St Elphege's RC Infant and Junior & Regina Coeli Catholic Schools

SANCTA FAMILIA
CATHOLIC ACADEMY TRUST

Safeguarding & Child Protection Policy and Procedures			
Scope:		St Elphege's and Regina Coeli Schools	
Date Adopted:		December 2015	
This Review:		Autumn Term 2026	Annually, or when regulations change
Next Review:		Autumn Term 2027	
Approved	HT:	R. Hawkes T. Christofara	Full Governing Body
	Governor:	T Tamplin	

St Elphege's RC Infant and Junior & Regina Coeli Catholic Schools

Safeguarding Statement

St Elphege's and Regina Coeli Catholic Primary Schools will give every child the best possible education because each individual is uniquely created and precious to God. As a Catholic community, guided by the Holy Spirit we will follow the example of Jesus Christ in all aspects of daily life.
We are committed to safeguarding and promoting the welfare of children in all circumstances and expect all staff and volunteers to share this commitment.
We ensure that we:

- practise safer recruitment in checking the suitability of staff and volunteers to work with children
- equip the children with the skills needed to keep themselves safe
- establish a safe environment in which children can learn and develop in confidence and independence
- work within the school's Safeguarding Policy

The Safeguarding Policy has clear procedures in place which all staff are aware of. Parents and carers are able to read the policy on the school website and are free to discuss issues surrounding policy and practice with the Executive Headteacher, Head Teachers or Chair of Governors.
Sometimes we may need to share information and work in partnership with other agencies where there are concerns about a child's welfare. We will ensure that our concerns are discussed with the parents/carers first, unless we have reason to believe that such a move would be contrary to the child's welfare.

If you are concerned about a child's welfare, please record your concern, and any observations or conversation heard, and report to one of the Designated Persons as soon as possible the same day. Do NOT conduct your own investigation.

If your concerns relate to the actions or behaviour of a member of staff or volunteer within the school (which could suggest that s/he is unsuitable to work with children), you should report this to the Head Teacher or Executive Head Teacher in confidence. If your concern is in relation to the Head Teacher or Executive Head Teacher, you should report your concerns to the Chair of Governors who can be contacted through the school office.

Details of the Designated Persons St Elphege's and Regina Coeli Catholic Schools can be found on the next page.

Safeguarding & Child Protection
Policy & Procedures

September 2026

St Elphege's	Regina Coeli
Designated Person for Safeguarding Mr L Hawkes 0208 669 6306 cp@stelphegesrcschools.org.uk	**Designated Person for Safeguarding** Mrs T Christoforou 020 8688 4582 office@reginacoelischool.co.uk
Deputy Safeguarding Leads Mrs R Duffy, Mrs V Laffin, Mrs N Hutchinson, Mrs N Hawkes, Mrs S Michaels, Mrs A Glanville, Ms P Narenthiran, Ms C Dall, and Miss C Wright - **0208 669 6306**	**Deputy Safeguarding Leads** Mrs M Spain, Mrs C Guilmartin-Cole, Mrs J Mabey, Mrs M Goodridge, Mrs Abassi – **020 8688 4582** office@reginacoelischool.co.uk
St Elphege's and Regina Coeli Deputy Safeguarding Lead Ms A Cunniffe - 0208 669 6306 /0208 688 4582	
Safeguarding Governors Mrs A Glanville & Mr Sanjay Wadvani **Chair of Governors** Mr T Tamplin *Please speak with a member of the school office / SLT if you wish to contact the Safeguarding Governor or Chair of Governors* **Sancta Familia Safeguarding Lead** Ms Sarah McCourt	
Children's First Contact Centre 020 8770 6001 **Out of Hours:** 0208 770 5000 x9 Click Here to make a referral. childrensfirstcontactservice@sutton.gov.uk **Education Lead – Gill Bush:** 07701280793 / 0208 323 0423 gillian.bush@cognus.org.uk **Education Manager – Hayley Cameron:** 07736338180 hayley.cameron@cognus.org.uk	**Croydon MASH Team** MASH Service Manager: **Phillip Larmond** phillip.larmond@croydon.gov.uk **Urgent Referrals-**0208 255 2888 **Professionals Consultation Line** 0208 726 6464 **Out of Hours:** 020 8726 6000 ssd-emergency-duty-team@croydon.gov.uk Click here to make a referral.
Sutton LADO 0208 770 4776 07834 106 164 lado@sutton.gov.uk	**Croydon LADO Service Manager** **Steve Hall** 020 8726 6000 Ext.24334 Mobile: 07825 830328 lado@croydon.gov.uk **Croydon LADO** **Jane Rowe** Email: jane.rowe@croydon.gov.uk Mobile: 07716 092630 schoolwhistleblowing@croydon.gov.uk

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Section 1: Introduction

We are committed to safeguarding children and young people and we expect everyone who works in our schools to share this commitment. All adults in our schools take all welfare concerns seriously and encourage children and young people to talk to us about anything that is worrying them.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Contextual safeguarding (safeguarding incidents outside the school) must also be considered when looking at individual cases. All assessments should include this wider picture.

All staff must have read and understood:

- Part One of Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- What to do if you're worried a child is being abused: advice for practitioners
- Section 3 of Early years foundation stage (EYFS) statutory framework (for children aged 0 to 5 in school-based nurseries and reception).
- Safeguarding and Child Protection Policy including procedures to deal with child-on-child abuse
- Behaviour Policy including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Staff Code of Conduct including how to recognise and report low-level concerns, allegations against staff and whistleblowing
- The school's policy and response to children who are absent from education, particularly on repeat occasions and/or prolonged periods – this is contained in XXXX – specify whether in this policy or Attendance Policy
- Mobile Phone Policy
- Inclusion Policy

Copies of these policies and Part One of Keeping Children Safe in Education 2026 will be provided to all staff on induction.

All staff must also be aware of:

- Who the Designated Safeguarding Lead and Deputies are and what their roles are
- How to follow the school's reporting and record-keeping procedures
- What to do if a child tells them they are being abused, exploited, or neglected
- The signs and indicators of abuse and neglect and how to report concerns

School leaders and staff that work within school must have also read – Part 1 of Keeping Children Safe in Education (September 2026).

All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

"THE WELFARE OF THE CHILD IS PARAMOUNT"

At St Elphege's and Regina Coeli Catholic Schools the safety and welfare of our pupils and students is of the utmost importance. We will ensure that pupils in our care are protected from maltreatment, impairment of their mental and physical health or development and that they are growing up in circumstances consistent with the provision of safe and effective care. We take action to enable all children to have the best outcomes.. We have created a culture of vigilance where pupils' welfare is actively promoted. Pupils are listened to and feel safe. We maintain an 'it could happen here' attitude.

We know children learn best when they are healthy, safe and secure, when their individual needs are met and when they have positive relationships with the people caring for them. We aim to have schools which are welcoming, safe and stimulating and where children are able to enjoy learning and grow in confidence. All necessary steps are taken to keep children safe and well.

Because of the day-to-day contact with children, our staff are trained to identify when a pupil may be at risk of harm and abuse and they report their concerns immediately. We have a duty to safeguard and promote the welfare of our pupils and students under the Education Act 2002 and Children Act 1989/2004 through identifying any child welfare concerns and taking action to address them in partnership with families and other agencies where appropriate.

Children are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

We take a whole-school approach to safeguarding. This means that safeguarding and child protection are at the forefront of, and underpin, everything we do. Pupils and students are listened to and feel safe. We have created a culture of vigilance where pupils' welfare is actively promoted through our pastoral care, FAITH Values, Catholic Social Teaching and Golden Rules.

Pupils are taught about safeguarding and how to keep themselves and others safe, including online. Our preventative education programme is taught through the school's inclusive and high-quality sex and health education (RSHE) curriculum. This curriculum helps to prepare pupils for the opportunities and responsibilities of adult life and support prevention of harms by helping young people understand and identify when things are not right. Preventative education is also reinforced through assemblies and workshops, and is fully inclusive and age appropriate. We take a zero tolerance approach to all forms of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. We promote an inclusive, anti-discriminatory culture where racism, and other forms

of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.

We are committed to ensuring that our pupils are taught a curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Relevant issues for schools will be taught through Relationships Education (for all primary pupils and students) and Health Education (for all pupils and students in state-funded schools) which became compulsory in September 2020 and was updated in July 2025. Schools have flexibility to decide how they discharge their duties effectively within the first year of compulsory teaching and are encouraged to take a phased approach (if needed) when introducing these subjects.

Please refer to the statutory guidance (currently under review) for more information:
Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk)

The schools' policy on Relationships, Sex & Health Education is available on the school websites.

In addition to our child protection policy and procedures, we have policies and procedures to cover the roles of staff, pupils/students and parents in respect of health and safety, anti-bullying, e-safety, positive handling, racism and discrimination, induction, SEND, Pupil Premium, Equality, Attendance, Positive Behaviour, E-Safety (including Filtering and Monitoring/mobile phone use) Intimate Care, Medical, Healthy Relationships, Data Protection, Whistleblowing and Educational Visits. We also ensure that issues of child protection are raised with students through the Personal, Social and Health Education (PSHE) curriculum and the RSHE curriculum. Our policy applies to all staff, governors and volunteers working in the school and pupils/students and parents are informed about this and our other policies in the school prospectus and on our website.

Section 2: Purpose and Aims

The elements in this policy and our procedures related to this aim to:

- Ensure safe recruitment practice in checking the suitability of all our staff and volunteers to work with children including the completion of risk assessments;
- Ensure staff are appropriately trained;
- Raise awareness of safeguarding/child protection issues amongst all staff, supply, agency, and volunteers and of what to do if they have concerns. This includes raising awareness of any current issues such as: Child abduction and community safety incidents; Child Criminal Exploitation (CCE); Child Sexual Exploitation (CSE); County lines; Children and the court system; Children missing from education; Children with family members in prison; Cybercrime; Domestic abuse; Homelessness; Mental health; Modern Slavery; Preventing radicalisation; The Prevent duty; Channel; Sexual violence and sexual harassment between children in school; Serious Violence; So-called 'honour'-based abuse; FGM; Forced marriage (see 'Keeping Children Safe in Education', DfE, September 2026).
- Ensure that volunteers are appropriately supervised;

- Ensure that our procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are robust;
- Ensure that our links with relevant agencies are effective and that we co-operate and work in a partnership regarding child protection matters, including attendance at case conferences and core group meetings;
- Ensure that our school environment is safe and is one in which children feel secure and are encouraged to talk freely about anything that concerns them;
- Ensure that children know there are adults in the school who they can approach if they are worried about anything;
- Ensuring that students have a safe space to speak to a trusted adult, where they can raise concerns.
- Ensure that the curriculum and other provision, including opportunities in the Health and Wellbeing/PSHE curriculum, develop and equip our pupils with the skills needed to feel safe and adopt safe practices to help them recognise risks and stay safe from abuse;
- Ensure that we support pupils who have been abused or may be at risk of harm in accordance with any agreed child protection plan;
- Ensure that we respond appropriately to any concern or allegation about a member of staff or volunteer;
- Ensure that staff follow accepted "safe practice" principles when working with pupils;
- Ensure that pupils are protected from all forms of harm.
- Ensuring that the school creates an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

If there are Child Protection concerns, the London Child Protection Procedures (London Safeguarding Children Board, 7th edition, 2022, updated March 2023) must be followed. This can be found at www.londoncp.co.uk . The Local Safeguarding Children Partnership (LSCP) has adopted these procedures.

If lower level concerns or needs (i.e. not child protection) are identified about a particular pupil/student the Early Help Assessment Tool should be used and can be found at:

Sutton – Referral Form

Croydon – Referral Form

In addition to our overarching Safeguarding and Child Protection Policy and Procedures, the following policies should also be considered:

Induction, SEN, Pupil Premium, Equality, Health and Safety, Safer Recruitment, Attendance, Behaviour, Anti-bullying, E-Safety, Positive handling, Intimate Care, Drug and Alcohol, Medical, Healthy Relationships, Data Protection, Whistleblowing, Educational Visits and E-Safety (including the use of mobile devices).

All staff have a responsibility to provide a safe environment in which children can learn. Because of their day-to-day contact with children, school staff are best placed to identify concerns early, provide help for children and prevent concerns from escalating. All staff should

be prepared to identify children who may benefit from Family Help. Family Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

The Teachers' Standards 2012 state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff must be 'professionally curious' - this means maintaining an open mind and asking questions to understand what is happening to a child. 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 (or a deputy) if they have concerns about a child.

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice based harm and ensure that concerns shared with the designated safeguarding lead (or a deputy).

It is also important that staff determine how best to build trusted relationships which facilitate communication with children and young people.

Read: What to Do if You're Worried a Child is Being Abused

Section 3: Links to other guidance

Although this list is not exhaustive, this policy and procedure also accords with:

- Keeping Children Safe in Education 2026 (publishing.service.gov.uk)
- Working together to safeguard children - GOV.UK (www.gov.uk) – Children's guide now included.
- Early years foundation stage (EYFS) statutory framework - GOV.UK
- Children missing education: statutory guidance for local authorities and schools - GOV.UK
- Education inspection framework (EIF) - GOV.UK (www.gov.uk)
- Education inspection framework: for use from November 2025 - GOV.UK
- Inspecting schools: guide for maintained and academy schools - GOV.UK (www.gov.uk)
- School inspection: toolkit, operating guide and information - GOV.UK (November 2025)
- Inspecting further education and skills: guide for providers - GOV.UK (www.gov.uk)
- Further education and skills inspection: toolkit, operating guide and information - GOV.UK (November 2025)
- Early years inspection handbook - GOV.UK (www.gov.uk)
- Early years inspection: toolkit, operating guide and information - GOV.UK (November 2025)
- Independent school inspection: toolkit, operating guide and information - GOV.UK

(November 2025)
- The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)
- Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk)
- Disqualification under the Childcare Act 2006 - GOV.UK (www.gov.uk)
- Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)
- What to do if you think a child is being abused (DfE March 2015)
- Section 5B of the Female Genital Mutilation Act (2003) Section 74 of the Serious Crime Act 2015
- Female Genital Mutilation: Resource Pack (Updated February 2023)
- Regulated activity in relation to children (2012)
- Teacher Status Checks (Updated April 2025)
- Child sexual exploitation: definition and guide for practitioners - GOV.UK (www.gov.uk)
- Understanding sexualised behaviour in children | NSPCC Learning
- Searching, Screening and Confiscation (publishing.service.gov.uk)
- The designated teacher for looked-after and previously looked-after children (publishing.service.gov.uk)
- Promoting the education of looked-after children and previously looked-after children (publishing.service.gov.uk)
- Criminal exploitation of children and vulnerable adults: county lines (accessible version) - GOV.UK (www.gov.uk)
- Data protection: The Data Protection Act - GOV.UK (www.gov.uk)
- Data protection in schools - Guidance - GOV.UK (www.gov.uk)
- Mental health and behaviour in schools (publishing.service.gov.uk)
- young-people-who-self-harm-a-guide-for-school-staff.pdf (rcpsych.ac.uk)
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- Safeguarding children and protecting professionals in early years settings: online safety considerations for managers - GOV.UK (www.gov.uk)
- Maintained schools governance guide - Guidance - GOV.UK (www.gov.uk)
- Academy trust governance guide - Guidance - GOV.UK (www.gov.uk)
- Teaching online safety in schools - GOV.UK (www.gov.uk)
- Education for a Connected World (publishing.service.gov.uk)
- Reducing the need for restraint and restrictive intervention - GOV.UK (www.gov.uk)
- Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk)
- Positive environments where children can flourish - GOV.UK (www.gov.uk)
- Safeguarding and remote education - GOV.UK (www.gov.uk)
- When-to-call-police-guidance-for-schools-and-colleges.pdf (governmentevents.co.uk)
- Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024) - GOV.UK (www.gov.uk)
- After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK (www.gov.uk)
- Meeting digital and technology standards in schools and colleges - Guidance - GOV.UK (www.gov.uk)
- Implementation of the Marriage and Civil Partnership (Minimum Age) Act 2022 - GOV.UK (www.gov.uk)
- Working together to improve school attendance - GOV.UK (www.gov.uk)
- School suspensions and permanent exclusions - GOV.UK (www.gov.uk)
- Improving behaviour in schools - GOV.UK (www.gov.uk)
- Gender Questioning Children - non-statutory guidance (education.gov.uk)
- Mobile phones in schools - February 2024 (publishing.service.gov.uk)
- Alternative provision - GOV.UK

- Artificial Intelligence - DfE Guidance
- Unregistered independent schools and out-of-school settings - GOV.UK
- Out-of-school settings: safeguarding guidance for providers - GOV.UK
- DfE whistleblowing policy - GOV.UK
- Blowing the whistle to the Department for Education - GOV.UK
- Use of reasonable force in schools - GOV.UK
- Children's Wellbeing and Schools Bill
- https://www.gov.uk/government/news/implementation-of-the-marriage-and-civil-partnership-minimum-age-act-2022

Section 4: Safer Recruitment

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of the children in education.

In our recruitment and selection of staff and volunteers we will always adhere to the government guidance contained within "*Working Together to Safeguard Children*" (*July 2018 – Updated July 2022 – currently under consultation)* and '*Keeping Children Safe in Education (DfE 2026)*.

We will ensure that:

- For good practice, our interview panel includes at least one member who has completed safer recruitment training,
- that we always follow up gaps in previous employment,
- that we always require specific references from employers for the last 5 years
- that for all posts, paid and voluntary, the appropriate Disclosure and Barring Service (DBS) information has been received.
- In addition to obtaining the DBS certificate, anyone who is employed to teach will undergo an additional check to ensure that they are not prohibited from teaching.
- We consider carrying out online checks for shortlisted candidates and have updated our Safer Recruitment Policy to reflect this. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. Schools and colleges should inform shortlisted candidates that online searches may be done as part of due diligence checks.

As a school, we are aware of and take notice of 'Disqualification by Association' guidance (July 2018). From 1st September 2018, schools will no longer have to ask staff questions about cautions or convictions of someone living or working in their household.

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018, Part 2 Childcare (Disqualification) Regulations 2018, section 9, states that such a disqualification applies only to 'work in domestic premises'.

A change in law means that Disqualification by Association will only apply on domestic premises. However, Disqualification under the Childcare Act 2006, still applies to staff themselves.

For staff who work in childcare provision or who are directly concerned with the management of such provision, the school needs to ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (disqualification) Regulations.

All staff have a DBS check as they could come into contact with children at any time.
We find out about any staff disqualification from their DBS check and from the Children's Barred List e.g. relevant offences.

We keep a single central record of all staff with the date and outcome of their DBS check so at all times staff, students and parents can be assured that this has been done.

What is not known from a DBS check is whether a person has a child placed under a care order, whether they have had a childcare registration cancelled or refused for any reason other than non-payment of fees or whether there have been any relevant overseas convictions.

All staff will have to complete an annual self-declaration stating that they are not disqualified under the Childcare Act 2006 as amended in 2018. This information will be recorded alongside the Single Central Register.

It must be noted that 'relationships and associations' that staff have in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the school.

If you do have something to declare or your circumstances change, please seek advice from the Head teacher.

For more information, please refer to Part 3 of KCSIE (2026).

(Please refer to our Safer Recruitment Policy for further information).

Section 5: Contractors and Outside Agencies

We expect all contractors providing services within the school whose staff have access to school premises to comply with this policy and the attached procedure, as well as the staff code of conduct. The contractor or individual must agree to this in writing.
We require any contractor or organisation delivering a service on behalf of the school or using our premises to provide evidence they adhere to the above requirements in terms of recruitment, selection, training and supervision of their staff and any volunteers, in particular DBS information.

Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check will be required (not including barred list information).

Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.
If a contractor working at a school is self-employed, the school will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

The identity of contractors and their staff will be checked on arrival at the school.
This policy and procedure will also apply to any organisation using school facilities. They must agree to this in writing.

Where the governing body hires or rents out the school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will ensure that appropriate arrangements are in place to keep children safe. The governing body will seek assurance that the body concerned has received relevant safeguarding training and that appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing body will also ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
If school receive allegations about staff using their premises to run activities for children, they should follow their own safeguarding policy, including contacting the LADO.

For more information on regulated activity:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

MUSIC TUITION

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

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

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

The school should:

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

Section 6: Site Security

All people on the site must adhere to adhere to the guidelines within this policy. Laxity can cause potential safeguarding issues to arise. Therefore:

- Gates should be locked at playtimes and lunchtimes.
- All exit doors should be closed to prevent intrusion.
- The school will not request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's' relatives or other visitors attending a sports day). The Headteacher will use his/her professional judgment about the need to escort or supervise visitors.
- For visitors who are attend in a professional capacity, their ID will be checked and assurance will be sought that the visitor has had the appropriate DBS check (or that the visitor's employers have confirmed that their staff have appropriate checks).
- Children will only be allowed home with adults with parental responsibility or confirmed permission.
- Children should never be allowed to leave school alone during school hours, and if collected by an adult, signed out.
- Should a child leave the school premises without permission then staff have been informed never to chase after a child, but rather to report immediately to the office. Then parents and police will be informed of the circumstances.
- All visitors are required to sign in at the main school reception where they will be given a visitor's badge. This will be returned to the main school reception on departure.

Section 7: Data Protection – Information and Records

The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.

All staff must maintain records and obtain and share information (with parents, carers, other professionals working with the child, police, social services and Ofsted as appropriate) to ensure safe and efficient management of the school, and to help ensure the needs of all children are met. All staff must enable a regular two-way flow of information between parents and school.

Confidential information and records about children are held securely and only accessible and available to those who have a right or professional need to see them. The Head teacher is aware of responsibilities under the latest Data Protection Act in England, including those imposed under the General Data Protection Regulation (GDPR) passed by the European Union. As a school we believe that protecting the data we hold about our children is a fundamental part of our safeguarding process and treat this information with as much importance as protecting the child themselves.

All staff understand the need to protect the privacy of the children in their care as well as the legal requirements that exist to ensure that information relating to the child is handled in a way to ensure confidentiality. Parents and carers are given access to all records about their child provided that no relevant exemptions (information which could cause harm to the child or any other individual) apply to their disclosure under the DPA.

The GDPR imposes more stringent requirements on entities that deal with people's personal data. In school, this applies to all personally identifiable information held on staff, children and parents. We are fully committed to ensuring that it upholds the new rights granted to a person under the GDPR. Parents and carers should be aware that there are legal requirements that supersede data protection regulations. The school is required to share data with certain agencies under legal obligations.

For more information:
Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)

Section 8: Definition of Safeguarding and Child Protection

Safeguarding: is about every child

In relation to children and young people, safeguarding and promoting their welfare is defined in ***Keeping Children Safe in Education (September 2026)*** as:

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

In relation to children and young people, safeguarding and promoting their welfare is defined in ***Working Together to Safeguard Children (December 2023, Page 7/8)*** as:

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

Child Protection: Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online ***(Working Together to Safeguard Children (December 2023).***

Section 9: The four main forms of abuse

All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff should be aware of the indicators of abuse, neglect, and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

If you have a concern or have received a disclosure that a child has been sexually abused, you must follow your reporting procedures and contact the Children's First Contact Service.

Please refer to the Sutton LSCP Multi-Agency Protocol for Child Sexual Abuse and LSCP, CSA Toolkit and resources from the CSA Centre for more information:

Sutton Local Safeguarding Children Partnership - LSCP Protocols
Child Sexual Abuse
The impacts of child sexual abuse | CSA Centre

Neglect: 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. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

In ***Working Together to Safeguard Children (December 2023),*** the definition of Neglect is as follows:

Neglect: 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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); ensure access to appropriate medical care or treatment; **provide suitable education.** It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For more information and to access Sutton's Neglect Toolkit (Updated May 2025), please click the link below:

Sutton Local Safeguarding Children Partnership - LSCP Policy & Practice (suttonlscp.org.uk)

Croydon Safeguarding Children Partnership (CSCP)

Email: CSCP@croydon.gov.uk
Tel: 0208 604 7275

Croydon/CSCP Threshold document

croydonsafeguarding.org/guidance-policy/neglect-strategy

Experiences of neglect by Howarth's classifications - A3 Poster.pdf (suttonlscp.org.uk)

For more information, go to: https://tacklechildabuse.campaign.gov.uk

Section 10: Specific Safeguarding Issues

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

- Body Confidence and Self-Esteem;
- Child abduction and community safety incidents;
- Child Criminal Exploitation (CCE);
- Child Sexual Exploitation (CSE);
- Consent;
- County lines;
- Children and the court system;
- Children who are absent from education;
- Children with family members in prison;
- Cybercrime;
- Dangerous dogs;
- Domestic abuse;
- Homelessness;
- Mental health;
- Modern Slavery and the National Referral Mechanism;
- Preventing radicalisation;
- The Prevent duty;
- Channel;
- Sexual violence and sexual harassment between children in school's and colleges;
- Serious Violence;
- honour-based abuse (including FGM and Forced Marriage)
- FGM;
- FGM mandatory reporting duty for teachers;
- Forced marriage;
- Online Safety – New risks (misinformation, disinformation, conspiracy theories);
- Urban exploring

Please note this is not an exhaustive list – but are an indicator of some of the key issues of which staff may become aware.

See: Appendix A for further safeguarding definitions

See: Appendix B for more information: Keeping children safe in education 2026

***Please note this is not an exhaustive list - but are an indicator of some of the key issues of which staff may become aware*. See: Appendix A for further safeguarding definitions**

See: Appendix A for further safeguarding definitions
Page 181 Annex B: Further information (keepingchildrensafeineducation.co.uk)

Section 11: Community-Based Early Help Assessment

Every family can go through difficult or challenging times at some point during their lives. If you are aware of a family that is experiencing problems, they may require support to help them to deal with difficult situations and make things better. Early Help services and support should be offered as soon as a problem or difficulty starts. This is to stop things from getting worse, and to make sure that the family gets the help that they need. Early Help intervention may be provided by the established internal Pastoral Support Service of or through referral to the LA Early Help services. The Early Help Assessment Tool (EHAT) is used to find out about the family so that we can understand the difficulties that they may be experiencing. The EHAT is used when a family would like support through the LA to help them with a difficulty; when a professional working with a family recognises that they may require extra support; when a family have lots of professionals working with them and services and information needs to be organised to help make things clearer for them, where the needs of the family are unknown or unmet. Any Early Help service is entirely consent based and the family can decide at any point that they no longer wish to engage with the process. An EHAT is confidential except where there is a risk of serious harm to a child or young person.

Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

All school staff should be prepared to identify children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs.
- has special educational needs (whether or not they have a statutory Education, Health, and Care Plan).
- has a mental health need.
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- is frequently missing/goes missing from education, home or care.
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- is at risk of being radicalised or exploited.
- has a family member in prison or is affected by parental offending.
- has a parent or carer in custody, or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- is misusing drugs or alcohol themselves.
- has returned home to their family from care.
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child; and

- is persistently absent from education, including persistent absences for part of the school day.
- Early Help for families and professionals - Sutton Council
- Schools EHC list
- Eligibility Criteria for Targeted Early Help Support in Sutton.docx
- https://www.croydon.gov.uk/children-young-people-and-families/early-help-support

Signposting for families in times of need is vital, especially with the impact of the cost-of-living crisis. For further support please visit: Together for Sutton - Together for Sutton

For more information, please visit:

Sutton Local Safeguarding Children Partnership - Helping Early in Sutton (suttonlscp.org.uk)

Targeted Early Help service - Sutton Council

Home | Sutton Information Hub

Commonly asked questions – Cognus
Eligibility Criteria for Targeted Early Help Support in Sutton.docx

All Croydon Early Help referrals will go via MASH Portal

Statutory children's social care assessments and services

Where a child is suffering, or is likely to suffer from harm, a referral to local authority children's social care and if appropriate the police, must be made immediately. Referrals will follow the local referral process.

Section 12: Mental Health

We aim to promote positive mental health and wellbeing for our whole school community; pupils, staff, parents and careers, and recognise how important mental health and emotional wellbeing is. We recognise that children's mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement. Through a whole-school approach, we actively seek to promote emotional health and wellbeing by helping pupils to understand their feelings and the feelings of others.

Our role in school is to help our pupils to succeed and reach their potential by supporting them to be resilient and mentally healthy. We also have a role to ensure that pupils learn about what they can do to maintain positive mental health, what affects their mental health, how they can help reduce the stigma surrounding mental health issues and where they can go if they need help and support.

All staff should also 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. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those

whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect, exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood.

Schools have an important role to play in supporting the mental health and wellbeing of their pupils.

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. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Schools can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If you have a concern regarding the Mental Health of a child, contact your Designated Safeguarding Lead and SENCO / Inclusion DHT / Manager immediately to enable the required support to be put in place as soon as possible.

See: Appendix B for further definitions

Section 13: Children Missing in Education (CME) and Elective Home Education (EHE)

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community (KCSIE, September 2026).

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

Please note this is different to children who leave the school premises. If this happens, call the police and follow the child where possible. Do not chase.

A child on a school roll with attendance concerns, and no reason to off roll to CME, as detailed in Children Missing Education 2024. For advice, please contact attendance@cognus.org.uk . croydon/school-attendance

'Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation, or radicalisation, and becoming NEET (not in education, employment, or training) later in life' **(*Children Missing Education, September 2025*).**

A child 'Missing Education' is a child of compulsory school age who is NOT a registered pupil at a school and is NOT receiving suitable education otherwise than at a school (e.g., home educated or receiving paid for tuition). For further guidance:
Sutton LSCP CME protocol 2021.docx
Children missing education: statutory guidance for local authorities and schools - GOV.UK
Croydon-CME-Policy-Sept19.docx
Bitesize Safeguarding Training Videos and Accompanying Slides – Cognus

In response to the guidance in Keeping Children Safe in Education (2026) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones as well as an awareness of breast-ironing and honour-based abuse (including FGM and forced marriage).
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
    a. leave school to be home educated
    b. move away from the school's location
    c. remain medically unfit beyond compulsory school age
    d. are in custody for four months or more (and will not return to school afterwards); or
    e. are permanently excluded

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority.

When children are added to the admissions register, the school must record the expected start date of the pupil. If the young person does not arrive on the start date, the school should contact the local authority at the earliest opportunity. For admissions to the school, apart from at the "start of the school's youngest year", schools are required to notify the local authority "within five days when a pupil's name is added to the admission register and provide all the information held within the admission register about the pupil".
When a pupil leaves the school, the admission register must also record:

- the name of the pupil's new school; and
- the expected start date at the new school

The school must inform the local authority and supply the following information:

- the full name of the pupil;
- the full name and address of any parent with whom the pupil lives;
- at least two contact telephone numbers for the child;
- if applicable, the full name and address of the parent with whom the pupil is going to live, and the date the pupil is expected to start living there;
- the name of pupil's destination school and the pupil's expected start date there, if applicable; and
- the grounds under which the pupil's name is to be deleted from the admission register.

If this information is not provided by the parent or carer, then a Child Missing in Education (CME) form is completed and sent to the local authority.

Sutton: Children Missing in Education	Croydon: Children Missing in Education
Gill Bush: 0208 323 0423 / 0770 128 0793	0208 726 6000
cme@cognus.org.uk Children Missing Education – Cognus	ChildrenMissingfromEducation@croydon.gov.uk

Elective Home Education (EHE)

When a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will make it clear that this is not a decision we would ever recommend. We will liaise with other professionals to coordinate further discussion with parents/carers where possible. This will be particularly important where a child has SEND, is vulnerable, and/or has a social worker. Where the decision to home educate raises safeguarding concerns the DSL (or deputies) will seek further advice from Children's Social Care.

Elective Home Education – Cognus

DfE guidance for local authorities on Elective home education sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE. Although this is primarily aimed at LAs, schools should also be familiar with this guidance.

Section 14: Attendance

In accordance with KCSIE 2026 and the now statutory DfE guidance "Working Together to Improve School Attendance," attendance concerns are treated as potential **safeguarding indicators**.

Persistent or unexplained absence is escalated through safeguarding protocols and may trigger a referral to **Children's Social Care**, particularly if the child has a social worker, is a CLA/post-CLA, or is at risk of exploitation, domestic abuse, neglect, or criminal involvement.

See: Attendance Policy
School Attendance - Cognus
croydon/school-attendance

Section 15: Children Looked After (CLA)

The designated teacher for CLA, **Ms C Wright / Mrs M Spain**, has a responsibility for promoting the educational achievement of CLA and previously CLA, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

The designated lead staff and governors are also responsible for Looked after Children.
All looked after children have a Personal Education Plan (PEP), which is part of the child's care plan. This is reviewed termly. Advice and support are available through the virtual school and virtual head teacher.
The role of the **Virtual School Head (VSH)** now extends to promoting the educational outcomes of:

- Looked-after children (CLA)
- Previously looked-after children
- **Children with a social worker**
- **Children in kinship or informal care arrangements**
-

The school work closely with the Virtual School to ensure this wider group receives targeted support, has high academic expectations, and benefits from stable education pathways (KCSIE, 2026).

Children in Kinship Care

Sutton Virtual School acts as a local authority champion to promote the educational outcomes of children in kinship care. This includes children in kinship care through child arrangement orders, special guardianship and those living in kinship care who are or were looked after.

"Kinship carers are family or friends who step up, often during an unexpected crisis, to care for a child when their parents aren't able to." Kinship.org.uk

Kinship carers are usually grandparents, aunts or uncles, brothers or sisters, a stepparent, stepbrother or stepsister, or someone who isn't related but knows the child well.

Kinship – Cognus

Sutton Virtual School – Cognus
croydon-virtual-school

See: Children Looked After Policy

Section 16: Previously Looked After Children (Post-LAC)

The designated lead staff and governors are also responsible for Previously Children Looked-After.

A previously child looked-after is one who is no longer looked after in England and Wales because s/he is the subject of an adoption, special guardianship or child arrangements order which includes arrangements relating to with whom the child is to live, or when the child is to live with any person, or has been adopted from 'state care' outside England and Wales; and a child is in 'state care' outside England and Wales if s/he is in the care of or accommodated by a public authority, a religious organisation or any other organisation the sole or main purpose of which is to benefit society.

Post-CLA support arrangements are distinct to those for CLA and are responsive to the needs of the child and family using the appropriate school support systems which will include PPG but not the PEP process.

We aim to help raise previously children looked-after parents' and guardians' awareness of the PP+ and other support for previously children looked-after – this includes encouraging parents of eligible previously children looked-after to tell the school if their child is eligible to attract PP+ funding; and play a key part in decisions on how the PP+ is used to support previously children looked after.

As a school we recognise that not all Post- CLA are underachieving, while some may be underachieving and not eligible for funding. We plan to use our funding creatively to support any individual in which any area of under-performance is evident.
Refer to Pupil Premium Strategy for further information.
See: Children Looked After Policy
Sutton Virtual School – Cognus

Section 17: Internet Filtering and Monitoring and AI

Access to the internet in school is carefully monitored. This is made clear to all users through written statements where access is available, including on information displaying guest wireless access.

Our Internet provider is: London Grid for Learning through Virgin Media.

Internet access is filtered in three groups:

- **Staff**
- **Students**
- **Staff authenticated**

The schools make full use of the London Grid for Learning SchoolProtect (previously WebScreen) which actively monitors all internet traffic in the school, blocking access to unsuitable material and screening access to material which is not suitable for the user's access permissions.

All staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring at induction. The training is regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

We fully adhere to:

Meeting digital and technology standards in schools and colleges - Guidance - GOV.UK (www.gov.uk)

In-line with the updated guidance in Keeping Children Safe in Education (KCSIE) 2026 our schools have updated the Filtering and Monitoring systems in place.

Filtering and monitoring systems are used to keep pupils safe when using the schools' IT system.
Filtering systems: block access to harmful sites and content.
Monitoring systems: identify when a user accesses or searches for certain types of harmful content on school devices (it doesn't stop someone accessing it). The school is then alerted to any concerning enabling leaders to intervene and respond.

St Elphege's and Regina Coeli Schools use:
Filtering system: LGfL School Protect / LGfL Home Protect
Monitoring system: Senso
Person responsible: Designated Safeguarding Lead

All staff should be clear on and report to the DSL or Head Teacher:

- The expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of their safeguarding training. For example, monitoring what is on pupils' screens
- How to report safeguarding and technical concerns, such as if:
    - They witness or suspect unsuitable material has been accessed
    - They are able to access unsuitable material
    - They are teaching topics that could create unusual activity on the filtering logs
    - There is failure in the software or abuse of the system
    - There are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
    - They notice abbreviations or misspellings that allow access to restricted material

Senior leaders and all relevant staff need to be aware of and understand:

- What provisions the schools have in place and how to manage these provisions effectively
- How to escalate concerns when they identify them
  They're also responsible for:
    - Buying-in the filtering and monitoring system your school uses
    - Documenting what is blocked or allowed, and why

- Reviewing the effectiveness of your provision, making sure that incidents are urgently picked up, acted on and outcomes are recorded
- Overseeing reports
- Making sure staff are trained appropriately and understand their role

The DSL should take lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place - this is part of their role in taking the lead responsibility for safeguarding.
This includes overseeing and acting on:

- Filtering and monitoring reports
- Safeguarding concerns
- Checks to filtering and monitoring systems

"Over blocking"

Over-blocking is a term used in KCSIE '24 which relates to the filtering system used in schools.
"134. Whilst it is essential that governing bodies and proprietors ensure that appropriate filtering and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding."

An effective filtering system needs to block internet access to harmful sites and inappropriate content. It should not:

- Unreasonably impact teaching and learning or school administration
- Restrict students from learning how to assess and manage risk themselves.

Blocking versus Safe Search

To ensure that the curriculum can be taught effectively, terms like "sex" should not be blocked as doing so will impact on teaching and learning in the science and RSE curriculum. Instead, enabling 'safe search' will ensure inappropriate content is filtered effectively.

For more information please visit:

https://saferinternet.org.uk/blog/2025-appropriate-filtering-and-monitoring-definitions-published

As outlined in KCSIE 2026, schools must consider the implications of **emerging technologies**, including **generative AI**, when reviewing filtering and monitoring effectiveness. Our safeguarding team and DSL have evaluated generative AI and large language models (LLM) to ensure their use aligns with the school's safeguarding framework. The schools use Google Gemini – see AI policy on school website.

We use the DfE's "Plan Technology for Your School" service to self-assess digital infrastructure, including firewall, filtering, and monitoring tools. Our reviews ensure systems are **effective, age-appropriate**, and **proportionate** without creating unnecessary restrictions on learning.

The Chartered College of Teaching is offering a free certified assessment for school staff to evidence their understanding of artificial intelligence in education. To complete it, teachers and leaders first watch the DfE's guidance and training materials which cover safe, ethical and effective AI use in schools. They then complete an assessment to demonstrate their learning. This is a valuable CPD opportunity for staff developing informed, responsible approaches to AI in education.

Find more information here: https://chartered.college/safe-and-effective-use-of-ai-in-education/

More information can be found here:

Artificial Intelligence - DfE Guidance

Artificial Intelligence (AI)

- The school understands the safety considerations and legal responsibilities of using Generative AI. We use Generative AI different areas of teaching and learning and follow the guidance from Generative artificial intelligence (AI) in education - GOV.UK
- The schools use Google Gemini as its sole Generative AI model – the AI policy can be found on the school website
- The schools consider online safety, including AI, when creating and implementing their school or college approach to safeguarding and related policies and procedures
- The schools consult Keeping children safe in education
- The schools refer to our generative AI product safety expectations
- The schools refer to the filtering and monitoring standards to make sure they have the appropriate systems in place, including filtering and monitoring approaches that cover generative AI

All staff will be trained to:

- recognise and respond to incidents of image-based abuse (e.g. non-consensual sharing, manipulation or threats involving student imagery) with emphasis on prevention and safe practice.
- ensure any immediate safeguarding response prioritises the student's safety, dignity and emotional wellbeing.
- report any blackmail or threats involving imagery to the police as a criminal matter, alongside following internal safeguarding procedures.

Section 18: Online Safety

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

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse (KCSIE, 2026).

Online Safety – New risks (misinformation, disinformation, conspiracy theories)

Online safeguarding risks increasingly include exposure to **misinformation, disinformation and conspiracy theories**, which may undermine children's trust in adults, promote harmful ideologies, or increase their vulnerability to radicalisation. As part of our digital safeguarding education, pupils and students are taught to critically assess content, verify sources, and report unsafe material (KCSIE, 2026).

Online Safety Act – all staff are aware of recent changes.

Mandatory Age Verification on Pornographic Websites:

From 25th July 2025, all pornographic websites accessible in the UK must have effective age verification systems in place (such as ID checks or facial age estimation).

New Offences

Cyberflashing – illegal to send unsolicited sexual images intended to alarm or distress.

Epilepsy trolling – criminal to send flashing images aiming to trigger seizures or cause distress.

Threatening communications – sending threats of serious harm, death or violence is a standalone offence.

Encouraging serious self-harm – offence to promote or encourage self-harm online, even if harm doesn't occur.

Sharing intimate images (including deepfakes) – offence to share or threaten to share sexual images without consent, including AI-generated content. For more information please visit: AI CSAM Guides for Professionals | IWF & NCA.

Children are specifically taught about safe use of the internet. Our policy is not to block everything and only allow children access to certain sites – they need to be taught what is acceptable and what is unacceptable, and what to do when they feel 'uncomfortable'.

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, **some** pupils are able to access the internet on their own devices using their own data plan. To minimise inappropriate use, pupils are supervised and guided carefully when engaged in learning

activities involving online technology. Online safety education is embedded within the curriculum and pupils are taught how to use online technology safely and responsibly.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training all staff members will be made aware of the following:

- Pupil attitudes and behaviours which may indicate that they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

The school will ensure that the use of filtering and monitoring systems does not cause 'over blocking' which may lead to unreasonable restrictions as to what pupils can be taught regarding online teaching.

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material, including when they are online at home. Appropriate filters and appropriate monitoring systems should be in place. Where children are being asked to learn online at home, the Department for Education has provided advice to support schools and colleges to do so safely.

Please refer to: Safeguarding in schools, colleges and other providers (DfE, May 2020)
Safeguarding and remote education (DfE, March 2021, updated November 2022)
See: e-Safety Policy
See: Remote Virtual Learning Policy

Section 19: Mobile Phone Safety

See: Mobile Phone Policy

Section 20: Children with Special Educational Needs or Disabilities or certain health conditions

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect or exploitation in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

In our school we identify pupils who might need more support to be kept safe or to keep themselves safe. We do this in the following ways:

- Children will have a familiar adult to support with communication through simple language.
- Extra pastoral support is considered for children with SEN and disabilities.
- Use of visual aids and sign language to support understanding where required.
- Use of a familiar Speech and Language therapist to ensure that questioning and answers are put in a manner accessible to the child.
- Children are carefully monitored and observed to provide a full picture of their behaviour and mannerism so that any changes are noted, and a comparison can be made.
- The use of body maps, visuals and sign language are used to allow children to communicate their needs or concerns.
- The use of social stories is regularly used to support appropriate and inappropriate behaviour – such as bullying and keeping safe.
- Intervention groups teach children how to communicate and explain appropriate and inappropriate behaviour.

When required to use reasonable force to calm a situation, 'reasonable' means 'using no more force than is needed'. Individual plans for vulnerable children will be drawn up to reduce the use of force.
There are limited circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. The school follows the DfE guidance Use of reasonable force and other restrictive interventions guidance Please refer to the school's Use of Reasonable Force Policy –link relevant policy

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Inclusive Terminology – Autism

Update any instance of "Autism Spectrum Disorder" to:

Autism (removing the term "disorder" in line with inclusive language in SEND guidance and KCSIE 2026).

For further support and guidance:
https://suttoninformationhub.org.uk/pages/send-local-offer

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

See: Positive Behaviour Policy

Section 21: Recognition/Signs of Abuse

The first indication of concern about a pupil's welfare is not necessarily the presence of a serious injury. Many other signs, could be an indication of abuse, these may include:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn, or clingy, or they might have difficulty sleeping or start wetting the bed
- Children with clothes which are ill-fitting and/or dirty
- Children with consistently poor hygiene
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason
- Children who don't want to change clothes in front of others or participate in physical activities
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- Children who change friendships or have relationships with older individuals or groups
- Children who have a significant decline in performance
- Children who show signs of self-harm or a significant change in wellbeing
- Children who show signs of assault or unexplained injuries
- Children who have unexplained gifts or new possessions
- Children who talk about being left home alone, with inappropriate carers or with strangers
- Children who fail reach developmental milestones, such as learning to speak or walk, late, with no medical reason
- Children who are regularly missing from school or home
- Children who are missing from education
- Children who are reluctant to go home after school
- Children with poor school attendance and punctuality, or who are consistently late being picked up
- Parents who are dismissive and non-responsive to practitioners' concerns
- Parents who collect their children from school when drunk, or under the influence of drugs

- Children who drink alcohol regularly from an early age
- Children who are concerned for younger siblings without explaining why
- Children who talk about running away
- Children who shy away from being touched or flinch at sudden movements.

(Please note this is not an exhaustive list)

Section 22: Role of the Designated Safeguarding Lead

(See Appendix D for Designated Staff Details)
(See Annex C of KCSIE, 2026 for more information Annex C: Role of the designated safeguarding lead (keepingchildrensafeineducation.co.uk))

Our Designated Safeguarding Leads for children are **Mr L Hawkes (St Elphege's)** **and** **Mrs T Christoforou (Regina Coeli)**. The Designated Teacher for Children Looked After at St Elphege's is **Ms C Wright,** and **Mrs M Spain** at Regina Coeli. All deputy DSLs may deputise for the DT CLAs where necessary. Deputy Designated Safeguarding Leads who are available to provide safeguarding cover when DSLs are unavailable are **Mrs N Hawkes, Mrs S Michaels, Mrs C Wright, Mrs A Glanville, Mrs V Laffin, Mrs N Hutchinson, Ms P Narenthiran, Ms C Dall (St Elphege's)** **and**, **Mrs M Spain, Mrs J Mabey, Mrs M Goodridge, Mrs C Guilmartin-Cole, and Mrs Aylea Abassi (Regina Coeli)**. **Ms A Cunniffe is a Deputy Designated Person for St Elphege's and Regina Coeli Schools**.

The members of staff named above are responsible for child protection issues. Any member of staff concerned about a pupil/student should tell the Designated Safeguarding Lead or, in his/her absence, the other designated staff, immediately. If they are unavailable, a senior member of staff should be advised.
We also have a Nominated Governors for Child Protection, **Mrs A Glanville, Mr S Wadvani.** Our Chair of Governors is **Mr T Tamplin.**
Safeguarding is a standing item on all governing board meetings. The designated teacher and designated governor meet termly.
All DSLs should lead on the completion of the annual S175 audit and return all requested information to the LSCP within the given time frame. This is a working document and should be used to inform future action planning and development around safeguarding.
See Appendix D for Designated Staff Details)
(See Annex C of KCSIE, 2026 for more information - Keeping children safe in education 2026

The Designated Safeguarding Lead has a responsibility for Safeguarding and Child Protection – their key role is:

Manage referrals

The designated safeguarding lead (or deputies) will refer cases:

- of suspected abuse, neglect or exploitation to the local authority children's social care as required and support staff who make referrals to local authority children's social care.
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme.
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required.
- LSCP_Sutton_Threshold_Guidance_Oct_2022.pdf (suttonlscp.org.uk)
- CSCB-Thresholds-Guidance

How to make a quality referral for a concern about a Sutton Child

- How to make a quality referral for a concern about a Sutton child.

Although this guidance is for Sutton, the key principles of good practice should be used when referring to Croydon MASH

Working with others

The designated safeguarding lead (or deputies) will:

- act as a source of support, advice and expertise for all staff.
- act as a point of contact with the safeguarding partners.
- liaise with the Headteacher inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult.
- as required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member.
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement at school. This includes:
    - ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
    - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
    - From June 2021, the Virtual Headteacher has a responsibility to promote the education of children who have a social worker and regular conversations should be had to share the relevant information and to enable every opportunity for the child to reach their full potential.

Information sharing and managing the child protection file

The guidance is clear that information may be shared where there are safeguarding concerns. Whilst consent to share is not necessarily required, there must be a legal basis to share.

https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

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. Concerns and referrals will be kept in a separate child protection file for each child.
Records will include:

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

The file will only be accessed by those who need to see it.

Where children leave the school (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The child protection file will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.
In addition to the child protection file, the designated safeguarding lead will also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college.

Raising Awareness

The designated safeguarding lead (or deputies) will:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff.
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- ensure the child protection policy is available publicly and parents and carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. The designated safeguarding lead will undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care to safeguard and promote the welfare of children.
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners.
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college.
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online.
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Event List : Safeguarding (event-booking.org)

Sutton Local Safeguarding Children Partnership

Bitesize Safeguarding Training Videos and Accompanying Slides – Cognus

Commonly asked questions – Cognus

Child Safeguarding Toolkit

Fire Safety Toolkit

https://safetraining.lgfl.net/

https://sites.google.com/sutton.gov.uk/childprotectionconferences/home

Providing support to staff

Training will support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Additional support:

Reflective Safeguarding Supervision Offer – Cognus

https://www.educationsupport.org.uk/resources/for-individuals/videos/teaching-in-2023-how-to-manage-the-emotional-impact/

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The designated safeguarding lead will be equipped to:

- understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners.
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and

- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.
- The most important consideration is whether sharing information is likely to safeguard and protect a child. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner.

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

If the DSL or Deputy DSLs are not available, staff should speak to a member of the SLT/take advice from local children's social care and/or contact a member of the Education Safeguarding Team.

Section 23: The Role of Individual Staff & Governors

The Role of Individual Staff

The Teachers' Standards 2012 state that teachers (which includes Headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All school staff have a responsibility to provide a safe environment in which children can learn. All staff should be prepared to identify children who may benefit from early help.

All members of school staff should be aware of systems within the school which support safeguarding and these will be explained to them as part of staff induction. This includes: the school's child protection policy (including the policy and procedures to deal with child on child abuse); the behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying); staff behaviour policy (sometimes called a code of conduct); safeguarding response to children who go missing from education; and the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

All members of school staff will receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All members of school staff should be aware of their local early help process and understand their role in it.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and

section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

All staff should know what to do if a child tells them he/she is being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

The Role of Governors

The Governing Body has strategic leadership responsibility for the school's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must ensure that policies, procedures, and training in the school is effective and complies with the law.

The Governing Body will appoint a Safeguarding and Deputy to take leadership responsibility for their school's or college's safeguarding arrangements.

The Governing Body will ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Governing Body will do all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, the Governing Body should ensure the school has appropriate filters and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The Governing Body should consider the age range of the children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

Your governing board should make sure that:

The designated safeguarding lead (DSL) takes responsibility for understanding the filtering and monitoring systems and processes in place as part of their role (KCSIE 2026).
All staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training (KCSIE 2026).
Your school's child protection policy includes how your school approaches filtering and monitoring on school devices and school networks (KCSIE 2026).

Your board should also review the DfE's filtering and monitoring standards. It should discuss with IT staff and service providers what needs to be done to support your school in meeting the standards (KCSIE 2026).

For further information:
Bitesize Safeguarding Training Videos and Accompanying Slides – Cognus
Safeguarding for governors | LGFL

Section 24: Training

Induction training is mandatory and must also include:

- the Safeguarding and Child Protection policy and procedures;
- the Behaviour Policy;
- the Staff Code of Conduct;
- the safeguarding response to children who are absent from education, on repeat occasions and/or prolonged periods or where the absence is persistent or unexplainable.
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
- Online Safety (including Filtering and Monitoring).

All staff will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. All staff also receive training in data protection matters to ensure that they are kept up to date with their duties and obligations to protect information about the children in the school.

Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

A record is kept of staff training – type of training and dates which is recorded alongside the single central record (SCR).

The SCR should be checked regularly by a member of the Senior Leadership Team. Governors must also have assurance that these checks are regularly being carried out and can choose to assist in this process.

Free safeguarding training is available for all Croydon schools via the Learning & Development section of the CSCB website, and for Sutton Schools: Cognus - Safeguarding

Section 25: Confidentiality of Records

Our pupils and their parents/carers have the right to expect that all staff will deal sensitively and sympathetically with their situation. It is important that information is only available to those who need to know it. Parents/carers and where appropriate pupils should be told their right to confidentiality may be breached if information comes to light suggesting possible harm to a child. Safeguarding/Child Protection issues relating to individual cases **must not** be subject to open discussion in the staff room or elsewhere in the school.

All personally identifiable information will be kept securely, following the school's obligations under the latest Data Protection Act in England and the General Data Protection Regulations (GDPR) set down by the European Union.

Members of staff should also remember not to promise to pupils to keep "secrets" (*see procedure below*).

Section 26: Working with Children

We recognise that children who are abused, neglected, exploited, or who witness either of these things, may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will support pupils and enable them to feel safe through:

- the content of the curriculum;
- the school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued;
- the schools' Positive Behaviour Policy which is aimed at supporting vulnerable pupils in the school - the school will ensure the pupil knows that some behaviour is unacceptable, but they are valued and not blamed for any abuse which has occurred;
- liaison with other agencies that support the pupil such as social services, the child and adolescent mental health service, the borough school attendance service and the educational psychology service; and
- ensuring that, where a pupil with a child protection plan leaves the school, their information is transferred to any new school immediately and that the social worker is informed.

Section 27: Allegations involving School Staff/Supply/Agency/Volunteers

Allegations or concerns about a member of staff, worker or volunteer must immediately be notified to the Headteacher (or the Chair of Governors if the concern is about the Headteacher). This guidance should be followed where it is alleged that anyone working in the school including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The Headteacher (or Chair of Governors) will always consult the Designated Officers (in Sutton and Croydon, this person is still known as the Local Authority Designated Officer or LADO) within one working day (contactable in Sutton – 020 8770 4776 - and in Croydon - Jane Parr on 07716092630). The LADO will ensure any investigation is carried out, convene a Senior Strategy Meeting and involve other agencies as appropriate.

Following consultation, the Headteacher (or Chair of Governors) will decide on appropriate action, which may include consideration of disciplinary proceedings. It is important to bear in mind that although the concern may relate to an individual student, other students may also be at risk.

The school will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This should encourage an open and transparent culture; enable the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

Allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors

We recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the headteacher without delay; any concerns about the headteacher should go to the Chair of Governors who can be contacted through the school office.

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the headteacher. Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The headteacher has to decide whether the concern is an allegation or low level concern. The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see next page). In Sutton, the LADO requests that any concern that may be considered ‘low-level’ is consulted with the LADO to confirm this is the case. In Croydon, the process remains that this is at the headteacher’s discretion. However, if there is any doubt whatsoever, consultation with the LADO is best practice.

Out-of-school settings: safeguarding guidance for providers - GOV.UK

After-school clubs, community activities, and tuition - safeguarding guidance for providers

Unregistered independent schools and out-of-school settings - GOV.UK

Allegations
It is an allegation if the person* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'.
Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.
For Croydon schools - Reporting a concern about an adult who works with children
For Sutton schools – LSCP Local Authority Designated Officer (LADO) Protocol for Managing Allegations against Staff and Volunteers

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

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

Low-level Concerns
A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that isn't quite right.
Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
The last point includes behaviour that may have happened outside of school making them unsuitable to work with children. Known as *Transferable Risk*. Where appropriate an assessment

of transferable risk to children with whom the person works should be undertaken. **If in doubt seek advice from the local authority designated officer (LADO).**

If the Headteacher in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.
If the concern has been raised via a third party, the headteacher should collect as much evidence as possible by speaking:

- directly to the person who raised the concern unless it has been raised anonymously.
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.
Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)
Records must be kept confidential, held securely, and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.
Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised, or extra training delivered to minimise the risk of it happening again.
If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO. The LADO will always speak with head teachers on a consultancy basis to establish whether threshold has been met.
For this reason, where there is any question about whether threshold is met for a referral, a consultation with the LADO should be undertaken.
See also Developing and implementing a low-level concerns policy (Farrer & Co)

- The procedures in 'Keeping Children Safe in Education' (*DfE, September 2026*), 'Working Together to Safeguard Children' (*HM Government, December 2023*) and the Sutton Local Safeguarding Children Partnership procedures will be followed in all such cases.

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

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

Please also refer to the LADO Protocol:

Sutton Local Safeguarding Children Partnership - LSCP Protocols (suttonlscp.org.uk)

Section 28: Allegations against other children

- If an allegation of abuse is made against other children by children then this must be reported immediately, in accordance with this policy.
- This will then be reported to the Children's First Contact Service (CFCS) / Multi-Agency Safeguarding Hub (MASH) by a designated person or deputy designated person.
- Abuse or concerns about a risk of abuse or harm by other children/young people is subject to the same safeguarding procedures as in respect of children or young people being abused by an adult;
- Professionals responding should be alert to the risk a child/young person may pose to children/young people other than any 'current' victim; and
- Children or young people who harm others are likely to have considerable needs themselves (e.g. they may have been subjected to abuse, witnessed domestic violence or committed criminal offences).

Section 29: Whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team.

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
The NSPCC whistleblowing helpline is available as an alternative route for staff that do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school.

Staff can call 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or email: help@nspcc.org.uk.
See: Whistle Blowing Policy
For more information please visit:

DfE whistleblowing policy - GOV.UK
Blowing the whistle to the Department for Education - GOV.UK

Section 30: Foreign Exchange Visits (if applicable)

We will seek the consent of our host families to carry out checks with the appropriate Local Authority to ensure suitability.

In the event that a host family has been subject of some kind of concern, unless there is satisfactory resolution, the family will be regarded as unsuitable to receive or continue to host a student from overseas. We will take responsible steps to ensure that a comparable approach is taken with our or by our comparison schools abroad.

KCSIE 2026, Annex D explains in full the requirements for schools to follow their statutory duties regarding hosting and exchange visits.

Section 31: Hosting Exchange Visits

When the school is arranging for a visiting child/young person to be provided with care and accommodation in the UK in a home of a family to which the child/young person is not related, the responsible adults are considered to be in regulated activity for the period of the stay.

In such cases the school is the regulated activity provider; therefore, the school will obtain the necessary information required including a DBS with barred list information to inform its assessment of the suitability of responsible adults.

KCSIE 2026, Annex D explains in full the requirements for schools to follow their statutory duties regarding hosting and exchange visits.

(Please refer to KCSIE, 2026 for further information)

Section 32: 'Home-stays' in UK

If the school arranges the homestay, they should obtain an enhanced DBS for everyone in the home over 18 years old.

(Please refer to KCSIE, 2026 for further information)

Section 33: Alternative Provision / Trips Away from School

For all pupils and students placed in Alternative Provision (AP), the school must:

- Obtain **written confirmation** from the AP provider that all **safeguarding checks** have been completed.
- Provider must notify the school of any staff changes or risks.
- Keep accurate records of where the child is, including all sites attended.
- Review placements every half-term to ensure safety and suitability.
- Immediately review or end placements if safeguarding concerns arise.

These measures ensure that every child in offsite provision remains safe and receives an education aligned with their needs.

The school will remain responsible for a pupil's welfare during their time at an alternative provider.

(KCSIE, 2026).

See: Educational Visits Policy
See: Supplementary Materials 3

Section 34: Work Experience

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the schools host a work experience placement for a pupil under 18 years, the schools with work the child's host school on all matters in relation to safeguarding the guest pupil.

Section 35: Role of the Responsible Adult

Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputies) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code. PACE also states that: If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputies) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded in-line with school procedures.

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputies) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned[1] before questioned about an offence, or asked further questions[2] if their answers provide the grounds

for suspicion, or when put to them the suspect's answers or silence, (i.e., failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult' means, in the case of a child:

- the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
- a social worker of a local authority
- failing these, some other responsible adult aged 18 or over who is **not**:
    - police officer;
    - employed by the police;
    - under the direction or control of the chief officer of a police force; or
    - a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.

Further information can be found in the statutory guidance - PACE Code C 2019.

https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

[1]*The police caution is: "You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*
[2]*A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.*

Section 36: Child Protection Procedures

When a child discloses, or you are aware there is a safeguarding issue

DO NOT DELAY

- Tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a lesson to do this – do not leave notes in the Designated Safeguarding Lead's pigeon hole as they may not get back to check their post until the end of the day once the pupil has gone home.
- Early referral gives more time to offer help to the pupil and family before the situation becomes more serious;
- When the matter is already severe or serious, early referral gives more time for others to protect the pupil;
- The Designated Safeguarding Lead may consult the Children's First Contact Service (CFCS) / Single Point of Access (SPOC).

MAKE WRITTEN NOTES

- At the earliest opportunity make a written record of your concerns, using a child concern form, these can then be added to our online recording system (CPOMS)- record facts accurately and do not express opinion - these notes will help to ensure accuracy in recalling events later - notes should be legible, signed and dated/time.
- Do not take photographs of any physical injuries, record on a body map. Do not use audio to record disclosures.
- Any original notes must be given to the Designated Safeguarding Lead as soon as possible and kept, even if you are using the online system- CPOMS. Staff must report safeguarding concerns in person to the DSL or member of the safeguarding team. Staff should remember that CPOMS is a recording platform NOT a reporting platform.

In Summary

Receive – listen to what the student wants to tell you

Reassure – that they are believed, and their concern will be followed up

React – ask open questions and then speak to the DSL

Record – make a written record of the conversation and pass it to the DSL

Refer – via the DSL and using the local referral process

It is important to remember that students may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

Concern from something the child says

Listen - do not ask questions or interrogate. Consider interpreting services if English is a second language.
Remain calm - if you are shocked, upset or angry the pupil will sense this, and this could stop them from saying more.
Reassure - the pupil has done nothing wrong - tell them it is alright to talk.
Do not promise to keep it secret - tell the pupil you cannot keep the matter secret and will need to take advice from someone who can help.

Referral Process

Any member of staff can make a referral to the Children's First Contact Service (CFCS) / Multi-Agency Safeguarding Hub (MASH) or the Police, but they should always consult the Designated Safeguarding Lead wherever possible.

The designated staff may contact the Children's First Contact Service (CFCS) / Multi-Agency Safeguarding Hub (MASH) to make a referral or take advice or contact the child's social worker (if allocated.)

If staff are concerned that the child or family involved have been exposed to radicalisation or extremist behaviour, then they will make a Prevent referral. The referral form for Prevent can be found here:

Statutory Prevent Duty - Sutton Council

Croydon's Prevent Co-ordinator (Haydar Muntadhar: email haydar.muntadhar@croydon.gov.uk. tel. 0208 726 6000 (ext. 62070)

(Additional information is also available in the London Child Protection Procedures).

Remember

- If in doubt, consult;
- Do not ignore concerns, even if these are vague;
- The first responsibility of staff is to the pupil;
- If you need help or support to manage your own feelings, this can usually be provided.

Contact with the family

Contact with the family **should always** be discussed with the Designated Safeguarding Lead, who may consult the Children's First Contact Service (CFCS) / Single Point of Contact (SPOC) or the Education Safeguarding Team.

In cases where a minor physical injury causes concern, then the school's policy for dealing with accidents should be followed. If the explanation suggests a non-accidental cause for the injury (or a failure to protect the pupil from harm), advice must be taken immediately from the Children's First Contact Service (CFCS) / Single Point of Contact (SPOC).

In cases of possible neglect or emotional abuse, the concern may have built up over a period of time. There may have been discussion previously between school staff and the family about sources of help, but if concerns persist, the Designated Safeguarding Lead will need to refer to the Children's First Contact Service and will normally advise the family of this unless specifically told otherwise.

In cases where there are suspicions of sexual abuse or physical chastisement, the Designated Safeguarding Lead will unpick with the child first and then seek immediate advice from the Children's First Contact Service or the Croydon MASH Team before discussing this with the family.
For reference - a flow chart on how to manage disclosures of Physical Chastisement is now included in Sutton's Threshold Guidance.

Recording

- Where there are concerns about a pupil, our electronic files have an appropriate flag to indicate concern;
- All records relating to child welfare concerns will be kept on the pupil's child protection file and the file will be kept secure - a chronology of concern will be kept by the designated teacher;
- Written records of any concerns about pupils are kept, even where there is no need to refer the matter immediately;
- Information from records will only be accessed on a "need to know" basis; access is strictly controlled by the designated teacher.
- Key staff will need to know when a pupil is subject to a Child Protection Plan, so they can monitor the pupil's welfare;
- Records relating to the pupil's welfare will remain on the pupil's file as long as the pupil is a pupil at the school;
- When the pupil leaves the school, the new school will be informed that the school's records contain information about child protection concerns even where these are no longer current. Records should be sent to the new school in a way that is lawful in terms of data protection requirements.
- Records will be kept until the child is 18 years old by primary schools and 25 years old for secondary schools.

Working with other agencies

- All school staff have a legal duty to assist local authority Children ‘s Social Care or the Police when they are making enquiries about the welfare of pupils;
- Information about a pupil must therefore be shared on a "need to know" basis with other agencies;
- When telephone requests for information are received, ***always*** maintain security by checking the telephone number listing for the caller and calling back to a switchboard number ***before*** giving information or confirming the pupil is on the school roll;
- Always advise the designated teacher about such requests for information;
- Requests for attendance at meetings about individual pupils (e.g. child protection conferences) should be notified to the designated teacher, who will arrange preparation of a report and attendance at the meeting;
- Reports should contain information about the child's:
    - academic progress
    - attendance
    - behaviour
    - relationships with children and adults
    - family
    - any other relevant matter;
- Reports should be objective, distinguishing between fact, observation, allegation and opinion;
- Unless you specify otherwise, reports will normally be made available to the pupil’s family.

Pupils subject to a Child Protection Plan

- The school will be told by the relevant local authority when a pupil is subject to a Child Protection Plan;
- The name of the key social worker must be clearly recorded on the pupil’s record;
- The school will participate fully in the work of Core Groups for these pupils, to assist with the objectives of the Child Protection Plan for the pupil;
- When a pupil is subject to a Child Protection Plan, the school will report all unexplained absences even if only of a day;
- When a pupil is subject to a Child Protection Plan, the school will report all behavioural changes or other concerns to the key social worker; and
- When a pupil who is subject to a Child Protection Plan leaves the school, all the child protection information will be transferred to any new school.

Child's need for a social worker

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

All staff must observe the above policy and procedure at all times. They will be reviewed annually and as required in line with changes in local (LSCP) or national guidance.

Section 37: Definitions of Specific Safeguarding Issues

DEFINITIONS OF SPECIFIC SAFEGUARDING ISSUES

Body Confidence and Self-Esteem

Promoting positive body image and self-esteem is crucial for safeguarding children's wellbeing, as it can help prevent negative mental health outcomes like depression and eating disorders. By fostering a culture of self-acceptance and resilience, children can develop a healthy relationship with their bodies and build confidence in their overall self.

For more information please visit:

Home - SEED | Eating Disorders Support Service %

Bullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the four main types of bullying are: physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling), social (e.g. isolating an individual from the activities, lying and spreading rumours, damaging someone's reputation and carrying out acts behind a person's back to cause humiliation) and cyber (e.g. sending abusive or hurtful texts, emails, posts, images or videos, deliberately excluding others online, spreading gossip or rumours and imitating others online or using their log-in details).

Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: **www.actionagainstabduction.org/** and **www.clevernevergoes.org**.

Children who are lesbian, gay or bisexual

A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.
The schools' Anti-bullying Policy outlines how we address vulnerabilities such as the risk of bullying and take steps to prevent it, and sanctions we have in place.

Children who are questioning their gender

The schools will not initiate any action in this area. Where a child or their parent has raised a request relating to social transition, the school will follow the guidance outlined in Paragraph 252-282 of Keeping Children Safe in Education 2026.

Parents and carers have the leading role in the lives of their children, and this area is no exception. Therefore, where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority and treat their views with importance. Staff will not adopt any changes relating to social transition unless a decision has been made by the school and the child's parents/carers have been involved. However, in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the designated safeguarding lead will determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

In cases where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, staff do not need to break any confidence unless there is a related safeguarding risk. The school will follow usual procedures where a conversation with a child raises concerns about the child's wellbeing or safety, including involving parents or carers where appropriate.

As a school, we have a statutory duty to safeguard and promote the welfare of all children. We will consider how best to fulfil that duty towards a child who is questioning their gender, as well as their peers, ensuring that any agreed course of action takes account of the impact on all of those affected. This means that the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes.

In the vast majority of cases, the school will work with parents or carers to determine what is in the best interests of the child and will consider any clinical evidence or advice and seek any additional non-clinical professional advice where relevant (for example from the SENCO), including involving the designated safeguarding lead. The school will consider everything that could be affecting a child, including whether they have any wider health issues or neurodiversity.

As infant and junior schools, we will exercise particular caution; support for full social transition will be agreed very rarely. This is due to the recommendations and findings in the Cass Review. See sect. 271 of Keeping Children Safe in Education. The school is particularly conscious of safeguarding concerns relating to primary aged children. For example, the Cass Review noted evidence that children who socially transition before puberty – and those who transition prior to receiving clinical advice – are more likely to proceed to a medical pathway than those who do not. We recognise that some children who socially transition before puberty will be "living in stealth" meaning other pupils and/or staff may be unaware of their biological sex.

Living in stealth

The school is particularly conscious of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth (that is, school friends/staff may be unaware of their biological sex). The Cass Review emphasised that these children are likely to approach puberty in a fearful and anxious state.

Actions: The school will involve the designated safeguarding lead in these cases.

Obligations under the Equality Act and Human Rights Act

As well as complying with safeguarding obligations as above, the school must also comply with the duties under the Equality Act 2010 and the Human Rights Act 1998. In line with the responsibilities of schools to adhere to the highest standards of safeguarding for the children and young people in their care, alongside obligations under the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, the school will not allow pupils into toilets, changing rooms, or boarding or residential accommodation designated for the opposite sex, with no exceptions. Similarly, where we have implemented single-sex sports as being necessary for safety reasons, there will be no exceptions and pupils will not be allowed to participate in sports designated for the opposite sex.

When changing for sport or PE sessions, children over the age of 11 years will change in rooms designated to their biological sex, where this is an issue, individual arrangements will be made (KCSIE 26).

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts, or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- Appear with unexplained gifts, money or new possessions;
- Associate with other children involved in exploitation;
- Suffer from changes in emotional well-being;
- Misuse alcohol and other drugs;
- Go missing for periods of time or regularly come home late; and

- Regularly miss school or education or do not take part in education.

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

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- Have older boyfriends or girlfriends; and

- Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

- **For more information please visit:**

- **Child Exploitation Awareness Microsite**
- Child Exploitation Awareness
-
- Moving money | The Children's Society

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

- Go missing and are subsequently found in areas away from their home;

- Have been the victim or perpetrator of serious violence (e.g. knife crime);

- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;

- Are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;

- Are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;

- Owe a ‘debt bond’ to their exploiters;

- Have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the **Home Office and The Children’s Society County Lines Toolkit For Professionals**

Evaluation of the County Lines Programme - GOV.UK

Dangerous Dogs

The benefits of owning pets are well established. Having a pet can have physical and emotional benefits for a child as well as teaching them about responsibility and caring for living creatures. However, in recent years a number of children and adults have been seriously injured or have died from attacks by dogs, and it is important therefore that professionals working with children and families are aware of the issues around dangerous dogs and the risks they can pose to children and young people.

For more information please visit:

PG11. Dangerous Dogs and Safeguarding Children

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: **Mandatory reporting of female genital mutilation procedural information**.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or a deputy) and involve local authority children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual

evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: **FGM Fact Sheet**.

Further information can be found in the **Multi-agency statutory guidance on female genital mutilation** and the **FGM resource pack** particularly section 13.

Please click here to access Sutton's FGM resources:

Sutton Local Safeguarding Children Partnership - LSCP Policy & Practice (suttonlscp.org.uk)

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Radicalisation and Extremism

Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism [147] is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation [148] refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism [149] 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.

[147] As defined in the Government's Counter Extremism Strategy www.gov.uk/government/publications/counter-extremism-strategy.
[148] As defined in the Government's Prevent Duty Guidance for England and Wales. www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales
[149] As defined in the Terrorism Act 2000 (TACT 2000) www.legislation.gov.uk/ukpga/2000/11/contents

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect people from extremist ideologies and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

Actions:
As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection, and share these concerns with the DSL. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately.
Phone 999 or the Anti-Terrorism hotline on 0800 789 321 immediately if you think a pupil:

- Is about to put themselves or others in immediate danger
- Appears to be involved in planning to carry out a criminal offence

Actions for the DSL:

- If you have a non-urgent concern about terrorism, email: prevent@sutton.gov.uk
- Follow Sutton Preventing terrorism and radicalisation 2026 roadmap
- If your concerns fall into the 'medium' risk outlined in Managing risk of radicalisation in your education setting - GOV.UK or if you have any doubts, **you should make a prevent referral immediately:** National Prevent referral form
- If your concerns fall into the 'high' risk category, you should contact the police immediately.

Making a referral to Prevent - GOV.UK
Statutory Prevent Duty | London Borough of Sutton
The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK
Educate Against Hate - Prevent Radicalisation & Extremism
Online Safety – ACT Early

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard [150] to the need to prevent people from being drawn into terrorism". [151] This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised **Prevent duty guidance: for England and Wales**, especially **paragraphs 57-76**, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads (and deputies) and other senior leaders in colleges should familiar themselves with the **Prevent duty guidance: for further education institutions in England and Wales**. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

[150] According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.
[151] "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

All staff will undertake Prevent awareness training.
To note:

Martyn's Law and Protective Security

Martyn's Law – formally the Terrorism (Protection of Premises) Act 2025 – is named in memory of Martyn Hett, one of the 22 people killed in the 2017 Manchester Arena bombing. The law introduces new duties to help reduce harm from terrorist attacks. All UK schools, including early years, primary, secondary and further education, are classed as 'standard tier' premises and have two years to prepare before enforcement begins in 2027.

For more information please visit:

Martyn's Law Factsheet – Home Office in the media

Further resources:
Educate Against Hate - Prevent Radicalisation & Extremism
The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)
Prevent duty self-assessment tool for schools - GOV.UK (www.gov.uk)
Prevent duty training - GOV.UK (www.gov.uk)
Prevent duty guidance - GOV.UK (www.gov.uk)

What Prevent is and how to respond

https://youtu.be/XnLOAVF5Nm8?feature=shared

More information can be found here including the Sutton Prevent Roadmap:

Commonly asked questions – Cognus

Child on child Abuse

Staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse/harm. This is most likely to include, but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- 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).
- 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).
- 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.
- For more information around consent please visit: Talk Consent • Specialist Consent Education for Schools
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as making or sharing of nudes and semi-nudes).
- up skirting, 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; and
- 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).

Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Child on child abuse/harm can be a one-off serious incident or an accumulation of incidents. It can involve physical, emotional or sexual abuse. Child on child abuse/harm involves someone who abuses a 'vulnerability' or power imbalance to harm another and have the opportunity or

be in an environment where this is possible. While perpetrators of peer-on-peer abuse/harm pose a risk to others, they are often victims of abuse themselves.

We recognise that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.

We recognise that it is more likely that girls will be victims and boys' perpetrators, but that all peer-on-peer abuse is unacceptable and will be taken seriously

Procedures for minimising the risk of Child-on-Child abuse

The schools have has drawn up an action plan to respond to the recent Ofsted report on sexual abuse in schools and colleges. This and a range of other safeguarding matters form part of the School Improvement and Development Plan.

1. Regular training for all staff and governors in identifying suspected or actual instances of child-on-child abuse.

2. PHSE, RSE and Computing Curriculum used to educate pupils about harmful or unacceptable behaviours and what they should do if they are victim or perpetrator of such. The Curricula create a culture of transparency and openness where all feel comfortable to speak out about harmful behaviours.

3. Identified cases of child-on-child abuse will be reported, recorded and analysed using existing child protection procedures.

4. Internal or external support (as appropriate) will be provided to both the victim and the perpetrator.

KCSIE 2026 Part 5 and the separate guidance 'Sexual violence and sexual harassment between children in schools and colleges' sets out how schools and colleges should respond to reports of sexual violence and sexual harassment.

Upskirting Voyeurism (Offences) Act 2019

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12th April 2019. Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Private Fostering

The phrase 'private fostering' is often misunderstood. There is local authority fostering and fostering by private agencies. However, in law 'Private Fostering' is quite different.

From a safeguarding perspective, many private fostering arrangements are 'hidden' and, it appears, are rarely brought to the attention of local authorities, even though it is an offence not to inform them. The penalty for non-reporting is a maximum £5,000 fine, but it seems that convictions are extremely rare.

What is Private Fostering?

A private fostering arrangement is one that is made privately (without the involvement of a local authority (or a private sector agency)) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins).

The local authority should be notified of the arrangement, at least six weeks before it starts and not to do so is a criminal offence.

Once the local authority has been notified, children's services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carers household. Children's services will then undertake a range of suitability checks including DBS checks on everyone in the household over the age of 16.

Sutton Local Safeguarding Children Partnership - Private Fostering (suttonlscp.org.uk)

Overseas Students

If an overseas student under the age of 16 (or under 18 if disabled) stays with a host for 28 days or more, there is a legal requirement for the host, guardianship agency, language school, agent, or other person or company involved in placing the student, to inform their local authority.

Breast Ironing

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

Consent

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.
Consent can be withdrawn at any time during sexual activity and each time activity occurs
• a child under the age of 13 can never consent to any sexual activity
• the age of consent is 16
• Sexual intercourse without consent is Rape

For more information please visit:

Talk Consent • Specialist Consent Education for Schools

Disguised Compliance

Parents who appear to cooperate to avoid professionals getting too close or asking too many questions. There is a tendency by professionals to confuse participation with cooperation. Indicators include parents that put little effort into making changes, limited improvement despite significant input, conflicting views of child and parent, parents align with certain professionals and only engage with part of the plan. The risks of disguised compliance are that cases may drift and lack focus, significant issues may be missed, risks may increase, cases may be closed too early and the child remains at risk of harm. It is important to keep an open mind, use an investigative approach and effective questioning. As professionals we must look beyond the obvious.

Hidden Children

Children who do not attend school can become hidden, which means that we are less able to help and protect them. Some of these children may experience risks within their family, such as abuse, neglect or exploitation. There may also be risks outside their family, such as radicalisation or exploitation. Protecting children from these external risks is known as contextual safeguarding. Children who do not attend school may be at further risk of not achieving their educational potential. They may not be able to access formal education or employment in the future if they have not gained recognised qualifications. They will also not benefit from the role that schools play in developing children's skills to participate fully and constructively in society.

So which children are we talking about?

1. 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.
2. Children who fall under the heading 'educated at home', but may not be receiving effective, efficient and suitable education or any education. This includes some children who may not be known to their local authority (LA) or any agencies.
3. Children attending unregistered schools, sometimes under the guise of being electively home educated.
4. Children in alternative provision that is of insufficient quality or is not provided for the required hours.
5. Children without a school place in LAs in which the protocols are not working well enough for hard-to-place children.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children **5-11-year olds** and **12-17 year olds**.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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

Children with family members in prison

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

Children who are absent from education

All staff should be aware that children being absent from school or college , particularly repeatedly and/or for prolonged periods, and children missing education, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures.

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

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

Local domestic abuse services - sutton.gov.uk

Sutton DASS - Cranstoun

Not Alone in Sutton

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

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

- **NSPCC - UK domestic-abuse Signs Symptoms Effects**;
- **Refuge what is domestic violence/effects of domestic violence on children**;

- **Safe Young Lives: Young people and domestic abuse | Safelives**;

- **Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk)** (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse);

- **Home: Operation Encompass** (includes information for schools on the impact of domestic abuse on children).

Operation Encompass:

In May 2024, the Victims and Prisoner's Act received Royal Assent. This places a statutory duty on all police forces in England and Wales to participate in Operation Encompass.

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

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

Operation Encompass is currently under review in Sutton.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:
Transform Sutton - 020 8092 7569 / transformsutton@cranstoun.org.uk

Not Alone in Sutton

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- **Home: Operation Encompass** (includes information for schools on the impact of domestic abuse on children).

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: **Homeless Reduction Act Factsheets**. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: **here**.

Fabricated or Induced Illness

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

Adverse Childhood Experiences (ACEs)

1 in 3 diagnosed mental health conditions in adulthood are directly related to adverse childhood experiences. ACEs can include maltreatment, violence and coercion, adjustment, prejudice, family adversity, inhumane treatment, adult responsibilities and bereavement and survivorship. If you have witnessed or experienced any of the following before the age of 18 you have suffered an adverse childhood experience: domestic violence, sexual abuse, alcohol abuse, physical abuse, parental separation, drug abuse, verbal abuse, mental ill-health or imprisonment.

Protective factors:

1. Positive and supportive family
2. Safe relationships with peers
3. Access to a supportive community
4. Ability to regulate emotions
5. Acquisition of problem-solving skills
6. Compassionate, professional response
7. Early intervention from services
8. Trauma-informed systems

When talking to someone who has suffered an ACE, don't ask, what is wrong with you? But, what has happened to you?

Trauma and Attachment

A significant number of children are exposed to traumatic life events. A traumatic event is one that threatens injury, death, or the physical integrity of self or others and also causes fear, terror, or helplessness at the time it occurs. Traumatic events include sexual abuse, physical abuse, domestic violence, community and school violence, medical trauma, car accidents, acts of terrorism, war experiences, natural and human-made disasters, suicides, and other traumatic losses.

If a child has experienced trauma they are likely to develop other related behaviours.

These include:

1. the development of new fears
2. separation anxiety (particularly in young children)
3. sleep disturbance, nightmares
4. sadness
5. loss of interest in normal activities
6. reduced concentration
7. decline in schoolwork
8. anger
9. somatic complaints
10. Irritability

Contextual Safeguarding

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Therefore, children's social care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

To access Sutton's NEET Protocol, please click on the link below:

Sutton Local Safeguarding Children Partnership - LSCP Protocols (suttonlscp.org.uk)

For further information:

Contextual Safeguarding Research Durham University

Serious Violent Crime

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- Increased absence from school;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;

- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- Being male;
- Having been frequently absent or permanently excluded from school;
- Having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office's **Serious Violence Strategy**.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's **Criminal exploitation of children and vulnerable adults: county lines** guidance. The **Youth Endowment Fund (YEF) Toolkit** sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found **here**. As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.

The Police, Crime, Sentencing and Courts Act will introduce early in 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual

violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Allegations of sexual violence and sexual harassment will be taken seriously

For more information and support please visit:

Lucy Faithfull Foundation - Preventing child sexual abuse

Home - Shore

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance: **Modern slavery: how to identify and support victims - GOV.UK**.

Child Trafficking Definitions

Cyber Crime

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

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

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or

being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note 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.

Additional advice can be found at: **Cyber Choices**, and **National Cyber Security Centre - NCSC.GOV.UK**.

Online Safety – New risks (misinformation, disinformation, conspiracy)

KCSIE 2026 now treats **misinformation**, **disinformation** (including fake news), and **conspiracy theories** as formal categories of **safeguarding risks** under Online Safety.

Generally accepted definitions:

- **Misinformation**: false/inaccurate information spread without intent to deceive.
- **Disinformation**: false/misleading information spread deliberately to deceive.
- **Conspiracy theories**: speculative narratives asserting secret plots by powerful groups without credible evidence.

Urban Exploring

Urban exploring, also known as urbex, is the exploration of man-made structures, particularly abandoned or derelict ones, often with a focus on photography and historical documentation. It involves venturing into places that are typically off-limits, sometimes requiring trespassing. While it can be a thrill and a way to explore, it is important to be aware of the potential risks, including safety hazards and legal consequences.

(Please refer to Annex B of KCSIE, 2026 for further information and links to resources and support).

Children who run away/go missing

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

Running away may be an indicator of other problems and therefore referral to SPOC / CFCS should be considered. Early intervention after the first episode may prevent a child being exploited. Children who run away or go missing from home or care

Contextual Safeguarding

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Therefore, children's social care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

LSCP_Protocol_Safeguarding_Adolescents.pdf (suttonlscp.org.uk)
9b. Contextual Safeguarding Briefing.pdf (suttonlscp.org.uk)

Section 38: Mental Health Definitions

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils. 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. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems (KCSIE, 2026).

Anxiety

Anxiety problems can significantly affect a child's ability to develop, to learn or to maintain and sustain friendships.

Children and young people may feel anxious for several reasons – for example because of worries about things that are happening at home or at school, or because of a traumatic event. Symptoms of anxiety include feeling fearful or panicky, breathless, tense, fidgety, sick, irritable, tearful or having difficulty sleeping. If they become persistent or exaggerated, then specialist help, and support will be required.

Clinical professionals refer to several diagnostic categories:

- Generalised anxiety disorder (GAD) – a long-term condition which causes people to feel anxious about a wide range of situations and issues, rather than one specific event;
- Panic disorder – a condition in which people have recurring and regular panic attacks, often for no obvious reason;
- Obsessive-Compulsive Disorder (OCD) – a mental health condition where a person has obsessive thoughts (unwanted, unpleasant thoughts, images or urges that repeatedly enter their mind, causing them anxiety) and compulsions (repetitive behaviour or mental acts that they feel they must carry out to try to prevent an obsession coming true);
- Specific phobias – the excessive fear of an object or a situation, to the extent that it causes an anxious response, such as panic attack;
- Separation Anxiety Disorder (SAD) – worry about being away from home or about being far away from parents/carers, at a level that is much more than normal for the child's age;
- Social Phobia – intense fear of social or performance situations;
- Agoraphobia – a fear of being in situations where escape might be difficult, or help wouldn't be available if things go wrong.

Depression

Feeling low or sad is a common feeling for children and adults, and a normal reaction to experiences that are stressful or upsetting. When these feelings dominate and interfere with a person's life, it can become an illness.

Depression can significantly affect a child's ability to develop, to learn or to maintain and sustain friendships.

Clinicians making a diagnosis of depression will generally use the categories major depressive disorder (MDD – where the person will show a number of depressive symptoms to the extent that they impair work, social or personal functioning) or dysthymic disorder (DD – less severe than MDD, but characterised by a daily depressed mood for at least two years).

Hyperkinetic Disorders

(e.g. disturbance of activity and attention)

Although many children are inattentive, easily distracted or impulsive, in some children these behaviours are exaggerated and persistent, compared with other children of a similar age and stage of development. When these behaviours interfere with a child's family and social functioning and with progress at school, they become a matter for professional concern.

Attention Deficit Hyperactivity Disorder (ADHD) is a diagnosis used by clinicians. It involves three characteristic types of behaviour – inattention, hyperactivity and impulsivity. Whereas some children show signs of all three types of behaviour (this is called 'combined type' ADHD), other children diagnosed show signs only of inattention or hyperactivity/impulsiveness.

Hyperkinetic disorder is another diagnosis used by clinicians. It is a more restrictive diagnosis but is broadly like severe combined type ADHD, in that signs of inattention, hyperactivity and impulsiveness must all be present. These core symptoms must also have been present before the age of seven and must be evident in two or more settings.

Attachment disorders

Attachment is the affectionate bond children have with special people in their lives that lead them to feel pleasure when they interact with them and be comforted by their nearness during times of stress. Researchers generally agree that there are four main factors that influence attachment security: opportunity to establish a close relationship with a primary caregiver; the quality of caregiving; the child's characteristics; and the family context. Secure attachment is an important protective factor for mental health later in childhood, while attachment insecurity is widely recognised as a risk factor for the development of behaviour problems.

Eating disorders

The most common eating disorders are anorexia nervosa and bulimia nervosa. Eating disorders can emerge when worries about weight begin to dominate a person's life. Someone with anorexia nervosa worries persistently about being fat and eats very little. They lose a lot of weight and if female, their periods may stop. Someone with bulimia nervosa also worries persistently about weight. They alternate between eating very little, and then binging. They vomit or take laxatives to control their weight. Both eating disorders affect girls and boys but are more common in girls.

Deliberate self-harm

Self-harm is a serious public health problem and is the reason behind many admissions to accident and emergency departments every year. Self-harm and suicidal threats by a child/young person put them at risk of significant harm and should always be taken seriously and responded to without delay.

Common examples of deliberate self-harm include 'overdosing' (self-poisoning), hitting, cutting or burning oneself, pulling hair or picking skin, or self-strangulation. The clinical definition includes attempted suicide, though some argue that self-harm only includes actions which are not intended to be fatal. It can be a coping mechanism, a way of inflicting punishment on oneself and a way of validating the self or influencing others.

Self-harming is NOT attention seeking behaviour, it is attention NEEDING behaviour.

St Elphege's will follow the Sutton Self-Harm protocol in responding to concerns about self-harm Sutton Local Safeguarding Children Partnership - LSCP Protocols (suttonlscp.org.uk)
Regina Coeli will follow the Croydon Threshold document and advice for professionals
Croydon Safeguardinglcsb

Specific staff receive suicide prevention training from the following accredited organisations:

- Free online suicide awareness training from the Zero Suicide Alliance

As part of our RSHE curriculum, we address suicide prevention indirectly and in an age-appropriate way. The curriculum includes recognising and talking about emotions, looking after one's own and others' wellbeing, being worried about friendships, other relationships, and judging whether feelings or behaviour require support. Teachers discuss isolation, loneliness and bullying, and how to cope when things go wrong in life and ensure pupils understand how to seek help from a trusted adult, including when they are concerned about another person. This is in line with the guidance from p.25, sect. 43 of

statutory Relationships Education, Relationships and Sex Education and Health Education guidance Details of the school's approach can be found in our RSE policy.

Self-harm is defined as when somebody intentionally damages or injures their body. It's usually a way of coping with or expressing overwhelming emotional distress. However, the intention is more often to punish themselves, express their distress, or relieve unbearable tension. Sometimes the reason is a mixture of both. Self-harm can also be a cry for help and some individuals may go on to complete a suicide attempt. Although some people who self-harm are at a high risk of suicide, many people who self-harm don't want to end their lives. In fact, self-harm may help them cope with emotional distress, so they don't feel the need to kill themselves.

Suicidal ideation or suicidal thoughts are when somebody feels like they want to die. Suicidal thoughts or an overwhelming desire to complete suicide usually happens during episodes of low mood or depression. Suicidal ideation is usually not followed by actions to complete suicide.
Suicidal intent is when somebody wants to die and has a plan to complete suicide. Suicidal intent must always be considered as high risk. Call 999 or take the child to A&E immediately.

Actions:

If staff feel that a child is in danger, they should call 999 or take them to A&E immediately.

If a child needs help urgently for their mental health, but it is **not** an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option or contact:

Sutton SPA Crisis Line : 020 3513 3800 (Mon-Fri, 9am-5pm) or 0203 228 5980 (out of hours)

Actions for the DSL:

- DSLs must follow the *Sutton LSCP Management of Young People Who Self Harm or Have Suicidal Ideation* protocol, available here: Sutton Local Safeguarding Children Partnership - LSCP Protocols
- To identify and respond to suspected self-harm or suicide clusters, the DSL will follow:
- 2025 Sutton Suicide Cluster Response Plan.pdf
- Cluster Response Plan Infographic.pdf

Post-traumatic stress

If a child experiences or witnesses something deeply shocking or disturbing they may have a traumatic stress reaction. This is a normal way of dealing with shocking events and it may affect the way the child thinks, feels and behaves. If these symptoms and behaviours persist, and the child is unable to come to terms with what has happened, then clinicians may make a diagnosis of post-traumatic stress disorder (PTSD).

Appendix C

Section 39: Sexual violence and sexual harassment

The school will follow the guidance in ‘Keeping Children Safe in Education’ (DfE, September 2026): **Responding to reports of sexual violence and sexual harassment**.

KCSIE 2026 Part 5 and the separate guidance 'Sexual violence and sexual harassment between children in schools and colleges' sets out how schools and colleges should respond to reports of sexual violence and sexual harassment.

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important to note that Children with Special Educational Needs and Disabilities can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers.

It is important that all victims are taken seriously and offered appropriate support.

All school staff should be aware that students 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, they may feel embarrassed, humiliated, or 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 DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

All school staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.
Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating

a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. Toolkits that will support the risk assessment process include: Brook: traffic light tool.

The designated safeguarding lead (or deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

Support available if a child has been harmed, or is in immediate danger or at risk of harm

If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to the Children's First Contact Service.

Support available if early help, section 17 and/or section 47 statutory assessments are appropriate

If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

Support available if a crime may have been committed

Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to the Children's First Contact Service (CFCS) / Multi-Agency Safeguarding Hub (MASH). The DSL will be aware of the local process for referrals to both the Children's First Contact Service (CFCS) / Multi-Agency Safeguarding Hub (MASH) and the police.
Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.

The school has a close relationship with the local police force and the DSL will liaise closely with the local police presence.

Support available if reports include online behaviour

Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.
If the incident involves sexual images or videos held online, the Internet Watch Foundation will be consulted to have the material removed.

Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

Managing disclosures

Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.
If a friend of a victim makes a report or a member of staff overhears a conversation, staff will act – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSCS where necessary. If staff are in any doubt, they will speak to the DSL.

Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same.
All staff will be trained to handle disclosures.

The DSL will be informed of any allegations of abuse against pupils with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the pupil in mind at all times.

Confidentiality

The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.

The DSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk.
- If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to the Children's First Contact Service.
- Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.
- The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

Anonymity

There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.
When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

Risk assessment

The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

Risk assessments will consider:

- The victim.
- The alleged perpetrator.
- Other children at the school, especially any actions that are appropriate to protect them.
- Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's **Data Protection Policy**.

Acting following a disclosure

The DSL or a deputy will decide the school's initial response, taking into consideration:

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the children involved.
- Any power imbalance between the children.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
- The best interests of the child.

Sexual violence and sexual harassment are always unacceptable and will not be tolerated. Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.

For reports of rape and assault by penetration, whilst the school establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises and on

transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.

For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.

In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

Managing the report

The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

There are four likely outcomes when managing reports of sexual violence or sexual harassment:

- Managing internally
- Providing early help
- Referring to CSCS
- Reporting to the police

Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.

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.

Managing internally

In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

Providing Early Help

The school may decide that statutory interventions are not required, but that pupils may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Harmful sexual behaviour framework: an evidence-informed operational framework for children and young people displaying harmful sexual behaviours (suttonlscp.org.uk)

Croydon's response to sexual abuse in schools Education Toolkit | Croydon Safeguarding

Referral to CFCS / MASH

If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to the Children's First Contact Service (CFCS) / Multi Agency Safeguarding Hub- MASH. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with the Children's First Contact Service (CFCS) / Single Point of Contact (SPOC).

The school will not wait for the outcome of an investigation before protecting the victim and other children.

The DSL will work closely with the Children's First Contact Service (CFCS) / MASH Team to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.
If the Children's First Contact Service (CFCS) / MASH Team decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.

If the school agrees with the decision made by the Children's First Contact Service (CFCS) / MASH Team they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

Reporting to the police

Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to the Children's First Contact Service (CFCS) / Single Point of Contact (SPOC). The DSL and deputies will follow the local process for referral.
Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with the Children's First Contact Service (CFCS) / Single Point of Contact (SPOC) and any appropriate specialist agencies.

The DSL and **local governing board** will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.

The DSL will be aware of local arrangements and specialist units that investigate child abuse.

In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

Bail conditions

Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.

The school will work with the Children's First Contact Service (CFCS) and the police to support the victim, alleged perpetrator and other children (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.

The term 'released under investigation' (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail.

Where bail is deemed necessary, the school will work with the Children's First Contact Service (CFCS) and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education.

Managing delays in the criminal justice system

The school will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made.

The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The end of the criminal process

Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable.

The school will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).
Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the school will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support.

The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

Ongoing support for the victim

Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- The terminology the school uses to describe the victim
- The age and developmental stage of the victim
- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like
- Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.

The school will provide a physical space for victims to withdraw to.

Victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies.

Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.

If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents.
If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

Ongoing support for the alleged perpetrator

When considering the support required for an alleged perpetrator, the school will consider:

- The terminology they use to describe the alleged perpetrator or perpetrator.
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
- Their age and developmental stage.
- What a proportionate response looks like.
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.
- When making a decision, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.

If the alleged perpetrator moves to another school (for any reason), the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.

The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

Disciplining the alleged perpetrator

Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.

The school will make such decisions on a case-by-case basis, with the DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.

The school will also consider whether circumstances make it unreasonable or irrational for the school to decide about what happened while an investigation is considering the same facts.

Disciplinary action and support can take place at the same time.

The school will be clear whether action taken is disciplinary, supportive or both.

Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of the pupil will always come first.

Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other pupils.

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made. Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected, and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents and carers

In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.
Clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

Safeguarding other children

Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.

It is likely that children will "take sides" following a report and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

As part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

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.

Please refer to Sexual violence and sexual harassment between children in schools and college – September 2021 for more information and amend accordingly.

Sexual violence and sexual harassment between children in schools and colleges (publishing.service.gov.uk)

Section 40: EYFS

Early Years Settings Within Schools
This section relates only to primary schools with nurseries and/or reception classes

Legal and policy framework

As an early year's provider, delivering the Early Years Foundation Stage (EYFS), the school aims to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance.
Early Years Foundation Stage Framework

The school will ensure that children taught in nursery and reception classes are able to learn and develop and are kept safe and healthy so that they are ready for school by providing a safe, secure learning environment that safeguards and promotes their welfare and takes appropriate action where there are child protection concerns.

Safeguarding and child protection

All safeguarding and child protection policies listed in sections 3 of this policy will apply equally to children in early years settings so far as they are relevant to that age group.

In addition, the school has the following child protection practices:

- parents and carers are asked to switch off mobile phones if they are coming into the early years setting and leave the setting if they need to use their mobile.
- Parents are generally prohibited from taking photographs of children in the early years setting, but for special events such as school performances, may do so on the understanding that the images are not posted onto social media sites or otherwise shared.
- staff seek parental permission to take photographs of the children, which must be linked to teaching the curriculum and that they use school equipment only for this purpose.
- staff do not bring personal mobile phones into the early years setting and use them only during breaks in the staff room.
- the staff will adhere to the E-Safety Policy at all times.
- photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy. Where photographs and videos will involve LAC pupils, adopted pupils or pupils for whom there are security concerns, a member of the Senior Leadership Team will liaise with the Designated Safeguarding Lead to determine the steps involved. The DSL will, in known cases of a pupil who is a LAC or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with a pupil.

- staff will report any concerns about another staff members' use of mobile phones to the Designated Safeguarding Lead. and

- a statement on how notifications will be made to Ofsted in the event of an allegation of serious harm or abuse by any person working in the early years setting.

Suitable people and Safer Recruitment

The school will follow the safer recruitment policy set out in this policy to ensure that staff and volunteers who are recruited to work in the early years setting are carefully selected and vetted to ensure they are suitable for working with children and have the relevant qualifications.

Staff policies will apply equally to staff and volunteers in the early years settings, and the school will ensure that they receive appropriate training and induction so that they are aware of their role and responsibilities, all school policies and the school's expectations regarding conduct and safe teaching practice.

Whenever an allegation is made against a member of staff in the early years setting, the school will follow the Croydon policy- https://www.croydonsafeguarding.org/guidance-policy/escalation-and-resolution

Where in the early years staff are taking medication that may affect their ability to care for young children, this will be notified to the head teacher.

Childcare Disqualification – Appropriate checks should be made if there are concerns about a member of the team or the provision's management to make sure they are not disqualified from working in childcare. All information can be found in the statutory guidance.

Staff training, skills and supervision

- All staff in early years' settings have the relevant qualifications and skills for their role and receive the relevant induction, child protection and safeguarding training in line with this policy.

- All policies set out in section 7 of this policy will apply equally to early-year staff.

- All early year's staff receive supervision that helps them to effectively safeguard children by providing opportunities to discuss issues and concerns and decide on what action to take.

- All early year's staff are able to communicate effectively in English both orally and in writing.

- A member of staff who holds a current paediatric first aid certificate is always available on the school premises and accompanies children on school trips.

- Each child in the early years has a designated key worker who liaises with parents to provide individual support for the child.

- A record is kept of staff training – type of training and dates which is recorded on the single central register (SCR)

Staff ratios

The school will ensure that:

- Staff levels within the early years setting comply with statutory guidance and can meet the needs of the children, provide suitable levels of supervision and keep them safe.

- parents are kept informed of staff members and numbers.

- children are always kept within staff sight and hearing.

For nursery classes:

- There will be at least one member of staff for every 13 children
- one member of staff will be a qualified teacher
- At least one member of staff will hold a full and relevant level 3 qualification.

For reception classes:

- class sizes will be limited to 30 pupils
- classes will be led by a qualified teacher supported by suitably qualified support staff.

- For before and after school provision, schools will decide how many staff will be required for adequate supervision based on the age and needs of the children attending.

Health

The school will:

- promote the health of children attending the early years provision
- take necessary steps to stop the spread of infection
- administering medicines only in line with the school's policy
- take appropriate action where children are ill
- ensure any meals provided are nutritious and prepared in a hygienic manner
- notify Ofsted of any serious accident, illness or death of any child whilst attending the early years setting within 14 days.

Safe Sleep

Babies and children must be placed down to sleep safely.
• Children must be placed down on their back in their own separate sleep space on a firm flat surface such as a cot, bed or mattress on the floor.

• Sleep spaces must only contain a firm, flat, waterproof mattress and lightweight bedding which is firmly tucked in around the child below their shoulders to prevent head covering. Alternatively, a well fitted baby sleep bag may be used. Check the manufacturer recommendations before using a baby sleep bag.
• Where blankets are used, the child must be placed feet-to-foot at the bottom of the cot, with blankets tucked in.
• Cots must not contain extra items such as toys, pillows, extra blankets, bumpers, wedges or straps.
• Children should not get too hot or cold. The recommended room temperature for babies is 16 – 20˚C.
• Children's heads must not be covered.
• Children must always be within sight and hearing of staff when sleeping.

Practitioners must read NHS advice on Sudden infant death syndrome (SIDS) – NHS. More information on safer sleep guidance is available from The Lullaby Trust.

Health and safety and suitability of premises

The school will ensure that all indoor and outdoor spaces and facilities used for early years settings are safe and fit for purpose and comply with school policies and standards for site safety and health and safety as set out in this policy. Additionally, the school will ensure that all potential hazards within the school and during school trips are regularly risk assessed.

The school has specific policies for ensuring that records of parents details and contact numbers for emergencies are kept up to date and that children are released to the care of their parent or other responsible adults with the parent's consent at the end of the day as well as policies for dealing with uncollected children.

Managing behaviour

The school will take all reasonable steps to ensure that behaviour management techniques are appropriate to the child's age and that corporal punishment is not used or threatened- Behaviour in Schools

Section 41: Key Contacts
Sutton
Sutton

Children's First Contact Service (CFCS) – 020 8770 6001
childrensfirstcontactservice@sutton.gov.uk

Social Care - Out of Hours – Emergency Duty Team – 0208 770 5000 x9

Sutton Local Safeguarding Children's Partnership: 020 8770 4879
suttonlscp@sutton.gov.uk

Website: www.suttonlscp.org.uk

Sutton LA LADO (Local Authority Designated Officer – complaints against staff) –
0208 770 4776 (LADO@sutton.gov.uk)

Please refer to the Sutton Contact Sheet for individual contact details (Professionals working in Sutton only).

For escalation procedures, please click on the link below:
Sutton Local Safeguarding Children Partnership - LSCP Policy & Practice (suttonlscp.org.uk)

Escalation Process – Cognus

For the Sutton CFCS Operating Protocol which includes guidance on what to do in relation to a serious incident or child death, please click on the link below:

Sutton Local Safeguarding Children Partnership - LSCP Protocols

General Contacts:

- Ofsted 0300 123 1231
- Ofsted whistle blowing line – 0300 123 3155
- Police 999
- NSPCC 0808 8005000
- NSPCC whistle blowing helpline number – 0800 028 0285
- ChildLine 0800 11 11

CROYDON KEY CONTACT DETAILS

Roisin Madden	Director of Children's Social Care	Roisin.Madden@croydon.gov.uk
Julie Daley	Interim Head of Service for MASH & EDT	Julie.Daley@croydon.gov.uk
Nina Chaudhry	Service Manager for MASH and EDT	Nina.Chaudhry@croydon.gov.uk
Steve Hall	Local Authority Designated Officer (LADO)	LADO@croydon.gov.uk
LB Croydon Multi-Agency Safeguarding Hub (MASH)	Early Help & Children's Social Care: 0208 255 2888 Professionals' consultation line Tel: 0208 726 6464 020 8726 6000 (out of hours)	childreferrals@croydon.gov.uk
Early Help Pathways	Lorraine Redmond- EH Lead Lorraine.Redmond@croydon.gov.uk	childreferrals@croydon.gov.uk https://www.croydon.gov.uk/healthsocial/families/ccfpartnership/early-help or the Croydon Safeguarding Children Board Threshold Guidance
Leana Ebanks	Children with Disabilities Service Young Croydon Youth Engagement Team	Leana.Ebanks@croydon.gov.uk
Amanda Andrews	Family Assessment Service	Amanda.Andrews@croydon.gov.uk
Contact for Attendance	Mark Malcolm	Mark.Malcolm@croydon.gov.uk
Contact for CME		cme@croydon.gov.uk

Safeguarding/CP Support for Sutton Schools and other education establishments
2026-2027

Name Organisation	Role	Contact details
Gill Bush **Cognus**	Education Safeguarding Children Adviser **Education Lead in the MASH**	**Direct to GB – 0208 323 0423** gillian.bush@cognus.org.uk **(Please note – previous mobile number no longer in use)**
Hayley Cameron **Cognus**	**Education Safeguarding Manager** *Support for Safeguarding / CP queries, Ofsted ready reviews and training*	**Direct to HC - 0204 582 0847** hayley.cameron@cognus.org.uk **(Please note – previous mobile number no longer in use)**
Stephen Welding **Cognus**	**Education E-Safety Adviser** *E-Safety support and E safety training for staff students and parents. Support for Safeguarding, Ofsted ready reviews.*	**Direct to SW – 0204 582 0322** stephen.welding@cognus.org.uk **(Please note – previous mobile number no longer in use)**
TBC	**Training and Safeguarding Review Adviser**	**(Currently recruiting to post)**
Mick Bradshaw **Cognus**	**Outdoor Education Adviser** *Advice and Safeguarding Support for outdoor education and educational visits/residentials*	**07736 338471** mick.bradshaw@cognus.org.uk
Peter Gasparelli **Cognus**	**Head of Quality and Customer Care Service, Cognus** (Safeguarding Team manager)	peter.gasparelli@cognus.org.uk
Nick English **Cognus**	**Head of Access & Principal Educational Psychologist** *Support for Critical Incidents (e.g., sudden death/suicide)*	nicholas.english@cognus.org.uk
Kate Leyshon **Cognus**	**Headteacher, Sutton Virtual School for Children Looked After**	Kate.leyshon@cognus.org.uk
Amalia Banon **Cognus** **Jo Cassey** **Cognus**	**Head of Service – SEND** **Managing Director/Designated Safeguarding Lead**	amalia.banon@cognus.org.uk Joanna.cassey@cognus.org.uk
Locality Service	**Green** Service Manager Kuhan Valleekanthan	07773 282 4278 Kuhan.valleekanthan@sutton.gov.uk Duty Number: 0208 770 5204

Managers		Green team contact details.docx
	Blue Service Manager Joy Goodger	07736338914 Joy.goodger@sutton.gov.uk Duty Number: 0208 770 5202 Blue team contact details.docx
	Red Service Manager Shelley Carroll	07545201032 Shelley.carroll@sutton.gov.uk Duty Number: 0208 770 5519/ 0208 770 4252 Red team contact details.pdf
Social Care	**Out of Hours - Emergency Duty Team**	0208 770 5000 X 1
	Children's First Contact Service (CFCS)	cfcs@sutton.gov.uk 020 8770 6001
	Adults Social Care	referralpoint@sutton.gov.uk 020 8770 6770
Sutton LA Duty LADO	LADO (Lead Local Authority Designated Officer – complaints against staff) Sima Hirani	0208 770 4776 LADO@sutton.gov.uk sima.hirani@sutton.gov.uk
Prevent Lead	Anisha Patel (Lead) Angela Killalea (Head of Service)	anisha.patel@sutton.gov.uk angela.killalea@sutton.gov.uk
Early Help Coordinators	**Julia Beard**	julia.beard@sutton.gov.uk 072526201093
	Emma Milan	emma.milan@sutton.gov.uk 07523942023
	Paul Lenaghan Service Manager – Targeted Early Help Service	earlyhelpservice@sutton.gov.uk 020 8770 6001 paul.lenaghan@sutton.gov.uk 07933 700 866

Children and Young People's Disability Service	**Faye Bannister** Service Manager	faye.bannister@sutton.gov.uk 07923 439 801 Duty Number: 0208 770 6010
Children's First Contact Service (CFCS) and Emergency Duty Service (EDT)	**Victoria Shaw** Interim Service Manager (from 29/09/2025)	victoria.shaw@sutton.gov.uk 07871 617922
18-25 Learning Disability Team	**Andrea Green** Head of Service	andrea.green@sutton.gov.uk 07742 809956
LSCP		suttonlscp@sutton.gov.uk
CAMHS Duty Line (SPA)		Monday – Friday 9am-5pm 0203 513 3800 For support outside of these hours or at weekends – 0800 028 8000
Reporting a Crime to the Police		Call 101 or report online at https://www.met.police.uk/ro/report/ocr/af/how-to-report-a-crime/
Contact for Encompass Enquiries		SNMailbox.SafeguardingMASHSutton@met.police.uk
Contact for CME	**Gill Bush** **Louise Blay**	cme@cognus.org.uk
Contact for Home Education **Contact for Attendance**	**Sarah Westall** **Recruiting to post**	ehe@cognus.org.uk attendance@cognus.org.uk
CAMHS Senior Clinical Nurse Specialist – Self-Harm	**Sheri Kareem**	sheri.kareem@swlstg.nhs.uk You can also contact: deborah.ayodele@swlstg.nhs.uk 0203 513 3800 (Senior Clinical Nurse Specialist Sutton Tier 3 CAMHS)
Named Nurse, Children's	**Rosie Raynor**	rosie.raynor@sutton.gov.uk

Safeguarding		
Designated Nurse Safeguarding Children	**Tony Bowen**	Anthony.bowen@swlondon.nhs.uk
Education contact for the Police	**Sarah Tynan**	sarah.tynan@met.police.uk
Jonathan Williams **Sutton LA** **Jackie McCarthy** **Sutton LA**	Director of Children's Services Interim Director of Children's Social Care and Safeguarding (Jackie's previous portfolio has been redistributed and is visible in red below).	jonathan.williams@sutton.gov.uk jackie.mccarthy@sutton.gov.uk
Kieran Holliday **Sutton LA**	Director of Education, Integrated Support & Safer Communities DSCO	Kieran.holliday@sutton.gov.uk
Debbie Owen **Sutton LA**	Head of Service, Corporate Parenting Court Progression	07922410853 Debbie.owen@sutton.gov.uk
Emily Reynolds **Sutton LA** **(Leaving Sutton 30th August 2025)**	CLA and Leaving Care Service Manager Placements Fostering	07736 338 318 Duty Number: 0208 770 6600 emily.reynolds@sutton.gov.uk Duty Number: 0208 770 4431 Duty Number: 0208 770 5563
Billi Bartley **Sutton LA**	Service Manager – CLA & Leaving Care	07850 97 93 97 Billi.bartley@sutton.gov.uk
Andrea Bryant **Sutton LA**	Head of Service, Children's First Contact Service, Children's Emergency Duty Team and Children and Young People's Disability Service Localities	07802 655777 Andrea.bryant@sutton.gov.uk
Louise Yardley **Sutton LA**	Service Manager - Quality Assurance, Learning & Partnerships	Louise.yardley@sutton.gov.uk
Michael Radley	Principal Social Worker / Head of Practice Support & Development Service	Michael.radley@sutton.gov.uk 07938500624
Karen Walls **Sutton LA**	Safeguarding Manager - IROs	karen.walls@sutton.gov.uk 07783 828 076
Denise Walford **Sutton LA**	Safeguarding Manager – CP Chairs Court progression	denise.walford@sutton.gov.uk 0207 7704599

Angela Killalea **Sutton LA**	Head of Service, Integrated Support and Safer Communities VAWG and Domestic Abuse	angela.killalea@sutton.gov.uk 07736 338 950
Laura Noulton **Sutton LA**	Service Manager – Integrated Youth Service (Youth Justice, Adolescent Team, Schools Team)	07970 955 105 laura.noulton@sutton.gov.uk
David Charles **Corporate**	Principle Health & Safety Adviser Sutton Local Authority	0208 770 5023 david.charles@sutton.gov.uk

General Contacts:

- Ofsted 0300 123 1231
- Ofsted whistle blowing line – 0300 123 3155
- Police 999
- NSPCC 0808 8005000
- NSPCC whistle blowing helpline number – 0800 028 0285
- ChildLine 0800 11 11

Other relevant safeguarding guidance

Schools can access additional guidance, policies and procedures at:
CSCB local policies and procedures
CSCB Safeguarding in Education Toolkit
DfE Alternative Provision guidance
DfE School Attendance guidance
DfE School Attendance Parental Responsibility Measures guidance
DfE Behaviour in Schools guidance
DfE Preventing and Tackling Bullying guidance
DfE Children Missing Education guidance
DfE Best Practice Advice for School Complaints Procedures
DfE and ACPO Drug Advice for School guidance
DfE Advice for Schools on Equality Act 2010
Behaviour and Exclusions
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 The Prevent Duty – Advice for Schools
DfE Sexual violence and sexual harassment between children in schools and colleges
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
Relationship Abuse: disrespect nobody
Homelessness: how local authorities should exercise their functions
Private Fostering
Upskirting: know your rights

Health and safety and risk assessments Appendix F

Responsibility for health and safety

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

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

Health and safety: Advice on legal duties and powers

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

Name: Alison Cunniffe
Designation: Director of Finance and Operations
Contact details: 020 8669 6306

Name:
Designation: Governor with responsibility for health & safety
Contact details: Care of the School Office

Risk assessments

The school/college will seek to identify and manage risk through the use of risk assessments. These will be carried out:

- on an annual basis for the school environment as a whole.
- for all school trips.
- for pupils travelling between locations during the school day.
- for all work-based learning or work experience placements.
- when a pupil who has been excluded for risky or violent behaviour is returning to the school.
- whenever there are any changes to the school environment or school practices.
- following any serious incident including serious youth violence, harmful sexual behaviour and/or harassment.

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

Working with aggressive and violent parents

Where schools are working with families who are known to children or adult social care and there are concerns about the behaviour of parents towards members of school staff, this must be discussed with the head teacher/ principal and the designated safeguarding lead and the information shared with children's social care.

If there are high levels of risk involved in contact with parents, children's social care may convene a risk assessment meeting with the network in order to discuss strategies to reduce risk, and it is vital that schools and colleges are part of this process.

Site security and visitors

- The Governing Board is responsible for the security of the school premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.
- The head teacher/principal will ensure that contractors have received the appropriate level of DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils.
- Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the head teacher/principal will request written confirmation that relevant checks have been carried out for that individual.
- All visitors and contractors will be:
    - informed to report to reception on arrival.
    - expected to provide proof of identity
    - expected to wear a name-badge or carry some form of identification at all times when on the school premises.
    - suitably supervised by school staff at all times.
    - made aware of school/college health and safety procedures.
- The head teacher will ensure that any contract entered into with contractors' sets out clearly the expectations for worker's behaviour and the responsibility of contractors to monitor and ensure compliance with school/college policies.
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact they will have regarding pupils.

Use of the school premises by other organisations

The school/college will only allow use of the school premises by other organisations or schools outside of school hours for the purposes of providing supplemental schooling if:

- the school's incorporating document allows this.
- the organisation provides an overview of what it intends to teach so that the Head teacher, in line with the school letting policy, is able to make a judgement on whether this is in line with the promotion of British values.
- the organisation can provide evidence that they have followed safer recruitment practices and that their staff have the requisite DBS checks.
- reasonable due diligence checks are taken out on the organisation by the school.

Monitoring and review

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

- all school/college policies are regularly monitored by the designated safeguarding lead and annually reviewed by the head teacher and agreed by the governing board.
- the school/college keeps a central record of all accidents and incidents including what action was taken and by whom.
- staff are aware of their responsibility to record accidents and incidents.
- the head teacher/principal has an overview all accidents/incidents.
- serious accidents and incidents are reported to the Governing Board.
- the designated safeguarding lead ensures a high standard of recording of all concerns held about children.
- all accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around school/college safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action.

Actions where there are concerns about a child (KCSIE Sept 2026) Appendix G

1 In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
2 Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
3 Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
4 Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
5 This could include applying for an Emergency Protection Order (EPO)

St Elphege's RC Infant and Junior & Regina Coeli Catholic Schools

Record of Concern

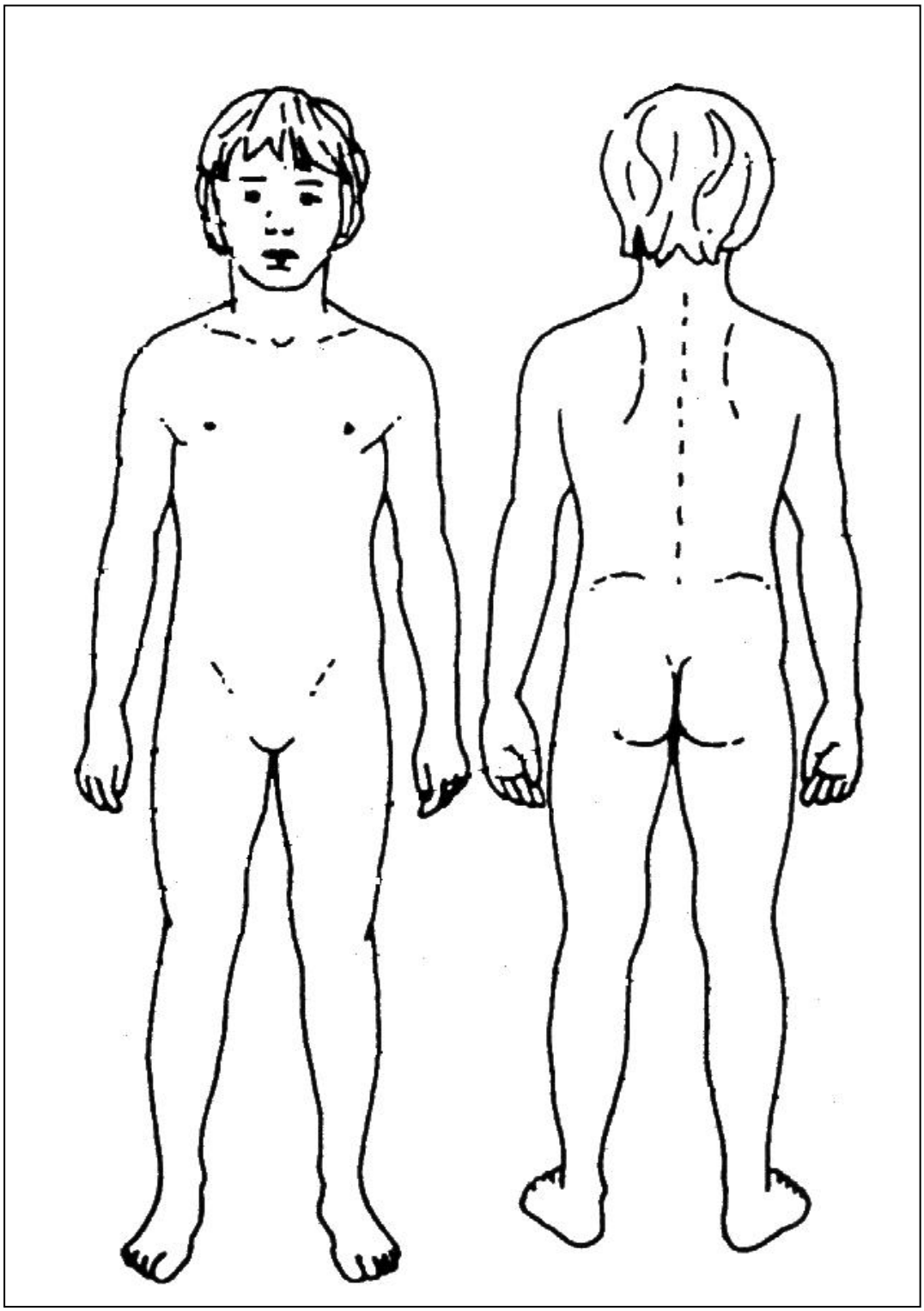
Supplementary Materials 1

Child's Name:		DOB:	
Gender:	Ethnicity:	SEND:	Religion:
Date and Time of Concern:			
Your Account of the Concern: *(What was said, observed, reported and by whom)*			
Additional Information: *(Your Opinion, context of the concern/disclosure)*			
Your response: *(What did you do/say following the concern)*			
Your Name:		Your Signature:	
Position:		No. Attached Sheets:	
Date and Time of Recording:			
Action and Reasoning of DSL / DDSL: *(DSL / DDSL to complete this section. If action is taken, this must refer to an additional chronology)*			
DSL / DDSL Name:		DSL / DDSL Signature:	
Date and Time of Recording:			

Body Maps

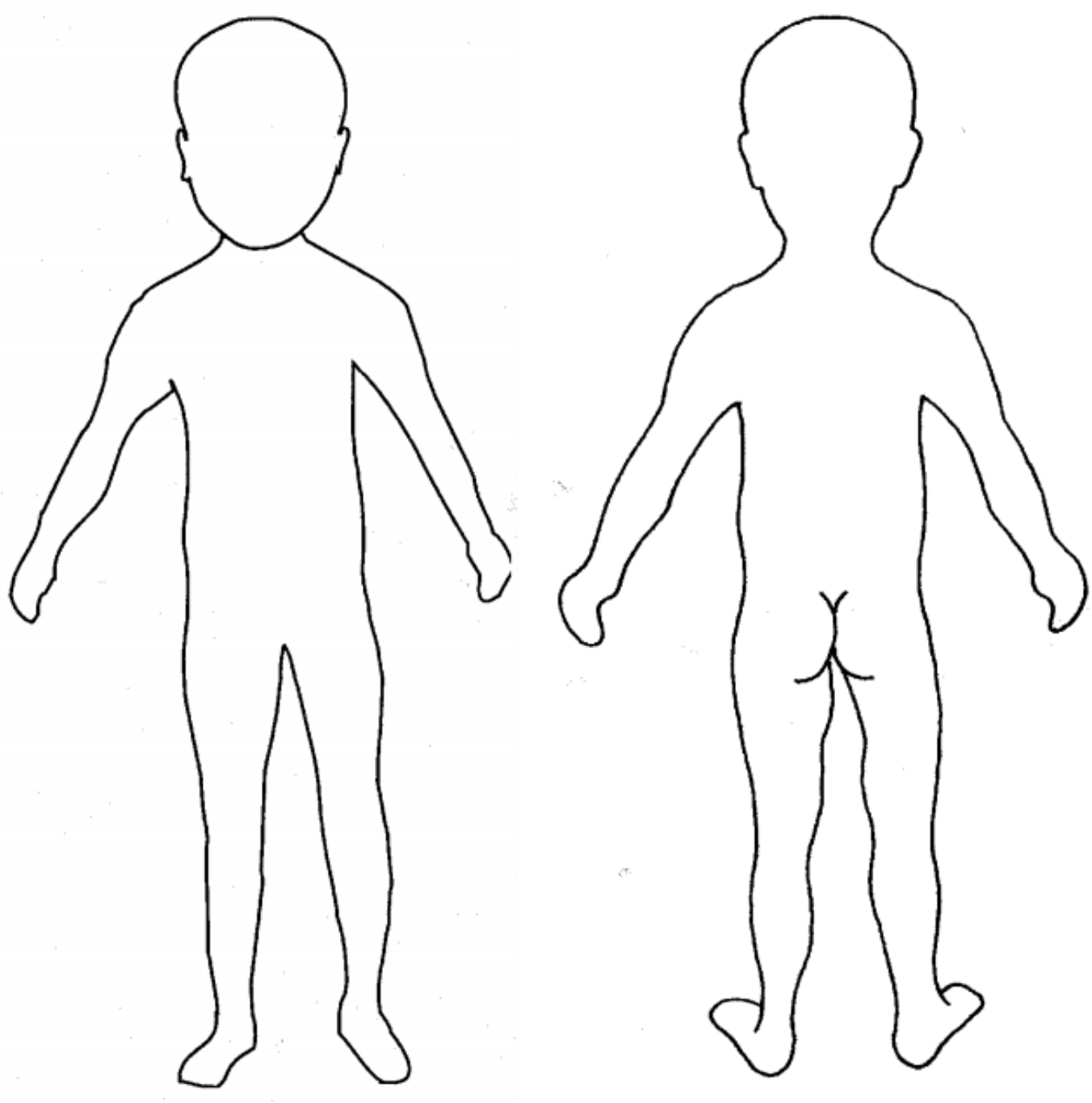
CAUSE FOR CONCERN REPORT: BODY MAP

Child Details:			
Full Name		Date of Birth	
Home Address			
Post Code			
Person completing Map			
Date, time and place of observation			



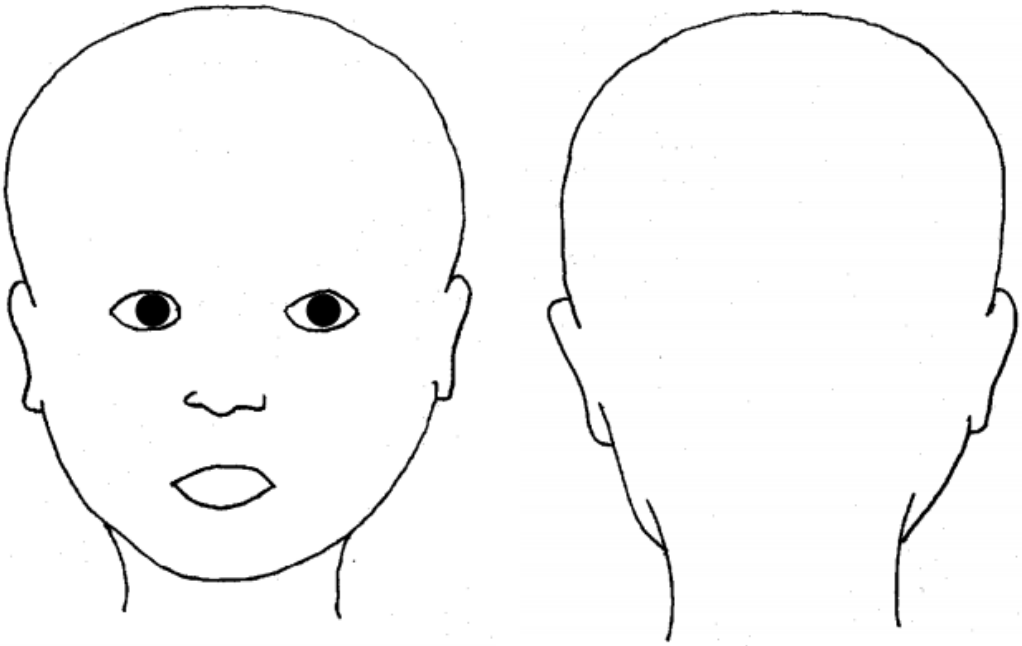
CAUSE FOR CONCERN REPORT: BODY MAP

Child Details:			
Full Name		Date of Birth	
Home Address			
Post Code			
Person completing Map			
Date, time and place of observation			



CAUSE FOR CONCERN REPORT: BODY MAP

Child Details:			
Full Name		Date of Birth	
Home Address			
Post Code			
Person completing Map			
Date, time and place of observation			



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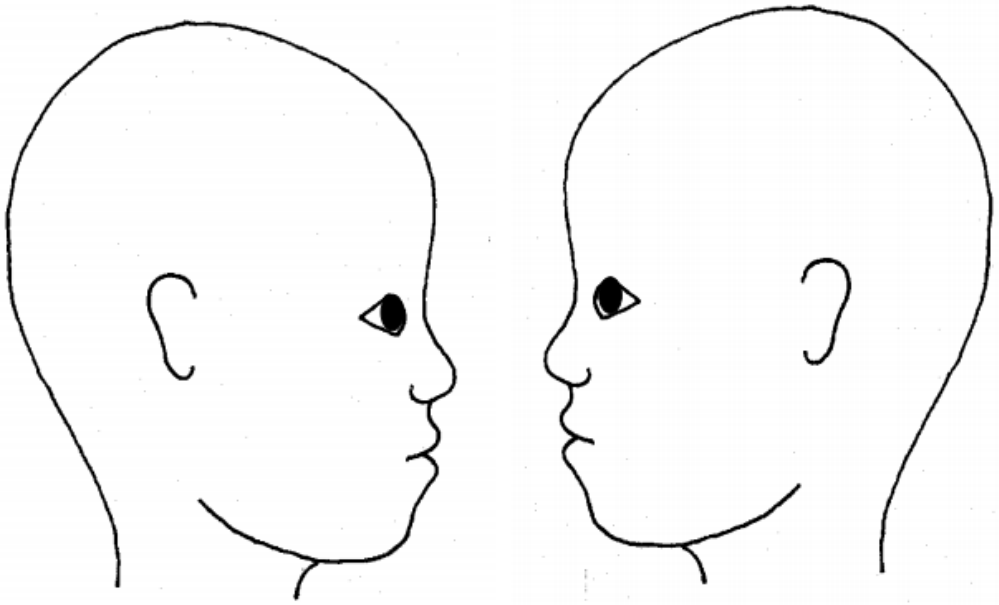

CAUSE FOR CONCERN REPORT: BODY MAP

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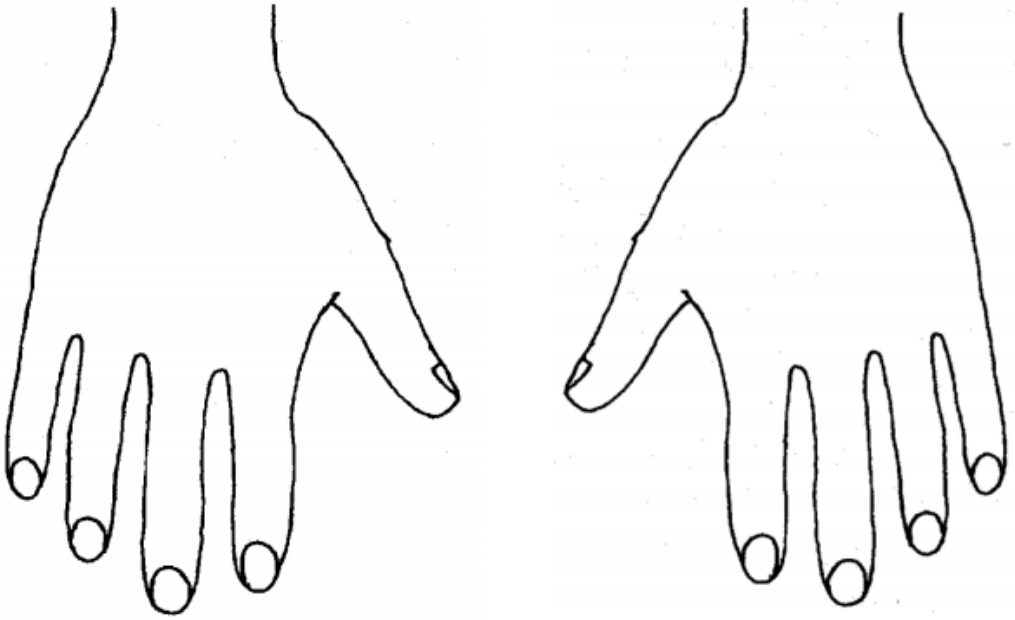
Full Name		Date of Birth	
Home Address			
Post Code			
Person completing Map			
Date, time and place of observation			



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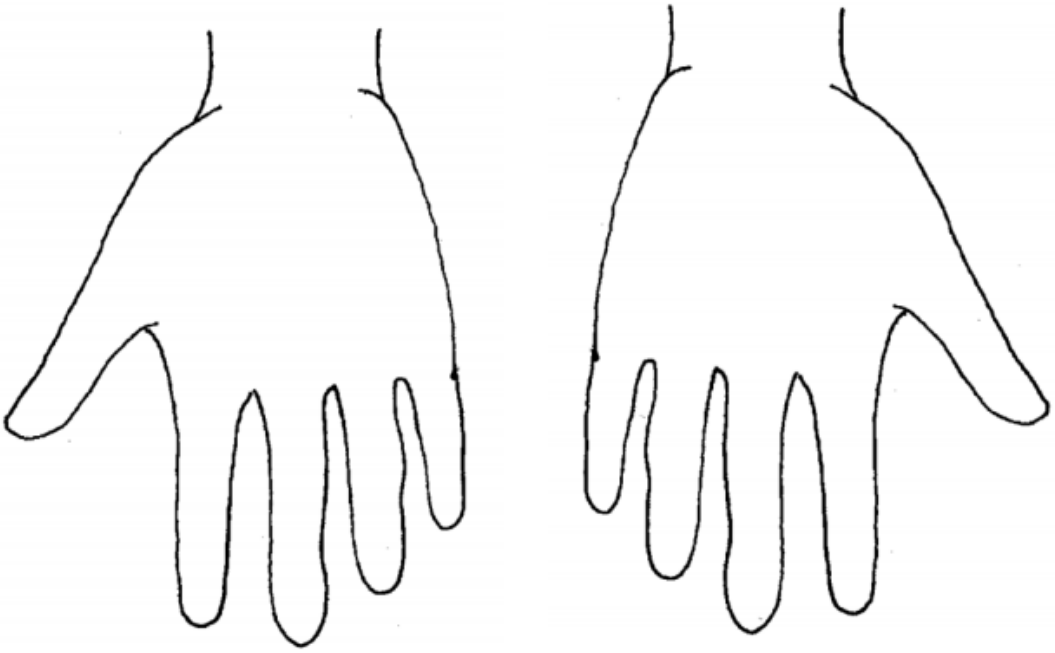

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CAUSE FOR CONCERN REPORT: BODY MAP

Child Details:			
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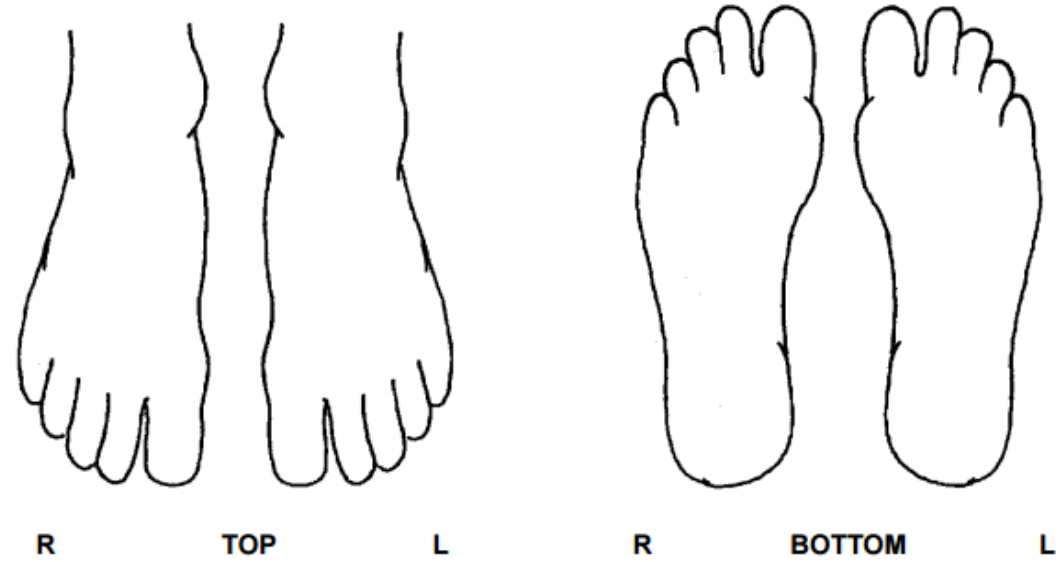
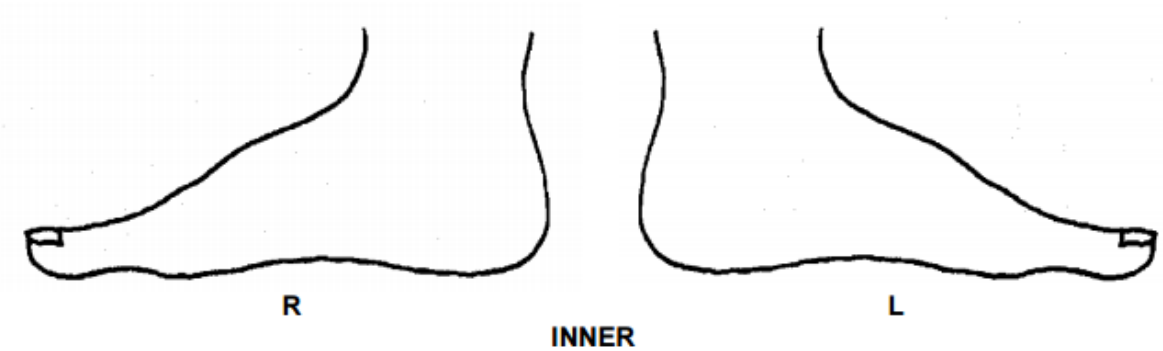
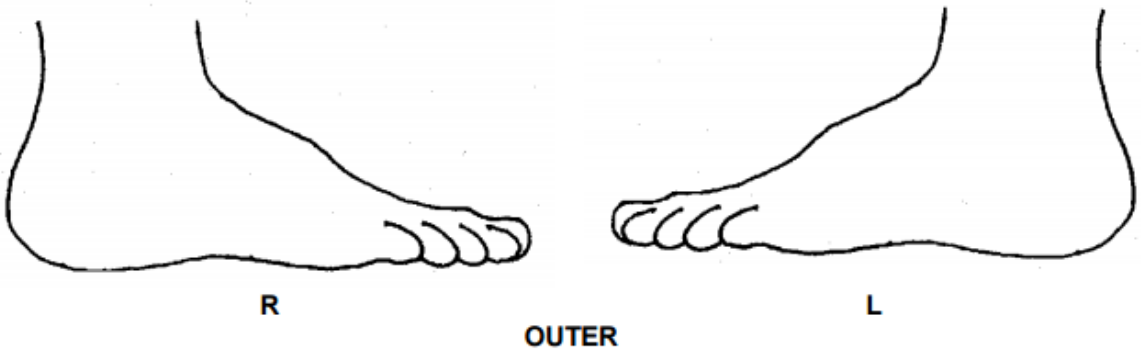
Home Address			
Post Code			
Person completing Map			
Date, time and place of observation			







Supplementary Materials 2

Trips Away From School

Children need to be kept safe when taking trips away from home. It is therefore important that rigorous child protection policies and procedures are in place, in addition to health and safety procedures, adequate insurance, etc. In putting together a trip away from home, some procedures to follow include:

GENERAL

- Ensure children know how to behave, e.g. through a behaviour policy.
- Getting written consent from parents and, if necessary, holding a meeting for parents to give them a briefing on the outing.
- Asking parents about any special needs or requirements for their children.

USING ACTIVITY CENTRES AND OTHER EXTERNAL PROVIDERS

- Use reputable organisations that have in place any licences or accreditation required (some adventure activities require specific licences).
- If possible, visit the centre beforehand and complete a risk assessment. You can ask the centres for their own risk assessment and follow it up with your own.
- Get agreement on the activities to be undertaken if using an adventure activity provider.
- Ensure external providers have proper safety procedures in place (e.g. insurance, maintenance of equipment/ transport, health and safety policies, recruitment of staff to work with children, Child Protection policies etc).
- Ensure the accommodation is suitable.

STAFF/VOLUNTEERS

- Have a person trained in first aid and suitable equipment.
- When staying in self-catering accommodation a member of staff will need a food hygiene qualification (e.g. Level 2 NVQ in Food and Hygiene)
- Have adequate staff ratios. These will depend on the age of the young people and the activity being planned, but DfES guidance on a typical school trip to a museum or historical site are:
    - 1 adult to 6 pupils for under-eights (more adults if under-fives).
    - 1 adult to 10-15 pupils for eight to eleven-year olds.
    - 1 adult to 15-20 pupils for over-elevens.
- Ensure all those attending are aware of their roles and responsibilities.
- Ensure staff/volunteers are competent to lead children in activities.
- EVEN GREATER CARE SHOULD BE TAKEN OVER TRIPS ABROAD.

Two publications in particular provide more detailed information on planning trips away are:

- **Safe Sport Away**, produced jointly by the Amateur Swimming Association and the NSPCC.
- **Health and Safety of Pupils on Educational Visits** DFES (now DfE).

Supplementary Materials 3

ANNEX B - STATUTORY GUIDANCE – REGULATED ACTIVITY (CHILDREN) - SUPERVISION OF ACTIVITY WITH CHILDREN WHICH IS REGULATED ACTIVITY WHEN UNSUPERVISED.

REGULATED ACTIVITY

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government have produced a factual note on Regulated Activity in relation to Children: scope.

Regulated activity includes:

a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children,
b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers;

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes:

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
    - personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing;
    - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

The Safeguarding Vulnerable Groups Act 2006 provides that the type of work referred to at (a) or (b) will be regulated activity if "it is carried out frequently by the same person" or if "the period condition is satisfied". Paragraph 10 of Schedule 4 to this Act says the period condition is satisfied if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving a vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.

This statutory guidance on the supervision of activity with children which is regulated activity when unsupervised is also published separately on GOV.UK.

This document fulfils the duty in legislation that the Secretary of State must publish statutory guidance on supervision of activity by workers with children, which when unsupervised is regulated activity. This guidance applies in England, Wales and Northern Ireland. It covers settings including but not limited to schools, childcare establishments, colleges, youth groups and sports clubs.

For too long child protection policy has been developed in haste and in response to individual tragedies, with the well-intentioned though misguided belief that every risk could be mitigated and every loophole closed. The pressure has been to prescribe and legislate more. This has led to public confusion, a fearful workforce and a dysfunctional culture of mistrust between children and adults. This Government is taking a different approach.

We start with a presumption of trust and confidence in those who work with children, and the good sense and judgment of their managers. This guidance applies when an organisation decides to supervise with the aim that the supervised work will not be regulated activity (when it would be, if not so supervised). In such a case, the law makes three main points:

- there must be supervision by a person who is in regulated activity iii ;
- the supervision must be regular and day to day; and
- the supervision must be "reasonable in all the circumstances to ensure the protection of children".

The organisation must have regard to this guidance. That gives local managers the flexibility to determine what is reasonable for their circumstances. While the precise nature and level of supervision will vary from case to case, guidance on the main legal points above is as follows.

Supervision by a person in regulated activity/regular and day to day: supervisors must be in regulated activity themselves iv . The duty that supervision must take place "on a regular basis" means that supervision must not, for example, be concentrated during the first few weeks of an activity and then tail off thereafter, becoming the exception not the rule. It must take place on an ongoing basis, whether the worker has just started or has been doing the activity for some time.

Reasonable in the circumstances: within the statutory duty, the level of supervision may differ, depending on all the circumstances of a case. Organisations should consider the following factors in deciding the specific level of supervision the organisation will require in an individual case:

- ages of the children, including whether their ages differ widely;
- number of children that the individual is working with;
- whether or not other workers are helping to look after the children;
- the nature of the individual's work (or, in a specified place such as a school, the individual's opportunity for contact with children);
- how vulnerable the children are (the more they are, the more an organisation might opt for workers to be in regulated activity);
- how many workers would be supervised by each supervising worker. In law, an organisation will have no entitlement to do a barred list check on a worker who, because they are supervised, is not in regulated activity. EXAMPLES

VOLUNTEER, IN A SPECIFIED PLACE

Mr. Jones, a new volunteer, helps children with reading at a local school for two mornings a week. Mr. Jones is generally based in the classroom, in sight of the teacher. Sometimes Mr. Jones takes some of the children to a separate room to listen to them reading, where Mr. Jones is supervised by a paid classroom assistant, who is in that room most of the time. The teacher and classroom assistant are in regulated activity. The head teacher decides whether their supervision is such that Mr. Jones is not in regulated activity.

VOLUNTEER, NOT IN A SPECIFIED PLACE

Mr. Wood, a new entrant volunteer, assists with the coaching of children at his local cricket club. The children are divided into small groups, with assistant coaches such as Mr. Wood assigned to each group. The head coach oversees the coaching, spends time with each of the groups, and has sight of all the groups (and the assistant coaches) for most of the time. The head coach is in regulated activity. The club managers decide whether the coach's supervision is such that Mr. Wood is not in regulated activity.

EMPLOYEE, NOT IN A SPECIFIED PLACE

Mrs. Shah starts as a paid activity assistant at a youth club. She helps to instruct a group of children, and is supervised by the youth club leader who is in regulated activity. The youth club managers decide whether the leader's supervision is such that Mrs Shah is not in regulated activity.

In each example, the organisation uses the following steps when deciding whether a new worker will be supervised to such a level that the new worker is not in regulated activity:

- consider whether the worker is doing work that, if unsupervised, would be regulated activity. If the worker is not, the remaining steps are unnecessary;
- consider whether the worker will be supervised by a person in regulated activity, and whether the supervision will be regular and day to day, bearing in mind paragraph 4 of this guidance;
- consider whether the supervision will be reasonable in all the circumstances to ensure the protection of children, bearing in mind the factors set out above; and if it is a specified place such as a school:
- consider whether the supervised worker is a volunteer.

i Safeguarding Vulnerable Groups Act 2006, amended by Protection of Freedoms Act 2012: Schedule 4, paragraph 5A: guidance must be "for the purpose of assisting" organisations "in deciding whether supervision is of such a kind that" the supervisee is not in regulated activity.

ii Safeguarding Vulnerable Groups (Northern Ireland) Order 2007, Schedule 2, paragraph 5A, is as above on guidance on "supervision" for Northern Ireland.

iii If the work is in a specified place such as a school, paid workers remain in regulated activity even if supervised.

iv In future, the Government plans to commence a statutory duty on an organisation arranging regulated activity (under the 2006 Act or 2007 Order, both as amended) to check that a person entering regulated activity is not barred from regulated activity; and plans to commence a stand-alone barring check service by the new Disclosure and Barring Service.

v A volunteer is: in England and Wales, a person who performs an activity which involves spending time, unpaid (except for travel and other approved out-of-pocket expenses), doing something which aims to benefit someone (individuals or groups) other than or in addition to close relatives; in Northern Ireland, a person engaged, or to be engaged, in an activity for a non-profit organisation or person which involves spending time unpaid (except for travel and other approved out-of-pocket expenses) doing something which amounts to a benefit to some third party other than, or in addition to, a close relative.