</li> <li>• Withdrawal and low self-esteem</li> <li>• Eating disorders</li> <li>• Aggressive behaviour towards others</li> <li>• Sudden unexplained absences from school</li> <li>• Drug/alcohol misuse</li> <li>• Running away/going missing</li> <li>• Absence from school</li> </ul>
<b>Parental attributes</b>	<ul style="list-style-type: none"> <li>• Misusing drugs and/or alcohol</li> <li>• Physical/mental health or learning difficulties</li> </ul>



	<ul style="list-style-type: none"><li>• Domestic violence</li><li>• Avoiding contact with school and other professionals</li></ul>
--	--

### Annex 3: Actions where there are concerns about a child (P24 KCSIE 2024)



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

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

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

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

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

## Annex 4: Decision Making Check list [for Senior Leaders]

**Date and Time:** \_\_\_\_\_

**Is the matter:**

- |   |                          |
|---|--------------------------|
| Disciplinary (Adrian Norris/Richard Martin) | <input type="checkbox"/> |
| Safeguarding (Ally Tiltman)                 | <input type="checkbox"/> |
| Wellbeing/Pastoral (Dayle Kirby)            | <input type="checkbox"/> |
| Academic (William Munks)                    | <input type="checkbox"/> |

Ensure member of staff is sent to the right person from the outset. Only Assistant Head (Pastoral & Boarding), Proctor, Senior Pastoral Manager, Director of Safeguarding/DSL, Deputy Head (Pastoral) or Deputy Head (Academic) should bring matters to the Senior Deputy.

**Student Name(s) and Year Group(s):**

1)

2)

3)

4)

**Brief summary of issue**

---



---



---

**What options are there?**

- 1 \_\_\_\_\_
- 2 \_\_\_\_\_
- 3 \_\_\_\_\_
- 4 \_\_\_\_\_

**Are there any mitigating circumstances and have these been considered** (e.g SEND/ Medical, Care List, HoY Comments, Attendance, previous disciplinary record)

**What decision has been reached and why?**

**Do any of the following need to be notified?**

- |  |                          |
|--|--------------------------|
| Headmaster or Chair of Gobs or Safeguarding Governor     | <input type="checkbox"/> |
| LADO (Steve Hall)  | <input type="checkbox"/> |
| Senior Deputy or Deputy Head (Academic or Pastoral)      | <input type="checkbox"/> |
| Head of Learning Support Department (Kirstie Richardson) | <input type="checkbox"/> |
| Wider SLT  | <input type="checkbox"/> |
| Director of Section/Head of Year/Tutor                   | <input type="checkbox"/> |
| Senior Boarding Housemaster                              | <input type="checkbox"/> |
| Parents of student                                       | <input type="checkbox"/> |

**Where must it be recorded?**

- |                 |                          |
|-----------------|--------------------------|
| Student file(s) | <input type="checkbox"/> |
| iSAMS           | <input type="checkbox"/> |
| CPOMS           | <input type="checkbox"/> |
| Other           | <input type="checkbox"/> |

**Signed by:** \_\_\_\_\_

**Role:** Headmaster/ Senior Deputy / Deputy Head Pastoral/ Director of Safeguarding/ Deputy Head Academic/ Assistant Head Pastoral & Boarding/ Proctor/ Senior Pastoral Manager/ Director of Section

## Annex 5: 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.

7. 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

8. 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.