



**FAIRCHILDES
ACADEMY
COMMUNITY
TRUST**

Safeguarding and Child Protection Policy

REVISED September 2024

Revised September 2025

Revised September 2026

This policy should be read in conjunction with the following FACT policies: behaviour, equal opportunities, staff code of conduct, anti-bullying, Inclusion, admission, attendance, ICT and health and safety policies.

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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	
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Safeguarding Policy Statement

Fairchildes Academy Community Trust (FACT) fully recognises its responsibilities for Safeguarding and Child Protection. The health, safety and well-being of all our children are of paramount importance to all the adults who work in our school. Our children have the right to protection, regardless of age, gender, race, culture or disability. They have a right to be safe in our school. Our policy applies to all staff, governors and volunteers working within the trust.

There are **five** main elements to our policy:

- Ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with children.
- Raising awareness of safeguarding, child protection issues and promoting the welfare of children, equipping children with the skills needed to keep them safe.
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- Supporting pupils who have been abused in accordance with his/her agreed child protection plan.
- Establishing a safe environment in which children can learn and develop.

We recognise that because of the day to day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Ensure children know that there are adults in the school whom they can approach if they are worried.
- Include opportunities in the PSHE and citizenship curriculum for children to develop the skills they need to recognise when they are at risk and how to get help when they need it.
- Work in partnership with children, young people, their parents or carers and other agencies to promote our young people's welfare.
- Ensure **all** staff and visitors are wearing visible identity badges when on site
- Ensure **all** staff challenge any adult on site if an identity badge is not visible
- Expect **all** staff to be extra vigilant when working with children with disabilities or learning needs and families where there is mental health / substance misuse or a history of domestic violence. Also where there has been previous child abuse in the family.
- Expect **all** staff to record any safeguarding concerns on CPOMS (Child Protection Online Management System)

Purpose of Policy

To provide protection for all children within the trust

To provide **all** staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child may be experiencing, or be at risk of harm

This policy applies to all staff, including senior managers, governors, paid staff, volunteers and sessional workers, agency staff, students or anyone acting on behalf of the trust.

All staff should be aware that all relationships and associations that they may have in and outside of school (including online), may have an implication for the safeguarding of children in school. Where this is the case, the member of staff must speak to the school DSL.

This policy follows the statutory government guidance Keeping Children Safe in Education: 2026; Working Together to Safeguard Children 2018; the London Child Protection Procedures: 2010 and What to do if you're worried a child is being abused: 2006.

Procedures

The designated and deputy designated safeguarding leads will complete child protection training every two years.

The role of the designated child protection person is to:

- Know about the signs and symptoms of abuse and know how abusers behave.
- Ensure the organisation's child protection policy and procedures are followed and updated.
- Ensure information is shared appropriately.
- Receive and record information via CPOMS from anyone who has concerns and take appropriate action.
- Assess the information promptly and carefully, clarifying or obtaining more information when they need to.
- Consult with a statutory child protection agency; such as the Croydon Social Care Contact Centre, Early Intervention Team or NSPCC, to talk about any doubts or uncertainty and seek advice.
- Make a formal referral to a statutory child protection agency or police.

If you suspect child abuse

DO refer to the Designated or Deputy Safeguarding Lead immediately. DO write up a full report for the Designated or Deputy Safeguarding Lead, using CPOMS	DO NOT examine the child DO NOT ask leading questions DO NOT discuss with anyone other than the Designated or Deputy Safeguarding Lead
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Allegations of abuse by another child or young person must be given the same importance as any other form of alleged abuse and referred to the Designated or Deputy Safeguarding Lead.

If a child discloses information to you it is essential to safeguard and not contaminate the evidence in the event of the possible subsequent prosecution of the perpetrator. The following guidelines will help you to avoid this:-

DO allow the child to do the talking DO listen to, rather than directly question, the child DO listen quietly and encouragingly DO remain calm and caring DO allow the child to finish DO explain that you may have to tell someone DO record the conversation as soon as possible afterwards. Use the child's own words where possible. DO refer to Designated or Deputy Safeguarding Lead DO write up a full report for the Designated or Deputy Safeguarding Lead	DO NOT postpone or delay the opportunity to listen DO NOT stop a child who is freely recalling significant events DO NOT ask leading questions DO NOT allow your feelings, such as anger, pity or shock to surface DO NOT make promises of secrecy DO NOT interpret what you have been told, just report it DO NOT discuss with anyone other than the Designated or Deputy Safeguarding Lead
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NB: 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. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL). It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication. (KCSIE Sept 2022)

Recording

- 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.

When staff record:

Distinguish between fact and opinion

Try to describe what happened fully but succinctly

Use the exact words and phrases that the child used

Use the body map if required with a full description

Only record what is visible or what the child volunteers to show you.

Do not ask the child to remove clothing or show you their injuries.

Information sharing (Child)

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.

Referrals

Please note matters of child protection should always be considered as urgent.

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

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

- 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.

Disagreements About The Need For Referral

All members of staff have a duty of care to report child protection concerns. If staff and managers disagree about the need for a referral, they should seek advice. If the matter cannot be resolved, members of staff can make a referral in their capacity as a citizen.

Making a Referral

Members of the Children's Workforce have a duty to act on child welfare concerns and their anonymity cannot be preserved. Referrals must be completed online using the online MASH form, which can be accessed via <https://www.croydon.gov.uk/children-youngpeople-and-families/child-protection-and-safeguarding/report-concern-about-child> clicking on the link: Concerned about a Croydon child.

Urgent CP Advice: 0208 2552888

- **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](#)

What to do if you're worried a child is being abused 2015

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

The London Safeguarding Children Board child protection procedures

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

Keeping children safe in education 2025

- [Keeping Children Safe in Education](#)

Croydon Safeguarding Board local policies and procedures

- www.croydonsafeguarding.org

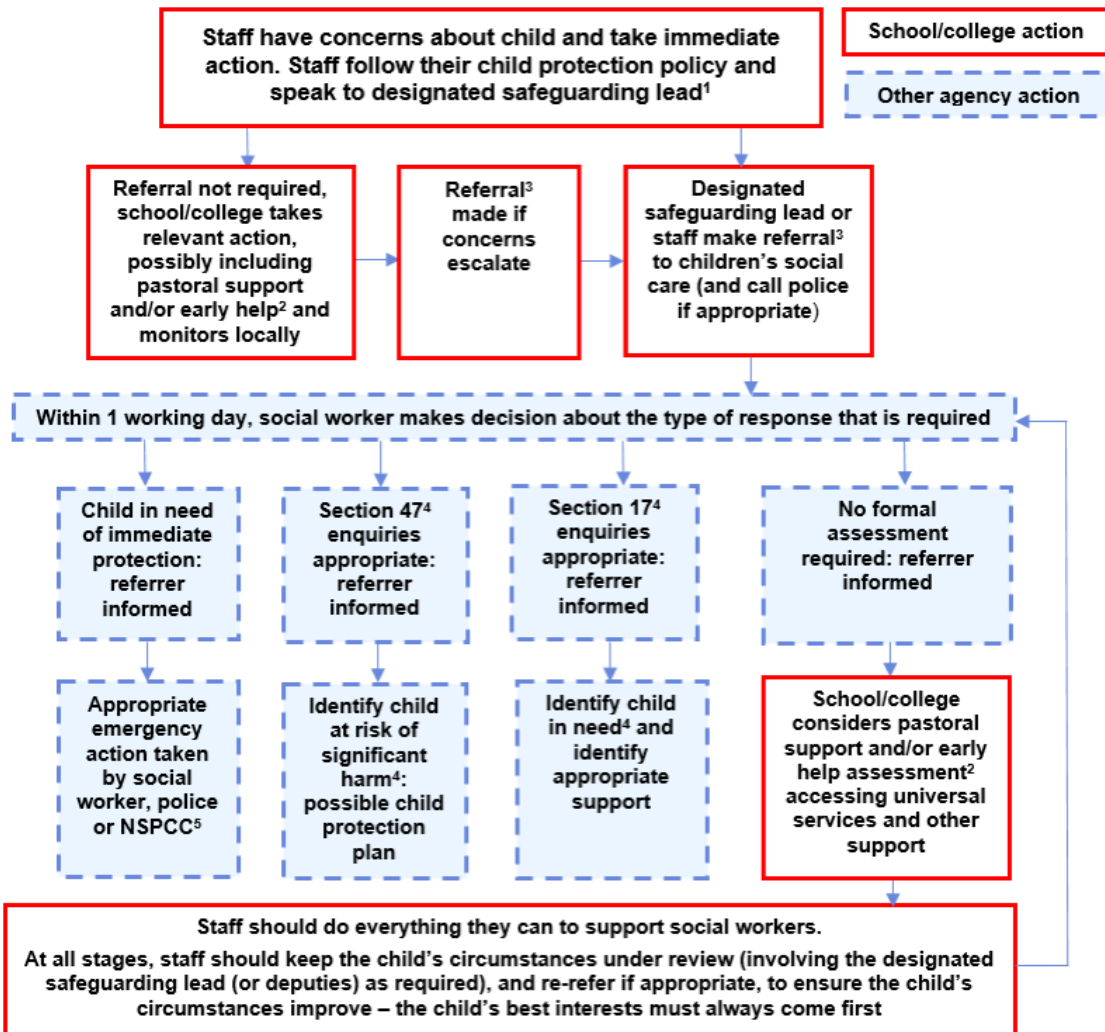
Timescales

Referrals following specific incidents should be made within 24 hours. Where concern has built over a period of time, referral may be delayed. Normally the DSL (or person reporting) will ask the parents for their explanation of your concerns and tell them you are going to make a referral to Children's Social Care. However, the DSL (or person reporting) will not talk to the parents about concerns where it would

jeopardise the child's safety, for example:

- There are concerns about sexual abuse
- The child appears very frightened of their parents and fears reprisals

DSL (or person reporting) will give as much information as possible Including: School details, Children's names, Date and time of referral, Family details and Summary of concerns



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.

What You Think Should Happen Emergencies

If you believe there is an immediate need for a safeguarding response phone Croydon Council's contact centre on 0208 8726 6400 (This is the same number out of hours). If you believe a child is in immediate physical danger, you should call the Police on 999.

Dissatisfaction With The Response To Referral

If you are dissatisfied with the outcome of your referral and particularly if you are concerned that a child may be left at risk, you must ask to talk to one of the managers in the service. If you continue to be concerned, you may ultimately need to speak with the Service Manager or Service Lead.

Definitions of Abuse

All staff must therefore be alert to any possible indicators that a child is suffering harm and report any concerns to the Designated Person for Child Protection. All staff must recognise that it is a statutory duty to ensure that children are protected from harm.

The four categories of child abuse and exploitation are as follows:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

Physical Abuse

Physical abuse may include: hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child including the deliberate fabrication or causation of illness in a child.

This may be recognised by:

- physical injury such as bruising, bite marks, burns and scalds, fractures but also by aggressive behaviour. It may also be an indicator of concern where a parent gives an explanation inconsistent with the injury or gives several different explanations for the injury. It is not appropriate for any member of staff to undress, photograph or body map any child in an attempt to see physical injury. This is the role of the child protection and investigating agencies.

Emotional Abuse

Emotional abuse may include: the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development, mental health, behaviour and self-esteem. This may be caused by conveying to children that they are worthless, unloved or unvalued or by developmentally inappropriate expectations being made or by causing children to frequently feel frightened, or the exploitation or corruption of children.

This may be recognised by:

- developmental delay, attachment issues, aggressive behaviour, appeasing behaviour, watchfulness or stillness, low self-esteem, withdrawn or a loner, or having difficulty in forming relationships. Emotional abuse may be difficult to recognise as signs are usually behavioural rather than physical. Signs of emotional abuse may be associated or similar to other forms of abuse so presence of emotional abuse may indicate other abuse is prevalent as well.

Sexual Abuse

Sexual abuse may include: involving or forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. Such activities may involve sexual acts (penetrative or non-penetrative) or may include involving children in watching, or taking part in pornographic material, or encouraging children to behave in sexually inappropriate ways.

This may be recognised by:

- inappropriate sexualised conduct, age inappropriate sexualised play or conversation, sexually harmful behaviour – contact or noncontact, self-harm, eating disorders, continual, inappropriate or excessive masturbation, anxiousness or unwillingness to remove clothes – sports/PE etc, pain or itching in the genital area, blood on underclothes, bruising in the genital region and/or inner thighs etc.

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/college child-on-child abuse policy and procedures, 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

Neglect

Neglect may include: the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development (growth and intellect) such as failing to provide adequate food, clothing, shelter (including keeping children safe), or neglect of or unresponsiveness to a child's basic emotional needs.

This may be recognised by:

- being constantly hungry, constantly tired, have a poor state of clothing, be emaciated, have untreated medical problems, be frequently late or have poor or non-attendance at school, have low self-esteem, display neurotic behaviour and/or have poor social relationships, have poor personal hygiene. A neglected child may also be apathetic, fail to thrive, or be left with or in the care of adults under the influence of alcohol or drug misuse.

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 monitoring/incident form shown at appendix 2 or similar, prior to each conference and core group meeting.
- The completed monitoring form will be kept on the pupil's separate child protection file (that should be separate from the school record) and copies made available for all conferences and core group meetings.
- The designated safeguarding lead will notify the allocated social worker if the child is removed from school roll, suspended, permanently excluded or goes missing.

Attendance

The Trust holds a robust attendance policy and works with EWO services to promote and monitor attendance patterns. Attendance concerns are shared with DSL /DDSL and acted on accordingly.

Where parents are opting to home educate their children, meetings will be held with parents and DFE guidance will be followed.

SEND Pupils/Vulnerable Pupils

The Trust is aware that children with special education needs may be more vulnerable to harm and abuse and may be more likely to experience bullying. They may also have difficulty in reporting harm and abuse due to communications difficulties and professionals may miss vital indicators. Trust policies reflect these issues and recognise that staff need to be able to help this group to overcome barriers to seeking help, including supporting pupils through the taught curriculum.

Trust Policies reflect the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; communication barriers and difficulties in overcoming these barriers.

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](#)

Awareness of these additional barriers is reflected in the training for staff.

The Trust is aware that some pupils may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, children's social care or other agencies in order to overcome problems or keep them safe.

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

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy and speaking the DSL or DDSL.

Intimate Care

The Trust recognises that intimate care involves risks for children and adults as it may involve staff touching intimate parts of a pupils body. Within the Trust best practice will be promoted and all adults (including those involved in intimate care and staff in the vicinity) will be encouraged to be vigilant at all times, to seek advice where relevant and take account of safer working practice.

The Intimate Care Policy & staff code of conduct, gives detailed advice and guidance on how to minimise the

risks to children. This is provided to all members of staff.

Children are taught personal safety skills carefully matched to their level of development and understanding throughout the year.

Staff are also made aware of children who have 'invisible' needs and may require a medical Health Care Plan or co-ordinated approach to support these.

If any member of staff has concerns about physical changes to a child's presentation, e.g. marks, bruises, soreness etc. they will immediately report concerns to the appropriate designated person for safeguarding in line with safeguarding procedures.

Domestic Abuse Sexual Violence (DASV)

Domestic or Family Violence adversely affects children, whether or not it is significant enough to warrant action under Child Protection Procedures.

When a member of staff becomes aware that a child may be living in a household where there is emotional, physical or sexual violence, they should attempt to find out whether the family are receiving help and should consider contacting the DASV lead in school.

Children with family members in Prison

Children with a family member in prison are at risk of poor outcomes including, poverty, stigma, isolation and poor mental health. Staff who are aware of families in these circumstances need to inform the DSL.

Age appropriate guidance is available on the government website to help children who may be required to attend court or give evidence.

<https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>

Bullying

Bullying in school can take several forms. It can be direct (either physical, or verbal), or indirect (for example, being ignored, or not spoken to), or cyber bullying using phones or the internet. There are three key characteristics of bullying:

- Bullying is ongoing. It is not the same as a one off conflict between two individuals, or a random unprovoked aggressive act.
- Bullying is deliberate and often premeditated.
- Bullying is unequal – it involves a power imbalance (this can result from size, number, higher status, or as a result of having access to limited resources).
- **All** staff should always discuss instances of bullying with a member of the SLT. (See Anti-Bullying policy)

Unsubstantiated, Unfounded, false or malicious reports

If a report is determined to be unsubstantiated, unfounded, false or malicious the DSL should consider whether the child who has made the allegation is in need of help or may have been abused by someone else.

If a report is shown to be invented or malicious The Trust will consider whether any disciplinary action is appropriate against the individual who made it.

Further information is available on the link below:-

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Child Trafficking

Child trafficking is the recruitment and movement of children for the purpose of exploitation; it is a form of child abuse. Children may be trafficked within the Country, or from abroad. It overlaps with Sexual Exploitation and Private Fostering. Children may be trafficked for:

- Sexual exploitation
- Labour exploitation
- Domestic servitude
- Cannabis cultivation
- Criminal activity
- Benefit fraud
- Forced marriage
- Moving drugs

KCSIE 2026 states: All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and seminudes images and/or videos can be signs that children are at risk.

Child Criminal Exploitation

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and move money from urban areas. Key indicators are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs or money. Like other forms of abuse and exploitation, county lines exploitation:

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

NB:- it is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

Potential vulnerabilities

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

- Having a prior experience of neglect, physical and/or sexual abuse.
 - Lack of a safe/stable home environment, now or in the past (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](#)

Children who are lesbian, gay, bi, trans or gender questioning (LGBT)

Children being LGBT is not a safeguarding concern in itself, but it is important to be aware that they can be targeted by others. This can increase the vulnerability of these children. It is important to consider helping gender questioning children to identify a trusted adult who they can talk to as well as provide safe places within school to talk about their concerns. Gender questioning inclusion is part of [Relationships Education and Relationships and Sex Education curriculum](#).

The CASS review identified that caution is necessary for children questioning their gender as there remain many unknowns and may well have wider vulnerabilities, including having complex mental health and psychosocial needs. School should take a cautious approach and consider the broad range of their needs, in partnership with the child's parents.

There is a range of support available to help schools address homophobic, biphobic and transphobic bullying and abuse.

The trust has a working party on these issues that can be consulted if needed.

Private Fostering

Private Fostering arrangement is one that is made privately between two parties without the involvement of the Local Authority for a child under the age of 16 (18 if disabled). This arrangement would be with someone who is not a parent or close relative, and lasts 28 days or more.

Private Fostering is used as a form of childcare by parents who are not able to take care of their child on a day to day basis, for whatever reason. However, unreported Private Fostering Arrangements can be used in order to exploit children.

The Law requires that the Local Authority should be informed at least six weeks in advance of a Private Fostering

arrangement or 48 hours after the arrangement has been made if in an emergency. Social Workers will:

- Check the suitability of the Private Foster Carers through checks and assessment;
- Make regular visits to the child and monitor the standard of care; and
- Ensure that Private Foster Carers and birth families have all the necessary information and advice they require.

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- fmufcdo.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

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 AI 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, breaktimes and lunchtimes.

There are a range of approaches schools can adopt to achieve a mobile phone-free environment, and it is the responsibility of headteachers 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.

Use of Photo/Media/Images

This would apply to all forms of publications; print, film, video, DVD, on websites and in the professional media.

Consent forms signed by parents and guardians can be used as blanket permission for the taking and publication of images when you are working with the same group of children and young people continuously or over a long period of time. New permission forms may need to be signed for one off events, or when the conditions of which

permission was granted have changed.

Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan.

Not all children feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, adults should seek the pupil's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some pupils are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Staff should listen, observe and take note of the child's reaction or feelings and, so far as is possible, use a level of contact and/or form of communication which is acceptable to the pupil. This is particularly important for children with SEND or intimate care needs.

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil, in one set of circumstances, may be inappropriate in another, or with a different child.

Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Adults should therefore, use their professional judgement at all times. Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority.

If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances should be immediately reported to the Headteacher and recorded. Where appropriate, the manager should consult with the Local Authority Designated Officer (the LADO).

Extra caution may be required where it is known that a child has suffered previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. They also should recognise that these pupils may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries.

A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each child. Pupils with special educational needs or disabilities may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the pupil's needs, consistently applied and open to scrutiny.

In certain curriculum areas, such as PE, drama or music, staff may need to initiate some physical contact with children, for example, to demonstrate technique in the use of a piece of equipment, adjust posture, or support a child so they can perform an activity safely or prevent injury. Physical contact should take place only when it is necessary in relation to a particular activity. The extent of the contact should be made clear and undertaken with the permission of the pupil. Contact should be relevant to their age / understanding and adults should remain sensitive to any discomfort expressed verbally or nonverbally by the pupil.

Any incidents of physical contact that cause concern should be reported to the Headteacher and parent or carer. It is good practice that all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers and pupils informed of the extent and

nature of any physical contact may also prevent allegations of misconduct or abuse arising.

Procedure for non-collection of pupils

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

Positive Handling

As a trust we follow the Team Teach principals

The law and guidance for schools states that adults may reasonably intervene to prevent a child from:

- committing a criminal offence
- injuring themselves or others
- causing damage to property
- engaging in behaviour prejudicial to good order and to maintain good order and discipline.

Great care must be exercised in order that adults do not physically intervene in a manner which could be considered unlawful. Under no circumstances should physical force be used as a form of punishment. The use of unwarranted or disproportionate physical force is likely to constitute a criminal offence.

Where the school judges that a child's behaviour presents a serious risk to themselves or others, they must always put in place a robust risk assessment which is reviewed regularly and, where relevant, a physical intervention plan.

In all cases where physical intervention has taken place, it is good practice to record the incident and subsequent actions and report these to the Headteacher and the child's parents. Similarly, where it can be anticipated that physical intervention is likely to be required, a plan should be put in place which the pupil and parents/carers are aware of and have agreed to. Parental consent does not permit settings to use unlawful physical intervention or deprive a pupil of their liberty.

Staff should:

- adhere to the school behaviour policy and individual behaviour plans
- always seek to defuse situations and avoid the use of physical intervention wherever possible
- where physical intervention is necessary, only use minimum force and for the shortest time needed
- NOT use physical intervention as a form of punishment

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 headteacher. Allegations against the head teacher will be referred to the Chair of the Governing Board.

Allegations that meet the harms threshold

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

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

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

This applies to any child the member of staff/volunteer has contact within their personal, professional or community with police or children's social care. The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification.

It is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

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

The head teacher/principal will always consult with the LADO immediately as soon as school is aware of an allegation.

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

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

The designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.

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

It is important to bear in mind that although the concern may relate to an individual pupil/student, other pupil/students may also be at risk. The 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.

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:
 - o Croydon Council's confidential whistle blowing email address – SchoolWhistleBlowing@croydon.gov.uk
 - o The Ofsted whistle-blowing line on **0300 123 3155**/ whistleblowing@ofsted.gov.uk
 - o [Whistleblowing for employees](#)
 - o 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
 - o 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.

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 pg71*

- 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 headteacher/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:
 - o seek written confirmation from the agency that the agency has carried out all necessary checks on the individual.
 - o request written confirmation of the outcome of all checks
 - o request written confirmation that an enhanced DBS certificate has been received by the agency
 - o 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](#)

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](#)

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.

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

Other relevant safeguarding guidance

Schools can access additional guidance, policies and procedures at:

[Education Toolkit](#)

[DfE Alternative Provision guidance](#)^[LH1]

[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](#)
