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Our Core Values
Success
Unity
Pride
Enjoyment
Respect

Model Safeguarding Policy for Schools, Colleges and other Education Settings in Croydon

Adopted at Beulah Junior School September 2026

Approved by:	Full Governing Board	**Date:** September 2026
Next review due by:	September 2027	

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Key contacts

School/college

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Designated safeguarding lead(s):
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Deputy designated safeguarding lead(s):
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Name: Rosemond Ofosuhene
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Designated CLA teacher:
Name: Rosemond Ofosuhene
Contact details: rofosuhene306@lgflmail.org
Nominated governor for safeguarding:
Name: Karinia Buitrago
Contact details: office@beulah-jun.croydon.sch.uk

London Borough of Croydon

Local Authority Designated Officer (LADO):

LADO@croydon.gov.uk

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

MASH (Multi-Agency Safeguarding Hub):

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

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

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

Croydon Safeguarding Children Partnership (CSCP)

Website: https://www.croydonsafeguarding.org/
Email: CSCP@croydon.gov.uk
Tel: 0208 604 7275

Core operational policies and procedures

Purpose and Aims of this policy

This is statutory guidance from the Department for Education (the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). Schools and colleges in England **must** have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children include everyone under the age of 18 (KCSIE 2026). KCSIE also applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021

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

Aims

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

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

PART 1 Safeguarding Information for ALL Staff

Induction and training

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

- All staff will be asked to confirm that they have received, read, and understood all relevant staff policies, including part one of *Keeping Children Safe in Education 2026 (part 1 page 8-27)*
- The designated safeguarding lead will ensure that all staff are fully informed about the school/college child protection procedures and that they receive safeguarding and child protection training on two yearly bases as a minimum. This will include online safety and AI.
- The head teacher will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
- School/college staff and governors will receive multi-agency safeguarding training at the level that is appropriate to their roles and responsibilities.
- As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive specific training on their role and other relevant multi-agency training courses.
- Schools/college staff be able to distinguish between universal services and community-based early help; targeted early help delivered through family help/first including section 17 children in need services, section 47 child protection enquiries, section 20 accommodation and section 31 care and supervision orders. Staff should be able to understand the local criteria, levels of need and processes for each section.
- School and college staff will receive regular and timely updates on child protection and safeguarding concerns via the designated safeguarding lead in order to ensure they remain up to date with new legislation for example, via email, e-bulletins, and staff meetings.
- **All** staff should know the procedure if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- **All** staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. They should never be made to feel they are a problem or feel ashamed.
- **All staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

Early help

Any child can benefit from extra support before statutory services become involved. This may include support through universal services, community-based Early Help, or targeted Family Help. All school and college staff should be aware of the signs that a child may need additional support.

A child who is disabled or has certain health conditions and specific additional needs • has special educational needs (whether or not they have a statutory Education, Health and Care plan)	The child has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.	is at risk of honor or faith-based abuse such as Female Genital Mutilation or Forced Marriage.
If the child has a mental health need.	Child is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.	Privately fostered children.
Young carers.	risk of being radicalised into terrorism.	Children who frequently go missing from home, education or care.
is pregnant and/or is a parent themselves	Child has a parent or carer in custody or is affected by parental offending.	
exhibiting early signs of abusive, violent and/or harmful behaviors.	family circumstances presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.	
showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.	Children who are misusing alcohol or other drugs themselves.	

If the child requires early help support the school/college will make a referral to the Multi Agency Safeguarding Hub (MASH) or family hubs. Staff will consult with parents *prior* to making any referral this will be to discuss the matter and **gain consent** to refer to the child (**early help is consent based only**).

- Where the child is receiving early help support, the school/college will work as part of the team around the child/family and take up the role of lead professional where this is appropriate.

- Early help provision should be monitored and reviewed to ensure the outcomes for the child are improving. If the school/college believes that this is not the case, consideration should be given to stepping the case up for statutory social care intervention.

Child Protection

The school and college will carry out its duty to safeguard pupils which is:

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

For a list of definitions and indicators of abuse and neglect, see Annex 3.
The Croydon Safeguarding Partnership threshold document can be found here Thresholds.

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

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

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

The school/college will seek advice from the MASH line or education safeguarding lead to help make decisions on the child's level of need and the appropriate service to refer to for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making a referral.

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

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

Staff will also share relevant information and work collaboratively with other agencies to ensure a coordinated and effective response that supports the family and addresses the child's needs. The information sharing duty is under consultation and will apply from September 2026; this duty will give clear robust guidance on sharing safeguarding information. This will replace the DFE's existing guidance on information sharing.

Referral for statutory social work intervention

When there are concerns about a child's welfare, staff must act immediately by seeking advice from the Designated Safeguarding Lead or their deputy, who are likely to have the most comprehensive understanding of the child's safeguarding context.
Following consultation, the DSL will determine whether a referral to children's social care via MASH is required. Children's social care assessments should consider harm occurring outside of the home, it is essential that schools and colleges provide detailed and relevant information during the referral process. This supports a more comprehensive assessment and enables a contextual safeguarding approach to identify and address extra-familial risks: Contextual Safeguarding.

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

MASH will inform the school/college of the outcome of all referrals they make and what action children's social care will be taking. This may include any of the following:

- Child in Need (CIN) Assessment – Section 17, Children Act 1989, applied when the child is unlikely to achieve or maintain a reasonable standard of health or development without support (including

children with disabilities). Children's Social Care undertakes a full assessment to coordinate services for the child/family.

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

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

- Families may also be referred to community-based early help or signposted to universal services.



KCSIE 2026 P27

Children who need a Social Worker

Some children have a social worker because there are concerns about their safety or wellbeing, such as neglect, abuse, or difficult family circumstances. These experiences can make them more vulnerable to harm, so it is important that they receive the right support and protection.
The local authority should let the Designated Safeguarding Lead (DSL) know when a child has a social worker. This helps schools and settings understand the child's needs and make informed decisions that support their safety, wellbeing, and education.

Child protection procedures

Role of school/college

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

Working together to safeguard children *2026*

- Working together to safeguard children

The London Safeguarding Children Board child protection procedures

- London Safeguarding Children Board: Child Protection Procedures

Keeping children safe in education *2026*

- Keeping Children Safe in Education

Croydon Safeguarding Children Partnership local policies and procedures

- **www.croydonsafeguarding.org**

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

In line with these policies and procedures, the school/college will:

- Identify those pupils where there is child protection concerns and make a referral to MASH.
- Attend child protection case conferences to effectively share information about risk and harm.
- Contribute to the development and monitoring of child protection plans as a member of the core group
- Carry out the school's role in implementing the child protection plan and continually monitoring the child's wellbeing and liaising with the allocated social worker as required.

Recognition

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the designated safeguarding lead.
- **Staff should refer to** page 13 onwards in KSCIE regarding indicators of abuse, that may suggest a pupil may be at risk of suffering significant harm.
- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputy and advice sought on what action should be taken. Where required, advice can be obtained from the MASH Line or from the LA education safeguarding lead.
- Concerns may be monitored over time and should be recorded on an online management system.
- 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 this 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

- The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.
- Information should be kept confidential and stored securely.
- It is good practice to keep concerns and referrals in a separate child protection file for each child.
- Safeguarding records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information.

They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice

Records should show:

  - Clear and comprehensive summary of concerns.
  - Details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and the outcome.

- When a child transitions to a new educational provision (including in year transfers), the DSL needs to ensure the child protection file is transferred to the new school or college as soon as possible, within 5 days for an in-year transfer or within 5 days of the new term starting, this should be transferred separately from the main pupil file securely and confirmation of receipt obtained. DSLs should also consider if there is a need to share any key information about the child ahead of their start date. This may assist the new school in planning appropriate support.

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

Dealing with disclosures

- Remaining calm, listening carefully and taking the child seriously. Staff must not express shock, disbelief or judgement, and should accept what the child says without questioning its truth.

- Allowing the child to speak freely in their own words, without interruption or unnecessary questioning.

- Providing reassurance that they have done the right thing by speaking up and making it clear that they are not to blame for what has happened.

- Avoiding promises of confidentiality. Staff should explain that the information will only be shared with those who need to know to help keep the child safe.

- Avoiding leading, probing or investigative questions. Where clarification is necessary, staff should use open questions only and avoid influencing the child's account.

- Refraining from making comments about, criticising or expressing opinions regarding the alleged perpetrator.

- Explaining, in an age-appropriate manner, what will happen next, including who the information will be shared with and the reasons for doing so.

- Making a clear and accurate written record of the disclosure, using the child's own words wherever possible, and reporting the concern to the Designated Safeguarding Lead without delay, in accordance with the school's safeguarding procedures.

DO NOT DELAY

- Tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a lesson to do this.
- Refer as soon as you can this gives more time to offer help to the pupil and family to avoid the situation becoming more serious.
- There is more time for others to protect the pupil.
- The Designated Safeguarding Lead may consult with MASH.

MAKE WRITTEN NOTES

- At the earliest opportunity make a written record of your concerns, these can then be added to your school's formal reporting system - record facts accurately and do not express opinion - these notes will help to ensure accuracy in recalling events later - notes should be legible, signed and dated/time.
- Do not take photographs of any physical injuries, record on a body map on CPOMs, do not use audio to record disclosures.
- Any original notes must be given to the Designated Safeguarding Lead as soon as possible and kept, even if you are using an online reporting system, if you are unable to do this please scan a copy for a digital record.

Referral

- Where possible, a decision on whether to refer a pupil to MASH should be made by the designated safeguarding lead or their deputy following a discussion with the members of staff who has raised concerns. However, this should not delay any referral, and *any* member of staff may make a referral if this is necessary, but staff should discuss the matter with a member of the senior leadership team and take advice from the MASH duty social worker if needed. The designated safeguarding lead should be informed as soon as possible.
- Referrals should be completed using the MASH portal either by the teacher raising concerns or by the designated safeguarding lead. Urgent referrals will be accepted by telephone but must be confirmed in writing via the portal within 24 hours.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case on a "no names" basis with the MASH Line to obtain advice on how to proceed. Alternatively, advice can be sought from the LA Education Safeguarding Lead.
- Parental consent must be sought prior to the referral being made unless seeking consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.

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

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

- If the school/college 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 Mash line or schools can contact the LA education safeguarding lead to escalate.

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

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

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

Monitoring

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

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

- All information will be recorded on the child protection file or similar form, prior to each conference and core group meeting.

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

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

Confidentiality and Information Sharing

KCSIE 2026-Part 145-146 tells us that the data protection laws 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.
If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or deputy).

Further information on information sharing can be found:

- **Chapter 1 – Working Together To Safeguard Children 2026 statutory guidance**
- **Information Sharing: Advice for Practitioners**
- **Information Commissioner's Office**
- **Data Protection Toolkit for Schools**

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

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

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

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

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

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

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

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

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

- If unsure, please read the Seven Golden rules for sharing information.

Working with Parents and Carers

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

- Clearly communicate its statutory safeguarding responsibilities by displaying a safeguarding statement on the school/college website homepage and making all relevant safeguarding policies available online or upon request.
- Provide regular opportunities for parents and carers to discuss concerns with class teachers and other appropriate members of staff.
- Involve parents and carers in the development and review of school/college policies, ensuring that their views are considered where appropriate.
- Maintain a clear and accessible complaints procedure for addressing concerns raised by parents and carers.
- Offer advice and signpost families to appropriate services and support where pupils require additional assistance. Schools and colleges should also refer to the DfE guidance, Understanding and dealing with issues relating to parental responsibility.

Multi-agency Working

The school/college is committed to working in partnership with relevant agencies to fulfil its statutory duties under Section 11 of the Children Act 2004 and in accordance with Working Together to Safeguard Children (2026).

The school/college recognises its essential role in safeguarding children and will actively cooperate with the Croydon Safeguarding Children Partnership (CSCP) to support effective multi-agency working and improve outcomes for children and young people in Croydon.

Inspection

Since September 2019, Ofsted has assessed the effectiveness of safeguarding as part of its inspections.

Updates to the education inspection materials under the renewed education inspection framework (EIF). They cover early years settings, state-funded schools, non-association independent schools, further education (FE) and skills providers and initial teacher education (ITE) providers.

Inspections are carried out in accordance with the Ofsted Education Inspection Framework (last updated November 2025). There have been some updates to the inspection toolkit which will come into effect in September 2026.
September 2026 Updates-What you need to know!
Education Inspection Framework

Independent schools are inspected by the Independent Schools Inspectorate (ISI)- ISI will revise the Inspection Framework and Inspection Handbook to remove the reporting of significant strengths and ISI inspection reports will no longer reference significant strengths from September 2026.
ISI Inspection Framework

Safeguarding Issues

The Law- KCSIE 2026 Pages 28-30 sets out legal requirements around safeguarding. These include

The Human Rights Act 1998
Equality Act 2010
Data Protection Act 2018 and UK GDPR and the Data (Use and Access) Act 2025-data protection laws

Regulations and safeguarding requirements relating to school premises

Toilets

Schools must provide separate toilet facilities for boys and girls aged 8 and over, in line with the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014. Toilets designated for one biological sex should not be used by pupils of the opposite biological sex.

When supporting a child who is questioning their gender, schools should consider alternative facilities, such as a self-contained individual toilet, where this can be provided without reducing or compromising single-sex provision.

Any alternative arrangement must protect the safety, privacy, comfort and dignity of the child concerned and of other pupils.

Schools and colleges should keep clear records of decisions made, communicate them appropriately to relevant staff, and review arrangements regularly.

Where mixed-sex toilets are provided in addition to single-sex toilets, schools and colleges should complete an appropriate safeguarding risk assessment. Mixed-sex toilets should consist of individual lockable rooms opening directly onto a public area, such as a corridor.

Changing rooms and Showers.

Schools must provide separate changing rooms and shower facilities for boys and girls aged 11 and over, in accordance with the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

Children must not be permitted to use changing facilities designated for the opposite biological sex, including where a child is questioning their gender.

If a child does not wish to use the changing facilities designated for their biological sex, schools should consider alternative arrangements, such as a fully enclosed, lockable changing room for individual use or access to facilities at a different time, provided this does not compromise single-sex provision.

Any alternative arrangements must protect the safety, privacy, comfort and dignity of the child concerned and of all other pupils.

Child-on-Child abuse

Child-on-child abuse refers to when one child is exploited, bullied, harmed or abused by another child or group of children. It can happen both inside and outside of school or college, including online, and can occur between children of any age or gender.

bullying (including cyberbullying, prejudice-based and discriminatory bullying)	Abuse in intimate personal relationships between children (also known as teenage relationship abuse)	Sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)	Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or Otherwise, causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),	Consensual and non-consensual sharing of nude and semi-nude images and/or videos.	Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. (Voyeurism (Offences) Act 2019.	
Serious physical assault and harm, or the threat of harm with a weapon.	Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.	Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.	

Staff must be familiar with the school's Child-on-Child Abuse Operational Annes (Appendix 5), understand their role in preventing abuse, and respond promptly to any concerns.

Staff should remain vigilant, recognising that the absence of reported incidents does not mean abuse is not occurring. Any concerns, whether on or off site, must be reported immediately to the DSL or Deputy DSL.

All staff have a responsibility to challenge inappropriate, abusive or harmful behaviour between children. Behaviour should never be dismissed as "banter", "part of growing up", or "boys being boys", as this can normalise abuse and discourage children from reporting concerns.

Staff should understand that child-on-child abuse is a safeguarding concern for both the victim and the alleged perpetrator, and that early identification, prevention and timely, evidence-based support are essential to reduce the risk of harm and promote positive outcomes. **KCSIE 2026 Part 30-35.**

Child-on-child sexual harassment and sexual violence

Schools and colleges (including 6th forms) should respond to ***all*** reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or

college premises, and or online (what to look out for, and indicators of abuse are set out in Part one KCSIE 2026).

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

Sexual Violence

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 126-127 KCSIE 2026).*

Where appropriate, the Designated Safeguarding Lead (DSL) or Deputy DSL will liaise with Children's Social Care and the Police to inform the setting's response and ensure safeguarding policies and procedures remain effective.

The DSL and Deputy DSL should be familiar with local specialist support services and know how to access appropriate support for victims, alleged perpetrators, and any other children affected for example Barnardo's and the Lucy Faithfull foundation (more organisations can be found in Annex A page 177)

Consent

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

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

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

Further information on consent can be found HERE.

Sexual Harassment

KCSIE 2026 tells us that when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Examples include:

- sexual comments
- sexual "jokes", taunting and sexual stories
- Lewd comments
- Sexual remarks about clothes and appearance
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes.
- displaying pictures, photos or drawings of a sexual nature
- upskirting and online sexual harassment.

- sharing of unwanted explicit content,
- sexualised online bullying,
- unwanted sexual comments and messages, including, on social media,
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

Harmful Sexual behaviour

This is where sexual behaviour ranges from developmentally 'normal' to inappropriate, problematic, abusive and violent. Harmful Sexual Behaviour is widely used as an overarching term and can happen online or face-to-face. When considering HSB, both ages and the stages of development of the children are critical factors. Full details can be found in KCSIE 2026 Pg 124

Children's sexual behaviour exists on a continuum, ranging from age-appropriate and developmentally expected behaviour to inappropriate, problematic, abusive or violent behaviour.
Behaviour that is problematic, abusive or violent is not developmentally appropriate, may cause harm, and should be recognised and responded to as a safeguarding concern.
Staff should be aware of the difference between normal developmental behaviour and behaviour that may indicate abuse or require intervention, seeking advice from the Designated Safeguarding Lead where concerns arise.

When considering HSB, both ages and the stages of development of the children are critical factors (paragraph 533 pg 124).

Policy

- Schools/colleges recognise that sexual violence and sexual harassment between pupils is a serious safeguarding issue, and such behaviour will not be tolerated. School/college behaviour management and anti-bullying policies will reflect the school/college's approach, and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.

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

- The school/college will take all necessary steps to put in place a planned PHSE curriculum to convey the school/college's policy for preventing harmful sexual behaviour and to promote respectful behaviour between pupils with regards to sexual conduct. The school/college will also make close links to the new Relationships Education Curriculum which is compulsory for all schools; will have until September 2026 to adapt their curriculum.

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

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

- It should be noted that **ALL** reports of sexual harassment and violence should be taken seriously.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- School/college will consult with **Part 5 KCSIE 2026** *(specifically* pages 130-140*)* when managing allegations of child-on-child sexual harassment or sexual violence. School/college will consider the 4 likely scenarios when managing reports of incidents:
  - Manage internally
  - Universal services and community based Early Help assessment
  - Referrals to Family Help – including targeted Early Help and local authority
  - Children's social care
  - Reporting to Police

- Risk assessing (565), safeguarding and supporting victims (619), Safeguarding and supporting the alleged perpetrator (629), sanctioning the alleged perpetrators (633) and safeguarding other children (642), please refer to the relevant paragraphs in KCSIE 2026 for guidance.

- School/college will refer to paragraphs 616-618 with regards to unsubstantiated, unfounded, false or malicious reports and follow the recommendations/guidance stated in this section.

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

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

Contextual (Extra Familial) safeguarding for young people.

The school/colleges are aware that as young people grow more independent, they may face more risk from safeguarding threats from outside of the home, either from within the community, at school/college or from their own peer group. Protecting children from these external risks is known as contextual safeguarding. School safeguarding policies must therefore reflect the needs of young people in their own communities.

Schools/colleges act as a protective factor in children's lives. Children who do not attend can become *hidden*, which means that schools/colleges are less able to help and protect them. Children who do not attend school may be at further risk of not achieving their educational potential. This could include the following groups.

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

Children who run away/go missing

Children who run away or go missing from home, school, college or care may be at increased risk of abuse, neglect, child sexual exploitation, child criminal exploitation, trafficking or other forms of harm. All incidents should be taken seriously, reported without delay to the DSL and managed in accordance with local safeguarding procedures. The school will work with parents/carers and relevant agencies to identify and address the underlying causes of missing episodes, ensuring appropriate support is provided to reduce future risk.

If a child has not been reported missing to the police, school/college should do so using 101.

Persistent missing episodes may be an indicator of other concerns listed above and therefore a referral to MASH should be considered; early intervention is key to prevent a child being exploited.
Children who run away or go missing from home or care

Child criminal exploitation – County lines Page 16

Child Criminal Exploitation (CCE) is a form of abuse where children are manipulated, coerced or exploited into criminal activity for the benefit of others. A common example is county lines, where organised crime groups or gangs exploit children to transport drugs, money or weapons between urban, suburban and rural areas, including coastal towns. Children involved in county lines may frequently go missing for periods of time and may be victims of trafficking for the purpose of criminal exploitation. Repeated missing episodes, unexplained absences, or other indicators of exploitation should be treated as safeguarding concerns and responded to promptly in line with the school's child protection procedures. Like all forms of child exploitation, county lines is a form of abuse, and children should be recognised and supported as victims.

A key indicator of involvement in county lines is when a child or young person goes missing, potentially having been trafficked for the purpose of drug transportation. As with other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person under 18, regardless of gender.
- Can also affect vulnerable adults aged 18 or over
- May still be considered exploitation even if the individual appears to consent.
- May involve coercion through force, enticement, or threats of violence, often accompanied by actual violence.
- Can be carried out by individuals or groups, including males or females, and peers or adults.
- It is usually marked by a power imbalance, with the perpetrator(s) holding power over the victim.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources. If you become aware of a child or young person who may be at risk a referral should be made to MASH.
Safeguarding children who may have been trafficked
Criminal Exploitation of children and vulnerable adults: County Lines guidance

Child Sexual Exploitation (CSE)

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

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

Inappropriate relationships

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

Boyfriend/Girlfriend

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

Organised exploitation and trafficking

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

Indicators of child sexual exploitation may include:

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

Potential vulnerabilities

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

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

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

Serious Violence

Schools and colleges play a vital role in providing a safe, stable and supportive environment for children and young people. Supporting children to develop resilience and increasing their awareness of the risks associated with gangs, child criminal exploitation and serious violence are important aspects of safeguarding and promoting their welfare.

All staff should be aware of the indicators that may suggest a child is at risk of, or involved in, serious violent crime. These indicators should be considered alongside other safeguarding concerns and may include:

- Increased absences from school or college.
- Changes in friendships or peer groups.
- Relationships with older individuals or groups.
- A significant decline in educational engagement, attendance or achievement.
- Signs of self-harm or a significant deterioration in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts, money or new possessions.

These indicators may suggest that a child is being targeted, groomed or exploited by criminal networks or gangs. Staff should remain vigilant, share concerns promptly with the Designated Safeguarding Lead, and respond in accordance with the school's child protection procedures.

Schools and colleges should also be alert to the possibility of children bringing weapons onto the premises. There are many reasons why a child may carry a weapon, including fear, coercion, intimidation or criminal exploitation. Any incident involving a weapon must be treated as a serious safeguarding concern, with the reasons explored and appropriate support provided alongside any necessary disciplinary action.

In accordance with the Croydon Weapons in Schools Protocol, the Police must be notified via 101 of any pupils found in possession of a weapon on school premises or where a weapon is found on the school site.

Further information can be found in the Serious Violence strategy and Annex B of KCSIE 2026.

Domestic abuse and/or sexual violence

Domestic abuse is defined in the Domestic Abuse Act 2021 and includes a range of abusive behaviour, such as physical, emotional, psychological, sexual, economic abuse, and coercive or controlling behaviour, between individuals aged 16 or over who are personally connected.
The Act recognises that children are victims of domestic abuse in their own right if they see, hear or experience its effects.

Domestic abuse can occur in intimate partner relationships, between family members, in teenage relationships, and as child-to-parent or carer abuse. It can affect anyone, regardless of age, gender, ethnicity, sexual orientation or background, and can occur both inside and outside the home.
Exposure to domestic abuse can have a significant and long-lasting impact on a child's emotional, psychological and physical wellbeing, and may affect their behaviour, development and educational outcomes.

Staff should remain alert to the signs of domestic abuse and respond to concerns in accordance with the school's child protection procedures. Where concerns relate to teenage relationship abuse involving children under 18, appropriate safeguarding procedures must be followed, and support provided to both victims and alleged perpetrators where appropriate.

Operation Encompass

Croydon is part of the Operation Encompass protocol.

Since November 2025, the police have had a statutory duty to notify a child's education setting, and where appropriate the local authority, where they have reasonable grounds to believe a child may be a victim of domestic abuse. This includes children who witness, hear, experience the effects of, or are connected to a household where a domestic abuse incident has occurred.

Operation Encompass enables schools and colleges to receive timely information from the police so they can provide appropriate support to children affected by domestic abuse and respond to their individual needs.

Operation Encompass does not replace existing safeguarding procedures. Where there are concerns about a child's welfare, referrals to Children's Social Care should be made in accordance with local safeguarding procedures and thresholds.

The school will ensure that Operation Encompass notifications are managed confidentially by the DSL or Deputy DSL and that appropriate support is provided to affected children.

The duty applies to all children in education from reception (typically aged 4/5) up to the age of 17, and who are enrolled in registered primary and secondary schools, including independent schools, private schools, alternative provision settings (e.g., Pupil Referral Units), as well as further education colleges or 16 to 19 academies in England or Wales (Page 162 KSCIE 2026) **Operation Encompass Guidance**

National Domestic Abuse Helpline

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

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 (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Bromley&Croydon women's aid
- Bambu Project

Prevention of Radicalisation and Extremism

Radicalisation- is the process of a person legitimising support for, or use of, terrorist Violence

Extremism- is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Terrorism- is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. KCSIE 2026 pg166

The Prevent duty

All schools and colleges under section 26 of the Counter terrorism and Security Act 2015, have due regard in the need to protect people from becoming terrorists or supporting terrorism this duty is called the prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. DSL and SLT should familiarise themselves with the revised Prevent duty guidance: especially paragraphs 141-210 Prevent Duty Guidance . The school and college's DSL should be aware of local procedures for making a Prevent referral.

Where a school/college has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a younger pupil may be at risk due to their parent's radicalisation, the school/college should make a referral to prevent via this form Croydon Prevent Guidance and Referral form

Radicalisation risk indicators

4 types of risk level low, at risk, medium and high risk.

Low risk indicators:

- holding strong opinions or values (non-violent or non-extremist)
- Criticising government policies
- Adopting visible signs, for example wearing clothing (non-violent or non-extremist), to express identity or sense of belonging
- being active on social media
- taking a keen interest in national and international affairs
- demonstrating support and supporting causes, for example animal rights (non-violent)
- showing new interest in political ideology or religion

- holding or expressing conservative values or practices, whether traditional, cultural or religious (unless they cause harm to a child or others, for example female genital mutilation**)**

At Risk:

- being drawn to conspiracy theories
- beginning to isolate themselves from family and friends
- viewing or engaging with inappropriate online content and having uncontrolled or unsupervised access to the internet
- expressing concerns about being victimised, for example feeling under attack
- discriminating against other individuals or groups of people
- a sudden change in behaviour
- showing interest in extremists or extreme groups
- expressing views that divide us, for example talking about 'us' and 'them'

Medium Risk: If a learner is at medium risk, you SHOULD make a prevent referral!

- legitimising the use of violence to defend ideology or cause
- accessing extremist or terrorist websites, forums and publications
- expressing dehumanising views
- expressing an interest to travel to a conflict zone
- being in contact with a group or individuals known to support a violent extremist ideology, either online or in real life
- expressing persistent intolerance towards groups of people perceived as 'other' - this may be based on protected characteristics such as gender, religion or ethnicity, but not exclusively
- demonstrating a fixation with weaponry or explosives (this may include posing in concerning photographs or videos with weaponry), without an otherwise reasonable explanation
- being obsessed with massacre, or extreme or mass violence, without targeting a particular group (for example, high school shootings)

High Risk: if showing signs of high-risk behaviour contact the police immediately!

- verbally or physically attacking someone due to their race, religion, sexuality and so on
- committing violent acts guided by a violent extremist ideology or group
- taking part in any proscribed violent extremist group (financing, sharing material online, recruiting others and so on)
- having a 'kill list' or detailed plan to carry out mass violence
- producing or sharing terrorist material offline or online

- recruiting others to a proscribed terrorist group or organisation.

More information regarding risk factors can be found via the GOV website- Risk Factors

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

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

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

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

Female Genital Mutilation (FGM) mandatory reporting

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

Risk factors for FGM include:

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

Symptoms of FGM

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

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.

- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

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

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

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

Breast Ironing

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

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

Further advice on forced marriage can be obtained from the Foreign and Commonwealth Office's Forced Marriage Unit Telephone (Office Hours: Mon–Fri, 09:00–17:00) 020 7008 0151,
Out-of-Hours / Emergency Contact- 020 7008 5000 and Email- fmu@fcdo.gov.uk

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

Modern Day Slavery and the National Referral Mechanism

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

Children who are referred into the NRM in England and Wales may also have access to an Independent Child Trafficking Guardian

Children Requiring Mental Health Support

Schools and Colleges play a key role in supporting the emotional health and well-being of pupils. In some cases, mental health can be an indicator of safeguarding concerns, these can include self-harm, signs of eating disorder, suicidal ideation or suicide which can indicate a child has suffered abuse, neglect or

exploitation and all provisions should have clear procedures on how to access the appropriate support for these children.

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

Further guidance in paragraph 226-232 KCSIE 2026.

Online Safety

As part of their duty to provide a safe learning environment and schools should ensure their pupils know how to remain safe online. There is considerable risk to children online, but they can be categorised within these four areas as stated within KCSIE 2026-page 44 part 162:

Content:

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

Contact:

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

Conduct:

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

Commerce:

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

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

Guidance to support schools and colleges to understand safety considerations and legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil-facing) can be found at Generative AI In Education
AI in Education support materials

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

Educating children and young people to stay safe online is crucial in the modern world. Other websites that can assist are:

Be internet legends
PSHE Association
ThinkUKnow
Safer Internet center

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

Please also refer to page 175 KCSIE 2026 for more online safety resources.

Mobile Phone policy

All schools should be mobile phone-free environments by default, with any exceptions permitted only where there is a clear and specific need. Statutory guidance on Mobile phones in schools makes clear that the Department for Education expects schools to have a policy in place whereby pupils do not have access to their mobile phones at any point during the school day. This includes lessons, the periods between lessons, break times and lunchtimes.

There are a range of approaches schools can adopt to achieve a mobile phone-free environment, and it is the responsibility of head teachers to determine the most appropriate approach for their individual school and context. Examples of how schools have successfully implemented mobile phone-free policies are available from Mobile Phones In Schools and Mobile free environment

Remote Education

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

Filtering and Monitoring

Paragraph 171 in KCSIE states ‘As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and ensure that a review of their effectiveness is carried out at least once every academic year. Reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the school’s designated safeguarding lead and IT support. They should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks’
The appropriateness of any filters and monitoring systems is a matter for individual schools and colleges and will be informed in part by the risk assessment required by the Prevent Duty.

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

The school or college will

- Designate and document specific roles and responsibilities for the implementation and oversight of filtering and monitoring systems.

- Conduct a formal review of filtering and monitoring provisions at least once every year to ensure ongoing effectiveness and relevance.

- Ensure harmful or inappropriate content is effectively blocked, while maintaining reasonable access to online resources necessary for teaching and learning.

- Implement robust and appropriate monitoring strategies that align with the organisation's safeguarding requirements.

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

Further guidance on filtering and monitoring can be found at:

- UK Safer Internet Centre - Appropriate Filtering and Monitoring

- South West Grid for Learning - has created a TOOL to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).

- The Department has published Generative AI: Generative AI Product Safety Expectations generative artificial intelligence safely and explains how filtering and monitoring requirements apply to the use of generative AI in education.

Reviewing online Safety

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

Paragraph 180 in KCSIE states: UKCIS has published Online safety in schools and colleges: Questions from the governing board. The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.

Cybercrime

Cybercrime refers to criminal activities carried out using computers and/or the internet. It is generally categorised into two types:

Cyber-enabled crimes – traditional crimes that can occur offline but are significantly amplified in scale or impact by digital technology.

Cyber-dependent crimes – offences that can only be committed using computer technology and networks.

Examples of cyber-dependent crimes include:

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

- Denial of Service (DoS) or Distributed Denial of Service (DDoS) attacks: Attempts to disrupt the normal functioning of a computer system, network, or website by overwhelming it with traffic from multiple sources.

- Creation, distribution, or use of malware: This includes malicious software such as viruses, spyware, ransomware, botnets, or Remote Access Trojans, often with the intent to commit further offences.

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

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

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Looked after Children, Previously Looked After Children and Care Leavers

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

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

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

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

Additional procedures
Individual schools should record any additional procedures here or refer to any separate policies
Schools and colleges should be aware of the new duty to promote the education of previously looked after children. These are defined as children who have left the care system as a result of adoption or special guardianship order. It is recognised that these children may face the same difficulties and have the same vulnerabilities as looked after children.
Schools and colleges should also consider the potential vulnerability of relevant children. These are children who under the Leaving Care Act are children who are aged 16-17 and who were but are no longer looked after.

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

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

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

In recent years, we have seen a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

It is not for schools and colleges to initiate any action in this area; this guidance is focused on circumstances where a child or their parent has raised a request relating to social transition to which a school or college is responding.

Schools and colleges should keep in mind that it is common for children to engage in activities that are less typically associated with their sex. For example, at primary school age, girls may play with trucks, or boys may dress in clothes that are perceived as feminine. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, While a small proportion may continue to question their gender, and this feeling may intensify into puberty.

Schools and colleges should take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. Schools and colleges should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

Schools and colleges should consider adopting policies across school and college life that maintain flexibility and avoid rigid rules based on gender stereotypes (KSCIE 2026 Paragraph 252-256)

Lesbian, Gay, Bisexual and transgender content July 2025 is part of Relationships Education and Relationships and Sex Education curriculum(for introduction 1st September 2026). There is a range of support available to help schools address homophobic, biphobia and transphobic bullying and abuse.

Children with Special Educational Needs, Disabilities and/or health issues

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

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

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Children with SEND and health issues can be disproportionally impacted by things like bullying without outwardly showing any signs.
- Communication barriers and difficulties in managing/reporting these challenges

- Potential risk of peer group isolation

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

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

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

Further information from Specialist Organisations:

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

Mencap- MENCAP

Private Fostering – LA Notification

Private fostering relates to children who are under the age of 16. Or under the age of 18 if it is a child with a disability. It is an arrangement where a child is cared for by an adult who is not a close relative. The arrangement must be made by the parents and must be in place for 28 days or more or be expected to be in place for 28 days or more.
Schools have a legal duty to notify Croydon of any pupils they know to be privately fostered. The DSL should make a MASH referral if any private fostering arrangements come to their notice to ensure the safety and suitability of the arrangement.
Notifications must contain information specified in schedule 1 of The Children private arrangements for fostering regulations 2005 this must be in writing.

Children staying with host families (homestay)

Schools and colleges may arrange short-term homestay accommodation for pupils, such as during foreign exchange visits or sports tours. Where a school or college arranges accommodation with an unrelated host family in the UK, the host adults are considered to be engaging in regulated activity for the duration of the stay.

Where the school or college can end the homestay arrangement, it is responsible for obtaining an enhanced DBS check with children's barred list information for the host adults. Schools and colleges may also choose to obtain enhanced DBS checks for anyone aged 16 or over living in the household.

Where the child's parent(s) or a student themselves arranges their own homestay, this would be a private arrangement therefore the school or college would not be the regulated activity provider.

Young Carers

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL should be aware of how to refer/contact housing to raise/escalate concerns as soon as possible (see Annex 5). Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being evicted from a property.
The Homelessness Reduction Act 2017 places a new legal duty on English councils everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live- homelessness Reduction bill policy factsheets

In some cases, 16- and 17-year-olds may be living independently or excluded from the family home and require different levels of support. Children's social care will lead, with the DSL ensuring appropriate referrals are made. Joint statutory guidance on accommodation for homeless 16- and 17-year-olds is above.

Temporary accommodation notification duty

The Children's Wellbeing and Schools Act places a new duty on local housing authorities in England to notify educational institutions, health visiting services and general medical practices, when a child is placed in temporary accommodation. This notification should be made when consent has been given from the parent, those with parental responsibility or care of the child, or the child themselves in cases of 16–17-year-olds living independently from their parents.

The notification will enable school and college staff to safeguard and promote welfare of these children at the earliest opportunity and support them to improve their outcomes.

Whilst any discussion with the local housing authority should be progressed as appropriate, this notification does not, and should not, replace existing safeguarding and welfare duties nor a referral into local authority children's social care where a child has been harmed or is at risk of harm.

Specific statutory guidance for local authorities on the temporary accommodation duty will be provided in due course KSCIE 2026 Pg 165

Children with family members in prison

Approximately 193,000 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.

School and college staff should be aware that children affected by parental imprisonment may be at increased risk of absence or exclusion, poor mental health, substance misuse and poorer educational and employment outcomes. Staff should provide sensitive, trauma-informed and tailored support to help reduce these risks and promote stability and wellbeing.

Children and the court system

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

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

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

The school will put in place a policy regarding handing over children to adults who are not their parent or known carer at the end of the school day. Parents will be asked to provide details of the person who will normally collect the child and will be informed of the need to notify the school in advance if this changes, giving details of the person authorised to collect the child. The school will also ensure that the details of at least two people who can be contacted in an emergency in the event that the child is uncollected. Parents will also be asked to inform schools where children are subject to court orders that limit contact with a named individual. If anyone who is not authorised to do so attempts to collect the child, the school will not allow the child to leave and contact the parent immediately.

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

- The schools will check with the child to see if there are any changes to arrangements for collection and try to contact the parents or other family members and wait with the child until someone comes to collect them.
- Children will not be released into the care of another parent even when they offer to take the child home.
- The school will contact the MASH line by 4.00pm if there are difficulties in contacting parents or other family members.
- If all possible means of contact have been exhausted and no contact can be made with the parents by 5pm, the school will contact the EDT team via phone and follow up with an email and if advised to do so the police, who will arrange to collect the child or make arrangements for the child to be transported to the children's social services office.
- The school will regularly ask parents to confirm and update contact details and to nominate a family member or friend who can collect the child if they are unable to do so.
- Where children are regularly uncollected or collected late, this should be discussed with the DSL If there are also child protection concerns, a referral should be made to children's social care via MASH.

Children who are absent from education

Prolonged or repeated absence from education can be an important indicator of safeguarding concerns, including neglect, child sexual exploitation, and child criminal exploitation—particularly in relation to county

lines. The school's approach to managing persistent absence and children missing from education is designed to support the early identification of such risks.

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

- The department's statutory guidance on school attendance Working together to improve school attendance .
- Information regarding schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.
- Further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges.
- General information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy.
- LA(Croydon) CME Policy- Croydon Children Missing From Education Policy

Elective Home Education (EHE)

While many children who are educated at home receive high-quality and positive learning experience, it is expected that the decision to home educate is made with the child's best educational interests at its core. However, this is not always the case. In some instances, elective home education can result in children becoming less visible to the professionals and services responsible for safeguarding and supporting them. This reduced visibility may increase the risk of unmet needs or safeguarding concerns going unnoticed. The school will work in partnership with local authorities and other agencies to ensure that any decisions around elective home education are carefully considered, and that the welfare of the child remains a central focus

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

Where a parent or carer expresses an intention to remove their child from school to pursue elective home education (EHE), it is recommended that the school, local authority, and relevant professionals work together to coordinate a meeting with the parents/carers wherever possible. Ideally, this meeting should take place before a final decision is made, to ensure that the implications have been fully considered and that the decision reflects the best interests of the child. This is particularly important in cases where the child is known to be vulnerable, has special educational needs and/or disabilities (SEND), or has an allocated social worker.

Schools should be familiar with the Elective Home Education guidance. While this guidance is primarily directed at local authorities, it outlines key responsibilities and powers in relation to EHE that are also relevant to schools when engaging with families considering this route.

Opportunities to teach Safeguarding

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

General safeguarding themes are addressed across the school's broad and balanced curriculum. However, more specific or sensitive issues relevant to our school community are taught through statutory Relationships Education (for all primary pupils), Relationships and Sex Education (for all secondary pupils), and Health Education (for all pupils in state-funded schools), which revised for introduction September 2026; colleges may cover relevant issues through tutorials.

Schools and colleges play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. The school/college will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life. (Paragraph 158 pg42)

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

Further information in paragraph 159-161

The Child's Wishes

The best interests of the child must remain central to all safeguarding decisions. The Governing Body and school or college leaders are responsible for ensuring that the child's wishes and feelings are actively considered when planning support and determining the appropriate course of action.

Other relevant safeguarding guidance

Schools can access additional guidance, policies and procedures at:
Education Toolkit
DfE Alternative Provision guidance
DfE School Attendance Parental Responsibility Measures guidance
DfE Behaviour in Schools guidance
DfE Preventing and Tackling Bullying guidance
DfE Children Missing Education guidance
DfE and ACPO Drug Advice for School guidance
DfE Advice for Schools on Equality Act 2010
DfE Supporting pupils at school with medical conditions
DfE Guidance on First Aid for Schools
DfE Mental health and behaviour in schools
DfE Use of reasonable force guidance
DfE Promoting fundamental British values as part of SMSC in Schools
DfE Children who run away or go missing from home or care
Child sexual exploitation – DfE guidance
Preventing youth violence and gang involvement
Safeguarding children who may have been trafficked
Criminal Exploitation of children and vulnerable adults: County Lines guidance
Preventing and tackling Bullying
Promoting children and young people's emotional health and wellbeing
Rise Above

Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, parents and carers *Domestic Abuse: Various information/Guidance* *Faith Based Abuse* *Homelessness: how local authorities should exercise their functions* *Private Fostering* *Upskirting: know your rights*

Part 2- Responsibility of Governors, Proprietors and Management

Legislation and the Law which Governing Bodies and proprietors adhere to can be found on pages 28-32 KCSIE 2026.

Croydon's Children Families & Education Directorate

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

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

Governing Board

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

- The school/college has the following policies in place, and these are regularly monitored, reviewed and updated where necessary.
- Safeguarding policies and procedures covering early help and child protection that are consistent with Croydon Safeguarding Children Board procedures and Croydon's internal policies.
- A staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media
- A procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- The school can work jointly with other agencies to ensure pupils can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.
- A member of staff is appointed as the Designated Manager to address allegations against school staff

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

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

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

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

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

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

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

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

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

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

- All staff receive safeguarding and child protection training every year and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation. Safeguarding training is available for all Croydon schools via the https://www.croydonsafeguarding.org/safeguarding-training

- The school/college has procedures in place to deal with allegations made against other pupils.

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

Schools- Head Teachers and Principals

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

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

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

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

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

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

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

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

- The school/college offers a safe environment for staff and pupils to learn.

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

PART 3 Safer recruitment

General Principles

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

The school and college educator will follow the *KCSIE 2026, paragraph 3* page 71

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

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

- Checks with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school. Types of DBS checks can be found on Page 76 KCSIE 2026.

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

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

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

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

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

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

- In colleges, the principal will be responsible for keeping a single central record of all staff that provides education to children.

- The single central records should include details of all checks carried out and the outcome of these checks or any certificates obtained.
- Multi-academy trusts can keep a 'master' single central record at their head office, but it must be accessible in each individual school.

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

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

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

Checks to be carried out

Further information about the different types of DBS checks and when they are required can be found within *KCSIE 2026 and on the DBS website- DBS website. DBS maintains barred lists of individuals who are unsuitable to work with children and vulnerable adults.

In the recruitment and selection of staff and volunteers, the school/college will adhere to the requirements set out in Working Together to Safeguard Children and Keeping Children Safe in Education 2026.

The school/college will verify and record the required pre-employment checks for all new staff on the Single Central Record, including:

- Verification of the applicant's identity using appropriate photographic identification and proof of address, in accordance with government guidance.
- The appropriate level of DBS checks for the role. Where the individual will be engaging in regulated activity with children, this will include an enhanced DBS check with children's barred list information.
- A prohibition from teaching check, where applicable.
- Appropriate checks for individuals who have lived or worked outside the UK.
- Verification of professional qualifications, where required.
- A check to establish the individual's right to work in the UK.

The school/college will ensure that DBS checks are appropriate to the individual's role and responsibilities and will comply with the requirements relating to employees, volunteers, contractors and other individuals working within the setting.

Schools/colleges should be aware of the following guidance:
Criminal records checks for overseas applicants - Publications - GOV.UK
Employing overseas-trained teachers from outside the EEA - Publications - GOV.UK
Disqualification by Association
DBS and Filtering

In addition:

- colleges **must** record whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18, and

- independent schools (including academies and free schools) **must** record details of the section 128 checks undertaken for those in management positions.

Retention of Documents

The school/college will keep copies of the following documents in staff personnel files per advice in paragraph 311:

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

Agency and third-party Staff

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

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

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

Volunteers

The Crime and Policing Act 2026 made changes to regulated activity, meaning that any person volunteering in a school or college in a role that involves teaching, training, instructing or supervising children frequently or on more than 3 days in a 30-day period or overnight is now regulated activity (see paragraph 315 for more information on regulated activity). Where this applies, schools or colleges should obtain an enhanced DBS check with children's barred list information.

The school/college will ensure that appropriate safeguarding and recruitment checks are undertaken for all volunteers, proportionate to their role and responsibilities.

- Volunteers will undergo an appropriate recruitment process, which may include references, DBS checks and other relevant checks, depending on the nature and frequency of their role.
- From 1 September 2026, following the removal of the supervision exemption under the Crime and Policing Act 2026, volunteers who undertake regulated activity with children will require an enhanced DBS check with children's barred list information. This applies whether or not the volunteer is supervised.

- Volunteers undertaking teaching, training, instruction, care or supervision of children will be considered to be engaging in regulated activity where the relevant frequency or overnight conditions are met.
- Volunteers who assist only occasionally, such as parents accompanying pupils on an occasional day trip, will not normally be engaging in regulated activity and will not require an enhanced DBS check with children's barred list information. The school/college may, however, request an appropriate DBS check where this is considered necessary.
- For volunteers who are not engaging in regulated activity, the school/college will undertake a risk assessment to determine whether a DBS check is appropriate. This will take into account the nature and frequency of the role, the level of contact with children, information known about the volunteer, references and whether the role is eligible for a DBS check.
- The school/college will ensure that volunteers are appropriately inducted, understand relevant safeguarding policies and procedures, and are only given duties appropriate to their skills, experience and role.
- Volunteers who are required to undertake regulated activity will not be permitted to do so until the appropriate safeguarding checks have been completed, unless an alternative lawful arrangement applies.
- The school/college will ensure that appropriate supervision and safeguarding arrangements remain in place for all volunteers, regardless of whether they are engaging in regulated activity.

Trainee / Student Teachers

Where applicants for initial teacher training are salaried by the school or college, the school or college must ensure that all necessary checks are carried out. If these trainee teachers are engaging in regulated activities relating to children (which in most cases by the nature of the work, they will be), an enhanced DBS check (including children's barred list information) must be obtained (paragraph 372-374 pg 93)

There is no requirement for the school or college to record details of fee funded trainees on the single central record. However, schools and colleges may wish to record this information under non statutory information.

References

- Applicants will be required to provide a full employment history, including education, employment and voluntary work, with reasons for any gaps in employment.

- References should be obtained before interview, where possible, to allow any concerns to be explored with the referee and candidate. References should be requested directly from the referee and not obtained by the applicant.

- References should be provided by the candidate's current employer and completed by a senior person with appropriate authority. Open references, such as 'to whom it may concern', will not be accepted.

- Where the applicant is not currently employed, verification of their most recent relevant period of employment should be obtained. Where the applicant is no longer working with children, a reference should be obtained from the employer where they last worked with children.

- All references will be scrutinised, and any concerns or discrepancies will be followed up with the referee and/or candidate before an appointment is confirmed.

- The school/college will verify information provided in references directly with the referee and ensure that electronic references originate from a legitimate source.
- Information provided in the application form will be compared with the information contained within references, and any discrepancies will be explored with the candidate.

- The reason for the applicant leaving their current or most recent post will be established.

- References should confirm whether the employer is satisfied with the applicant's suitability to work with children. Where relevant, references should provide factual information about substantiated safeguarding concerns or allegations that meet the harm threshold. References should not include concerns or allegations that are unsubstantiated, unfounded, false or malicious.

- Any concerns arising from the application, employment history or references will be satisfactorily resolved before the appointment is confirmed.

DBS Checks and Update Service

The school/college will undertake the appropriate DBS checks as part of its safer recruitment procedures, in accordance with *Keeping Children Safe in Education (2026)*.

- Individuals engaging in regulated activity with children will require an enhanced DBS check with children's barred list information.
- Where a DBS check identifies relevant information, the school/college will assess the individual's suitability, taking account of the nature and seriousness of the information, when it occurred and the circumstances.
- Where eligible, individuals may join the **DBS Update Service**. With the individual's consent, the school/college may undertake an online status check to confirm that the existing certificate remains suitable for the role, provided the required conditions are met.
- DBS checks will not routinely be renewed every three years. The school/college will determine when a new check is required based on the role, circumstances and relevant DBS requirements.

Alternative Provision

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should therefore be satisfied that the placement meets the pupils' needs paragraph 208.

Where a school commissions services from an alternative provision provider, it must obtain written confirmation that the provider has carried out all necessary safeguarding checks on individuals working with pupil's equivalent to those the school would complete for its own staff.

The alternative provider must also confirm in writing that they will notify the commissioning school of any changes that may affect pupil safety, such as staffing changes or new appointments, to allow the school to ensure that appropriate safeguarding checks have been completed on any new personnel.

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

- The pupils attend regularly

- The placement remains safe

- The provision continues to meet the pupils' needs

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

The DFE has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have- Alternative Provision and Education for children with health needs who cannot attend school

PART 4 Safeguarding Concerns and Allegations Against a Member of Staff

Conduct and safe teaching practice

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

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

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

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

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

If an allegation is made against a member of staff or volunteer, the school/college will follow Croydon's procedures for managing allegations against a member of staff Croydon LADO Guidance

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

Allegations that meet the harms threshold

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

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

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

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

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

Following consultation, the head teacher/principal, in agreement with the LADO will decide on appropriate action and consider:

- Further Inquiries
- Immediate referral to the Police
- Consideration of disciplinary proceedings
- Consideration of a senior strategy meeting

The designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance. *Investigating and supporting the person subject to the allegation* - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

It is important to bear in mind that although the concern may relate to an individual pupil/student, other pupil/students may also be at risk. The school/college will follow the procedures set out in Keeping Children Safe in Education (2026) and Working Together to Safeguard Children, including consultation with the Local Authority Designated Officer (LADO) where the relevant threshold is met.

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

All procedures set out in Part 4 of KCSIE 2026 will be adhered to alongside previously mentioned documents and used as guidance when managing allegations of any kind.

Where a teacher is dismissed, or their services are ceased, because of serious misconduct, or would have been dismissed had they not resigned, the school/college will consider whether a referral to the Teaching Regulation Agency (TRA), on behalf of the Secretary of State, is required. Reporting teacher misconduct

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

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO (paragraph 506 pg119 KCSIE 2026)

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.

Examples of low-level concerns:

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

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

Allegations Against Staff and Volunteers, supply staff and contractors

The school/college shares responsibility with agencies and other third-party organisations for managing safeguarding concerns or allegations involving supply teachers, trainee teachers and contracted staff.

Where an allegation is made, the school/college will take the lead in establishing the facts and managing the safeguarding process, working with the relevant agency or organisation and the LADO, police or children's social care where appropriate.

Agencies and third-party organisations are expected to cooperate fully with safeguarding enquiries and provide relevant information, including any previous concerns or allegations. The school/college will ensure that appropriate safeguarding procedures are followed and that information is shared with the relevant organisation where necessary.

Where concerns relate to a trainee teacher, the school/college and training provider will work together to ensure the concern is appropriately managed, with the LADO consulted where the threshold is met.

Organisations or Individuals using school premises

If a school or college receives an allegation concerning an incident that occurred while an external individual or organisation was using the premises to run activities for children (such as community groups, sports clubs, or external service providers), the school or college must follow its safeguarding policies and procedures, including notifying the LADO.

Whistleblowing

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

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

- Croydon's lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil.
- The following numbers can be used where there are issues regarding the school/college's overall procedures around safeguarding:

    - Croydon Council's confidential whistle blowing email address – SchoolWhistleBlowing@croydon.gov.uk
    - The Ofsted whistle-blowing line on **0300 123 3155/** whistleblowing@ofsted.gov.uk
    - Whistleblowing for employees
    - The NSPCC whistleblowing advice line is an alternative route if staff feel they cannot raise concerns internally on **0800 028 0285** is open from 8 am – 8pm Monday –Friday or email help@nspcc.org.uk
    - The CSCP has an Escalation and resolution Policy which can be used by staff in school settings.

The head teacher/principal is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and pupils.

Additional policies *Individual schools should record any additional procedures here or refer to any separate policies, which should cover the following areas:*
• *Relationships with pupils/positions of power and trust for the purposes of the Sexual Offences Act 2003* Referenced in the **Staff Code of Conduct** and the **Low-Level Concerns Policy** • *expected guidance on professional and personal standards of conduct and behaviour* Detailed in the **Staff Code of Conduct** and **Whistleblowing Policy**

- *confidentiality* Managed under the **Data Protection Policy** (GDPR) Policy and the **Information Security Policy**
- *duty of care* Overarched by this **Child Protection and Safeguarding Policy** alongside the **Health and Safety Policy**
- *contact and communications with pupils and parents, including appropriate physical contact, home visits, email and other electronic communications* Outlined in the **Acceptable Use Policy (AUP)**, **Social Media Policy**, and the **Home-School Agreement**. Operational protocols for physical interventions are detailed in the **Beulah Junior School Behaviour Policy**
- *behaviour management and use of restraint* Managed through the **Beulah Junior School Behaviour Policy**
- *dealing with allegations* Detailed in the **Managing Allegations Against Staff Policy** (in alignment with the LADO procedures)
- *first aid and administering medicines* Outlined in the **First Aid Policy** and the **Supporting Pupils with Medical Conditions Policy**
- *providing intimate or personal care* Governed by the **Intimate Care Policy**
- *photography and videos* Managed in the **Social Media Policy**

Providing Intimate or Personal Care to Pupils

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

- Staff should follow any agreed school policy or practice when providing intimate or personal care.
- When taking pupils to the toilet, staff should make colleagues aware of the task to be undertaken and explain to the child what will happen.
- Parents should always be notified if intimate care has been provided.
- When providing intimate care, staff should carefully and sensitively observe the child's emotional response and report any concerns to the designated teacher.
- When children are changing, levels of supervision should be appropriate to the pupil's age.
- Staff should avoid any physical contact unless a child needs help.
- Staff should ensure that changing areas are private and that others are not able to enter whilst children are changing.

Boarding Schools, residential special schools, residential colleges and children's homes

Schools with boarding or residential provision must recognise the additional safeguarding risks associated with children living away from home. They must comply with the relevant National Minimum Standards and regulations and ensure effective safeguarding arrangements across both educational and residential settings. The DSL should work closely with the relevant local and placing authorities, residential staff, parents/carers and other agencies to ensure concerns are identified, shared and responded to appropriately.

Behaviour management, physical intervention and reasonable force

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

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

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

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

All incidents involving the use of reasonable force must be clearly recorded in a suitable format, monitored in line with safeguarding and behaviour protocols. *Guidance from the Department of Education provides schools with the power to intervene in a variety of ways to manage behaviour within and outside the school. Details of these may be found at: Restrictive Interventions including use of reasonable force*

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

PART 5 Health and safety- Risk assessments

Responsibility for health and safety

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

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

Health and Safety Advice for Schools-responsibilities and duties for schools

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

Risk assessments

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

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

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

Working with aggressive and violent parents

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

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

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

Site security and visitors

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

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

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

- Local Authority staff visiting schools in a professional capacity, including social workers, education staff and directors/head of service, will be covered by a letter of assurance confirming that the appropriate pre-employment and DBS checks have been completed.

  - Schools/colleges should verify the visitor's identity and be assured that the appropriate checks have been undertaken. They should not request to see the individual's DBS certificate where the Local Authority has provided written assurance of the relevant checks.

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

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

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

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

Use of the school premises by other organisations

Where school/college premises are used by external organisations outside normal school hours, the school/college will ensure that appropriate safeguarding arrangements are in place.

The school/college will seek assurance that external providers have appropriate safeguarding and child protection policies and procedures, including appropriate safer recruitment and DBS arrangements, and will undertake reasonable due diligence on the organisation.

Where appropriate, safeguarding requirements and arrangements for liaison with the school/college will be included in any agreement with the provider.

Out of school settings-safeguarding guidance for providers

Monitoring and Review

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

- All school/college policies are regularly monitored by the DSL and annually reviewed by the head teacher and agreed by the governing board.

- The school/college keeps a central record of all accidents and incidents including what action was taken and by whom.

- Staff are aware of their responsibility to record accidents and incidents.

- The head teacher/principal has an overview of all accidents/incidents.
- Serious accidents and incidents are reported to the Governing Board.
- The DSL ensures a high standard of recording of all concerns about children.
- All accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around school/college safeguarding policies and procedures or any emerging patterns and agreeing to any course of action.

Annex 1:

Role of the designated safeguarding lead

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

The designated safeguarding lead (and their deputy) will:

- Liaise with and manage referrals to relevant agencies such as Children's Social Care, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS).
- keep the head teacher/principal informed of on-going safeguarding and child protection issues and enquiries, especially section 47 enquiries.
- Provide advice and guidance for staff on safeguarding and child protection issues and manage referrals. This includes where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.
- Ensure the school's safeguarding and child protection policies are up to date and consistent with Croydon's Safeguarding Children Board policies and that policies are reviewed annually.
- Ensure all staff, including temporary staff, are aware of and understand policies and procedures and can implement them. These include KCSIE Part 1, the school's Code of Conduct, the School Safeguarding Policy including the Annex to this policy for their school and the Behaviour Policy. They will be a point of contact for advice and support for staff as well as safeguarding partners.
- Attend regular training, including Prevent awareness training, and the designated teachers meetings hosted by Croydon and the Safeguarding Children Board in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices.
- Work with the head teacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues

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

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

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

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

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

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

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

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

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

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

FULL Details of the role of the designated safeguarding lead and deputy can be found in annex B of KCSIE 2026. It is important that the DSL and DDSL are fully aware of their role and have the capacity to carry out all areas of this.

Annex 2

Child Protection-Definitions and Indicators

Definitions

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

Neglect: persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of the child's health or development. This may include failing to provide adequate food, clothing, shelter, supervision, medical care, or emotional support.

Physical abuse: deliberate causing physical harm to a child.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, whether the child is aware of what is happening. It includes contact and non-contact activities, such as involving children in looking at sexual images, grooming, or encouraging inappropriate sexual behaviour.

Emotional abuse: persistent emotional maltreatment of a child that has severe and lasting effects on their emotional development. It may involve making a child feel worthless, unloved, inadequate, frightened, exploited, or exposing them to the ill-treatment of others.

Possible indicators of abuse and neglect

Neglect	• Inadequate or inappropriate clothing • Appears underweight and unwell and seems constantly hungry • Failure to thrive physically and appears tired and listless • Dirty or unhygienic appearance • Frequent unexplained absences from school • Lack of parental supervision
Physical abuse	• Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury • Injuries in unexpected places or that are not typical of normal childhood injuries or accidents • High frequency of injuries • Parents seem unconcerned or fail to seek adequate medical treatment
Sexual abuse	• Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development • Sexual risk-taking behaviour including involvement in sexual exploitation/older boyfriend • Continual, inappropriate or excessive masturbation • Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy • Unwillingness to undress for sports
Emotional abuse	• Developmental delay • Attachment difficulties with parents and others • Withdrawal and low self-esteem

Indirect indicators of abuse and neglect	• Sudden changes in behaviour • Withdrawal and low self-esteem • Eating disorders • Aggressive behaviour towards others • Sudden unexplained absences from school • Drug/alcohol misuse • Running away/going missing • Absence from school
Parental attributes	• Misusing drugs and/or alcohol • Physical/mental health or learning difficulties • Domestic violence • Avoiding contact with school and other professionals

Annex 3:

Useful links and information

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

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

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

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

DfE advice for schools: teaching online safety in schools

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

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

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

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

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

Boarding schools: minimum standards
Residential special schools: minimum standards
Further education residential accommodation: minimum standards

Annex 4:
KCSIE 2026-Summary of changes for policy updates

KCSIE 2026 page	Section / paragraph	Key change
189	Throughout	New terminology around **"nudes and semi-nudes"**; previous terminology such as "sexting" and "youth-produced sexual imagery" removed.
189	Part 1, para 13	Early Help terminology updated to distinguish **community-based Early Help** and **targeted Early Help through Family Help**.
189	Part 1, para 17	Expanded examples of children who may require additional support, including **parental offending/custody**.
189	Part 1, paras 18–29	Expanded content on **modern slavery, extra-familial harm, child-to-parent abuse, emotional/sexual abuse and overlapping safeguarding concerns**.
189–190	Part 1	**Mental health and serious violence** sections substantially updated.
190	Part 1, para 58	Additional guidance on managing support for children internally.
190	Part 1, paras 62, 66	Changes to assessment arrangements and expectations around **local assessment protocols**.
190	Part 1, paras 75–77	**Trainee teachers** added, including consideration of LADO referral.
190	Part 2	**Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025** updated.
190	Part 2, paras 95–98	New section on **Sport** and safeguarding.
190	Part 2, paras 105–116	New section on **regulations and safeguarding requirements relating to school premises**.
190	Part 2, para 127	Stronger expectations for **DSL cover arrangements** when the DSL is unavailable.
190	Part 2, paras 138–150	Information-sharing guidance expanded, including **risk assessment**.
191	Part 2, paras 163, 165–166	Online safety definitions updated and new guidance on **generative AI in education**.
191	Part 2, para 168	**New mobile phone policy section**.

191	Part 2, para 171	Filtering and monitoring effectiveness reviews strengthened.
191	Part 2, paras 176–178	Information security section redrafted.
191	Part 2, paras 186–189	**Trainee teachers** added.
191	Part 2, para 191	Updated list of matters that should be included in the child protection policy, including **misandry**.
191	Part 2, paras 197–202	New section on **boarding and residential accommodation**.
191	Part 2, paras 203–205	**Reasonable force** updated to reflect new restrictive intervention guidance.
191	Part 2, paras 208–213	**Alternative Provision** section updated.
191	Part 2, paras 224–232	Children requiring **mental health support** section updated.
191	Part 2, para 242	Greater emphasis on the role of **Virtual School Heads in improving attendance**.
191	Part 2, para 246	New section on **young carers**.
191	Part 2, paras 247–249	Additional barriers faced by children with **SEND**.
191	Part 2, para 250	New section on **safeguarding children with medical conditions**.
191	Part 2, paras 252–282	Significant update to guidance concerning **LGB and gender-questioning children**.
191	Part 3, para 315	**Regulated activity rewritten**, including volunteers. Supervision exemption removed.
191	Part 3	"DBS check types" section removed and DBS flowchart removed.
191	Part 3, para 325	New requirement regarding **DBS checks for volunteers in regulated activity**.
191	Part 3, para 326	DBS timing clarified – certificate information can be provided **within 30 calendar days of issue**.
192	Part 3, para 370	Clarification of DBS eligibility for **self-employed people**.
192	Part 3, para 375	Categories of **visitors to schools** clarified.
192	Part 3, paras 381–387	Volunteer section rewritten following removal of supervision exemption.
192	Part 3, paras 403–407	**Work experience supervision** section rewritten.
192	Part 3, paras 408–410	**Homestay arrangements** moved into the main guidance.
192	Part 3, para 422	Existing staff section updated to include **volunteers**.
192	Part 3, paras 424–428	**Duty to refer to DBS** rewritten to include volunteers.

192	Part 3, para 429	Reference added to schools' duties under the **Public Sector Equality Duty (PSED)**.
192	Part 4, paras 452–456	Supply teacher/contracted staff section updated to clarify **shared safeguarding responsibilities with third parties**.
192	Part 4, paras 452–456	New expectations for **trainee teacher allegations**.
193	Part 5	Part 5 substantially rewritten around the **continuum from harmful sexual behaviour to sexual violence**.
193	Part 5, para 527	**All incidents involving sharing nudes/semi-nudes require a safeguarding response**, whether consensual or non-consensual.
193	Part 5, paras 540, 575–592	Further information on **consent**, Early Help and **Family Help referrals**.
193	Annex A	Former Annex B moved to Annex A. **Annex A (old condensed Part 1) removed.**
193	Annex A	Cybercrime, domestic abuse, Operation Encompass and serious violence content updated.
193	Annex A	New section on **Temporary Accommodation Notification Duty**.
194	Annex B	DSL role updated, including **cover arrangements when DSL unavailable**.
194	Annex B	Additional information on information sharing, CCE/CSE indicators and Operation Encompass.
194–195	Annex C	Former Annex E on regulated activity updated/removed following changes to supervision exemption.
195	Annex C	Volunteers undertaking teaching, training, instructing or supervising children **more than 3 days in a 30-day period or overnight** are now in regulated activity.

Annex 5

Beulah Junior School Child-on-Child Abuse Operational Annex

1. Purpose and Status

This annex details the **localized, day-to-day operational workflow** for all staff at **Beulah Junior School**. It serves as the definitive bridge between the overarching **Croydon Model Safeguarding Policy** and the school's **Behaviour Policy**.

Staff must maintain a vigilant **"it could happen here"** attitude. Every report of peer-on-peer harm must be treated with a trauma-informed safeguarding response rather than standard school discipline.

2. The Operational Boundary: Safeguarding vs. Behavior

Staff must understand when to apply standard behavioral interventions and when an incident must instantly bypass the classroom chart.

LOW-LEVEL BEHAVIOUR ROUTE
Examples: Calling out, disrupting learning, rough play, off-task. Action: Manage via visible classroom Behaviour Chart / Reflections.
↓
SERIOUS CHILD-ON-CHILD ABUSE ROUTE
Examples: Sexual harassment, nudes/semi-nudes, weapons, group bullying. Action: BYPASS CLASSROOM CHART IMMEDIATELY. Trigger 4-Step Pathway.

- **The Behaviour Route:** Low-level, non-abusive playground conflict or classroom disruption is managed systematically through the visible **Behaviour Chart** (reminders, losing playtime minutes, and SLT-supervised Lunchtime Reflection).

- **The Safeguarding Route:** Any incident matching the statutory definitions of child-on-child abuse **must never be displayed on the visible classroom red triangle**. Staff must never minimize these behaviours as "banter," "boys will be boys," or "just a phase".

3. Immediate Staff Action Protocol (The 4-Step Pathway)

If a pupil makes a direct disclosure, if you overhear a conversation, or if you witness an incident of child-on-child abuse, you must follow these four sequential steps before leaving the school site on the same day:

Step 1: Secure and Separate

Physically separate the children involved immediately. Ensure both the victim and the alleged perpetrator are safely supervised by adults in **entirely separate rooms** to prevent further intimidation, collusion, or distress.

Step 2: Listen and Reassure

- **Do:** Remain completely calm, listen carefully, and take the child seriously. Reassure them that they did the right thing by speaking out.
- **Don't:** Express shock or disbelief. Do not ask leading, probing, or investigative questions. **Never promise absolute confidentiality**; explain that you must share this with the safeguarding team to keep them safe.

Step 3: Immediate Verbal Alert

Walk directly to the safeguarding office and verbally inform the **Designated Safeguarding Lead (DSL)** or a Deputy DSL without delay. Interrupt a lesson or meeting if necessary. If an active danger exists or a weapon is present on-site, alert a member of the **Senior Leadership Team (SLT)** instantly.

Step 4: Mandatory CPOMS Entry

Log a detailed, chronological record of the disclosure on **CPOMS** within 24 hours.

- Select the explicit category: **"Safeguarding: Child-on-Child Abuse"**. Do not use standard behavioural or bullying tags.
- Record objective facts, quote the child's exact words where possible, and do not express personal opinions. Hand any original paper notes or body maps directly to the DSL.

4. Post-Incident Management & Site Safety Controls

Once the case is referred, the DSL and SLT will assume full case management and immediately implement environmental and layout protections to safeguard the victim and wider school community:

- **Physical Layout Adaptations:** The school will evaluate and alter pupil movements. This includes enacting temporary classroom or year-group zoning, enforcing distinct playground bubbles, staggering lunchtime and break transitions, and deploying dedicated staff for targeted corridor and toilet monitoring.
- **Digital Protections:** If the abuse involves the creation, sharing, or threatening of intimate media (nudes/semi-nudes, including AI-manipulated images), the school IT administrator will immediately apply filtering restrictions on school networks. Devices will be managed under the strict boundaries of the DfE *Searching, Screening, and Confiscation* guidance. **Staff must never view, screenshot, or forward an illegal image of a child**.
- **Parallel Multi-Agency Referrals:** The DSL team will assess the risk against local thresholds. If there is reasonable cause to suspect significant harm or a criminal offense, a formal referral will be made to **Croydon MASH** via the online portal within 24 hours or directly to the police via 101/999.
- **Targeted Care and Sanctions:** The victim will automatically be fast-tracked to the **School Counsellor** for trauma-informed support. A separate staff member will be assigned to mentor the alleged perpetrator to address their behaviour. Standard behavioural sanctions, such as suspensions or permanent exclusions, will be executed by the Head Teacher only after the initial safeguarding risk assessments are secure.

Annex 6

Safeguarding children monitoring/incident form

NB: Only used when the online system (CPOMs) is not working

This form is to be used to keep a record of any incidents witnessed or conversations with children or parents that are of concern or to record any safeguarding incident.
You must only record facts – exactly what was said/ seen and not your opinion. Immediately give the completed form to Bernice Warwick, Rosie Ofosuhene or Clair Budd. If physical injury is seen please complete a body map. Body maps are available in the staffroom.
This could be shown to parents if requested

Child's Full Name:		
Day of the week:	**Date:**	**Time of concern:**
Your account of the concern: (what was said, observed, reported and by whom)		
Your response: (what did you do/say following the concern)		
Body Map attached? If so which number body map was completed: 1 2 3 N/A *Please circle all appropriate.*		
Form passed to:		
Your full name:	**Your signature:**	
Your position in school:	**Date and time of this recording:**	

This page is to be completed by the Safeguarding Lead/ Head Teacher:

Action, response or parent/carer discussion		
Decision **Referral made?** **Yes / No**	**If not why?**	**If yes who to and when?**
Name:		**Date:**

Checklist for Safeguarding Lead

☐ CPOMS unavailable
☐ Report received in a timely manner
☐ Child clearly identified
☐ Name, designation and signature of the person completing the record
☐ Date and time of any incidents or when a concern was observed
☐ Date and time of written record
☐ Report distinguish between fact, opinion and hearsay
☐ Concern described in sufficient detail, i.e. no further clarification necessary

☐ Child's own words used. Swear words, insults or intimate vocabulary should be verbatim.
☐ Written in a professional manner without stereotyping or discrimination?
☐ The record includes an attached completed body map to show any visible injuries