



TRINITY
S C H O O L

Safeguarding and Child Protection Policy and Procedures (2021)

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1. ROLE OF THE WHITGIFT FOUNDATION AS PROPRIETOR

As proprietor and governing body, The Whitgift Foundation fully undertakes and recognises its statutory and regulatory duties relating to each of the three Foundation schools: Trinity School of John Whitgift, Old Palace of John Whitgift School, and Whitgift School. The Foundation has extensive statutory and regulatory duties beyond those relating to its three schools in the form of care homes and other significant commercial interests.

Therefore, to support the Court of Governors of the Whitgift Foundation (the 'Court') in fulfilling the Foundation's statutory and regulatory responsibilities, each of the three Foundation schools has its own School Governing Committee, of which at least four members are Court Governors, including the Chairman. The Head of each school reports directly to the Chairman of the School Committee and it is the School Committee that has direct oversight of the School and its performance.

Each of the three school committees, supported by sub-committees, are charged (without the Foundation delegating its responsibilities) to review in detail and monitor all statutory and regulatory requirements and report back to the Court, which meets four times a year, via the Chairman of the School Committee and the submission of School Committee minutes, so that the Court can consider and oversee any matters arising and deal with them as appropriate.

A Court Governor will be appointed to take lead responsibility for safeguarding arrangements on behalf of The Whitgift Foundation and this appointment will be reviewed annually by the Court.

2. INTRODUCTION

Trinity School (hereafter referred to as the 'School'), the Trinity School Committee and the Whitgift Foundation fully recognise their moral and statutory responsibility to safeguard and promote the welfare of all children. The School and its Governors (that is, members of the School Committee comprising the School's governing body) are wholly committed to providing a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and have in place procedures to ensure that children receive effective support, protection and justice as required. In all its dealings, the Whitgift Foundation, the Trinity School Committee and staff of the School are committed to considering at all times what is in the best interest of the pupils of the School.

The Senior Leadership of the School recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and will provide opportunities for staff to contribute to, and shape, safeguarding arrangements and child protection policy.

While this policy seeks to explain and accurately articulate the School's approach to safeguarding, it is essential that anyone who teaches, coaches or supervises Trinity School pupils understands that they are able to make a direct referral to external safeguarding authorities at any time should they feel concerned about the welfare of a pupil. See section 5.1 and Appendix B for procedures.

Safeguarding and Promoting the Welfare of Children is:

- Protecting children from maltreatment;

- Preventing impairment of children’s mental and physical health and development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

The School’s ‘Safeguarding and Child Protection Policy and Procedures’ will be reviewed annually by the Trinity School Committee, unless an incident or new legislation or guidance suggests the need for an earlier date of review. The reviewed policy will be presented to the Court of the Foundation for approval.

The School will maintain written records of concerns, discussions and decisions made, and the reasons for those decisions, about children (noting the date, event and action taken), even when there is no need to refer the matter to children’s services, the police or other agencies.

Key documents which inform this policy are:

- Keeping Children Safe in Education (KCSIE) (September 2021)
- Working Together to Safeguard Children (July 2018)
- The Prevent Duty (2015)

3. THE PRINCIPLES AND AIM OF THIS POLICY:

3.1 PRINCIPLES

The School and its Governors are committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment so as to create an open environment where staff and pupils feel able to raise concerns, and where concerns will be listened to with a readiness to involve support services and other agencies as necessary:

- The school will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities;
- All children, regardless of age, sex, gender identity, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties;
- All members of staff are responsible for safeguarding the welfare of children as part of their professional duties;
- All staff have an equal responsibility to act, in accordance with this policy and Keeping Children Safe in Education (Part 1 or Annex A), on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of significant harm;

A child’s wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible.

The School is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the School’s Safer Recruitment policy.

All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the school who will follow this policy guidance and statutory guidance in doing so.

The School will work with other agencies wherever such work is needed to ensure adequate arrangements to identify, assess and support those children who are suffering significant harm or who may suffer significant harm without appropriate intervention. The School will work with the Croydon Safeguarding Children Partnership, the police, health and other services to promote the welfare of children and to protect them from harm.

Where requested to do so, the School will allow access for children's social care from the Local Authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. In addition, the School will comply with any request to supply information to the Local Safeguarding Children's Partnership that it requires in order for it to perform its functions.

The School recognises the need to differentiate between safeguarding children who have suffered or who are likely to suffer harm and those in need of additional support from one or more agencies. The former is recognised as needing to be referred to social services **immediately** and the latter should lead to inter-agency assessment using local processes, including use of the 'Common Assessment Framework' (CAF) and 'Team Around the Child' approaches.

If a crime has been committed, the School will ensure that the police are contacted immediately. This contact will be made prior to any discussion of the incident with parents and pupils.

While decisions to seek support for a child in need would normally be taken in consultation with parents and pupils, their consent is not required to make a referral if there are reasonable grounds to believe that a child is at risk of significant harm.

3.2 AIMS:

As stated in the introduction, the School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. As such, the School aims:

- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- To raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children, known or thought to be at risk of harm.
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.

- To ensure that key concepts of Child Protection are integrated within the curriculum via Personal Development (PSHE) and Sixth Form Diploma lessons.
- To develop effective working relationships with all other agencies, involved in safeguarding children.
- To ensure that all adults within our school who have access to children have been checked as to their suitability.

4. KEY PERSONNEL

The School has both a Designated Safeguarding Lead and three Deputy Designated Safeguarding Leads.

Designated Safeguarding Lead (DSL):	Sara Ward
<i>Role in school: Pastoral Deputy Head</i>	0208 656 9541 07540 691 099 safeguarding@trinity.croydon.sch.uk slw@trinity.croydon.sch.uk

Deputy Designated Safeguarding Leads (DDSL):		
Rebecca Petty	Sam Powell	Antonia Geldeard
0208 656 9541	0208 656 9541	0208 656 9541
rp@trinity.croydon.sch.uk	xsp@trinity.croydon.sch.uk	azg@trinity.croydon.sch.uk

References in this policy to the Designated Safeguarding Lead should be assumed to apply equally to the Deputy Designated Safeguarding Leads.

Headmaster:	Alasdair Kennedy 0208 656 9541 hmsec@trinity.croydon.sch.uk
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Chair of Trinity School Committee: (Member of the Whitgift Court of Governors)	Mr David Seymour seymourdavid1@yahoo.co.uk
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Chair of the Whitgift Foundation:	Chris Houlding 0208 680 8499
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Child Protection Governor for the School:	David Seymour seymourdavid1@yahoo.co.uk
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Local Authority Designated Officer (LADO):	Senior LADO: Steven Hall LADO: Jane Parr Business Support Officer: Karen Anns Direct line: 020 8255 2889 lado@croydon.gov.uk
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In Croydon, child protection referrals should be made to the 'Single Point of Contact, which is made up of the 'Multi-Agency Safeguarding Hub' (MASH) and 'Early Help'

Professionals' consultation line **Tel: 0208 726 6464** Out of Hours **Tel: 0208 726 6400**

Referrals for pupils living outside the borough of Croydon will be made directly to the safeguarding team of the appropriate local authority.

Reports of concerns under the Prevent duty should be made to safercroydon@croydon.gov.uk.

5. CHILD PROTECTION PROCEDURES:

The School's procedures for safeguarding children are in line with the Croydon LA and 'Croydon Safeguarding Children Partnership' child protection procedures. This means we will ensure that:

- We have a designated senior member of staff (Designated Safeguarding Lead) for child protection, who is a member of the School's Senior Leadership Team, who has undertaken appropriate training including local safeguarding thresholds and referral processes, online safety and the Prevent Duty.
- We have other members of staff who will act in the Designated Safeguarding Lead's absence (Deputy Designated Safeguarding Leads), who have also received training to the same level as the Safeguarding Lead.
- The DSL and DDSs will receive appropriate training, as recommended by the Croydon Safeguarding Children Partnership.
- All members of staff will receive appropriate training:
 - to develop their understanding of the signs and indicators of abuse
 - how to respond to a pupil who discloses abuse
 - about the procedure to be followed in sharing a concern of possible abuse or a disclosure of abuse
- Parents/carers are made aware of the school's responsibilities in regard to child protection procedures through publication of this policy on the School website.
- All staff new to our school will be made aware of the School's policy and procedures, the name and contact details of the Designated Safeguarding Lead/Deputy Designated Safeguarding Leads as part of their induction into the school.
- All Trinity staff will provide written confirmation that they have read and understood the Part 1 (or Annex A for those who do not work directly with children) of Keeping Children Safe in Education (2021), the School's Safeguarding and Child Protection Policy, Behaviour and Sanctions Policy, Staff Code of Conduct, Missing Pupil and Whistleblowing Policies.
- We will always communicate readily with the Croydon Safeguarding Children Partnership (and other safeguarding authorities where appropriate) whenever an allegation or disclosure is made.
- Our safeguarding procedures will be reviewed and updated annually.

5.1 WHAT TO DO IF YOU ARE CONCERNED ABOUT A CHILD:

All staff should be aware of indicators of abuse or neglect so that they are able to identify cases of children who may be in need of help or protection. Indicators of abuse or neglect are described in Appendix A of this policy.

Where staff see in children signs which cause them concern, they should speak to the DSL or Deputy. It is not the role of staff to carry out an investigation. The member of staff should make a written note of the concern, recording the date, concern and action taken and pass it to the Designated Safeguarding Lead who will take action and keep records of the concern and action taken.

All child protection records will be filed securely and separately from the main pupil files. They include a comprehensive outline of the concern, details of how it was followed up, notes of actions and decisions, and the outcome. At Trinity these records are kept online using the platform MyConcern.

If a member of staff is concerned that a pupil may be suffering significant harm or is at risk of significant harm, the matter should be referred to the DSL, or deputy in the DSL's absence, as soon as possible.

If there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care **immediately**, or in an emergency, dial 999 and request the appropriate emergency service. Anyone can make such a referral and the police must be contacted if there is reason to believe that a crime has been committed.

See Appendix B for a flow chart illustrating actions to be taken when there are concerns about a child.

In Croydon, child protection referrals should be made to the 'Single Point of Contact, which is made up of the 'Multi-Agency Safeguarding Hub' (MASH) and 'Early Help' Professionals' consultation line **Tel: 0208 726 6464** Out of Hours **Tel: 0208 726 6400**

Many Trinity pupils live in boroughs other than Croydon. Referrals must be made to the Safeguarding Children's Partnership in the borough where they are resident. The Designated Safeguarding Lead can advise further if required.

Reports of concerns under the Prevent duty should be made to safercroydon@croydon.gov.uk.

5.2 WHAT TO DO IF A CHILD DISCLOSES INFORMATION TO YOU:

It takes a lot of courage for a child to disclose that they are being neglected and / or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that **you must** pass the information on – you are not allowed to keep secrets or promise

confidentiality. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen; if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

If a child volunteers information about abuse to a member of staff, it may sometimes be done obliquely rather than directly. An abused child is likely to be under severe emotional stress and the staff member may be the only adult whom the child is prepared to trust. When information is offered in confidence, the member of staff will need to explain with sensitivity, whilst retaining the child's trust, that action may be required, that other adults will need to be informed and that complete confidentiality cannot be honoured. Staff need to be aware that the most important aspect of their response to a child is willingness to listen and to take seriously what the child is saying, without asking questions or making any assumptions (e.g. about who has abused the child) which could later be interpreted as leading the child if criminal proceedings were to follow. The child should tell the full story of what has happened only once. The member of staff should make a written note of the discussion as soon as possible, recording date, place and names of any else present, and using the words of the child where they are remembered. In any criminal proceedings these notes would be potentially disclosable to both the prosecution and defence lawyers.

During your conversation with the child:

- Allow them to speak freely.
- Remain calm and do not over-react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for the child.
- Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, or what the child’s mother thinks about all this.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.
- Tell the child what will happen next.
- The child may agree to go with you to see the DSL. If they do not, contact the DSL or deputy and ask them to come to you.

After your conversation with the child:

- If you have been unable to contact the DSL or Deputy, refer directly to the police or children’s social care yourself. You do not need the consent of the child or parent to do this.
- Seek support if you feel distressed.
- Consider whether the action required of you constitutes ‘Whistleblowing’ (see Whistleblowing Policy for further information)

If the disclosure involves peer-on-peer abuse, in particular that involving sexual violence, please see sections 6.3 and 8.2.2 for further information.

5.3 CONFIDENTIALITY

- The School recognises that all matters relating to child protection are confidential.
- The Designated Safeguarding Lead will disclose personal information about a pupil to other members of staff on a need-to-know basis only.
- All staff are aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.
- School staff will always undertake to share our intention to refer a child to social services with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation.
- Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.
- Further information on sharing information can be found via this link: <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>. This advice includes the seven golden rules for sharing information.
- See also Section 23 on Data Protection which gives further guidance about sharing or withholding personal information in relation to safeguarding concerns.

5.4 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. Early help can prevent further problems arising and/or escalating in the future.

Staff at the School are aware of the importance of being alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education health and care plan);
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing / goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;

- is at risk of being radicalised or exploited;
- is a privately fostered child.

Staff are aware of the benefits of early help to a pupil who may be experiencing difficulty, and understand their role in identifying emerging problems, liaising with members of the pastoral team and sharing concerns with the Designated Safeguarding Lead.

Please see Appendix C for details about the School's named Early Help Advisor.

6. SAFEGUARDING ISSUES: WHAT STAFF SHOULD LOOK OUT FOR

6.1 SAFEGUARDING ISSUES AND CONTEXTUAL SAFEGUARDING

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 their families and outside the home. 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.

6.2 ABUSE AND NEGLECT

Detailed information on specific forms of abuse and indicators of abuse is outlined in Annex A of Keeping Children Safe in Education 2021 which all members of staff (including supply staff and volunteers) must read. This content is outlined below. Further information about indicators of abuse and neglect can be found in appendix A of this policy.

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 a high level of 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 (see section 8.2 of this policy and the more detailed information in our policy 'Allegations of Sexual Violence and Sexual Harassment between Pupils').

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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

6.3 PEER ON PEER ABUSE

All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse) and that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse they should speak to the designated safeguarding lead (or deputy)

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer abuse is most likely to include, but may not be 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;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery – see further information in section 6.6 of this policy);

- upskirting, 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).

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

All staff should be clear as to the school's policy and procedures with regards to peer-on-peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

See Section 8.2 for information on how to respond to allegations of peer-on-peer abuse.

6.4 SERIOUS VIOLENCE

All staff should be aware of indicators that may signal that children are at risk from or involved in 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 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.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, 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.

6.5 FEMALE GENITAL MUTILATION AND OTHER FORMS OF 'HONOUR-BASED VIOLENCE'

All staff should speak to the DSL or Deputy with regard to concerns about FGM. For teachers, there is a specific duty to report this concern to the police.

'Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the designated safeguarding lead. 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.

There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM – see Section 2.5 of the document hyperlinked below for the nationalities that traditionally practise FGM. Provided that the mutilation takes place in the UK, the nationality or residence status of the victim is irrelevant.

Further detailed guidance can be found here:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf

Mandatory Reporting:

All staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, becomes aware of, or has reason to suspect that, female genital mutilation has been carried out on a girl under that age of 18, they must report their concern immediately to the police and, thereafter and unless there is a good reason not to do so, to the Designated Safeguarding Lead. If the DSL is unavailable, or if the person reporting their suspicion feels unable to approach the DSL, the report will be made to a Deputy Designated Safeguarding Lead and, if none of them is available, the most senior member of staff will be alerted.

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 social workers and healthcare professionals, 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 will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and teachers should not be examining pupils, 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.

6.6 SEXTING / YOUTH PRODUCED SEXUAL IMAGERY / SHARING NUDES AND SEMI-NUDES

The latest advice for schools and colleges is available via this link: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

This advice uses the term ‘sharing nudes and semi-nudes’ to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline.

Many professionals may refer to ‘nudes and semi-nudes’ as:

- youth produced sexual imagery or ‘youth involved’ sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- ‘sexting’. Many adults may use this term, however some young people interpret sexting as ‘writing and sharing explicit messages with people they know’ rather than sharing images
- image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes

Terms such as ‘revenge porn’ and ‘upskirting’ are also used to refer to specific incidents of nudes and semi-nudes being shared.

This does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

6.6.1 Dealing with an incident involving nudes or semi-nudes

When an incident involving nudes or semi-nudes comes to the attention of a member of staff the school will follow the procedures laid out in 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (link above). A summary of key advice is included below:

- The incident should be referred to the DSL as soon as possible
- The DSL will hold an initial review meeting with appropriate school staff to establish whether there is an immediate risk to the young person or young people, whether a referral should be made to the police and / or children's social care. Appendix A in the 'sharing nudes' advice will be used to help make this decision.
- An immediate referral to police and / or children's social care will be made if:
 1. The incident involves an adult
 2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent
 3. What is known about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
 4. The imagery involves sexual acts and any pupil in the images or videos is under 13
 5. There is reason to believe a child is at immediate risk of harm owing to the sharing of the images or videos (eg the pupil is suicidal or self-harming)

The decision to respond to the incident without involving police or children's social care will only be made when the DSL (or Deputy DSL, in the DSL's absence) is confident they have enough information to assess the risks to any child involved and that those risks can be managed within the school's pastoral support and disciplinary framework. The decision will be made with input from the Headteacher, and other members of SMT or staff if appropriate.

- If police / children's social care are not involved, there will be subsequent interviews with the young people involved (if appropriate), and the DSL / DDSL will complete a risk assessment in relation to the incident.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm or that informing them could interfere with a criminal investigation.
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.
- Decisions will be based on consideration of the best interests of the young people involved, and take into account proportionality as well as the welfare and protection of young people. The decisions and reasons for them will be recorded, and reviewed throughout the process.

6.7 CHILD SEXUAL EXPLOITATION AND CHILD CRIMINAL EXPLOITATION

Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse 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.

6.7.1 Child Criminal Exploitation

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

6.7.2 Child Sexual Exploitation

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

Exploitation, as well as being physical, can be facilitated and / or take place online. It may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex.

Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

More information and definitions are included in Part 1 and Annex B of Keeping Children Safe in Education 2021.

6.8 MENTAL HEALTH

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.

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 and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and

into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child, they should inform the relevant Head of Year. If there is a mental health concern that is also a safeguarding concern, they should immediately speak to the designated safeguarding lead or a deputy.

6.9 OTHER SAFEGUARDING CONCERNS

Information about the safeguarding concerns listed below can be found in Annex B of KCSIE (2021):

Child abduction and community safety incidents; Children and the court system; Children missing from education; Children with family members in prison; County lines; Modern slavery and the National Referral Mechanism; Cybercrime; Domestic abuse; Homelessness; Preventing radicalisation, the Prevent Duty and Channel (see also section 22 of this policy).

In addition, Annex B contains information on:

Child sexual exploitation and child criminal exploitation; Honour-based abuse (including FGM and forced marriage); Peer on Peer abuse; Sexual violence and sexual harassment between children in schools and colleges; Upskirting; the response to a report of sexual violence or sexual harassment

7. CHILDREN POTENTIALLY AT GREATER RISK OF HARM

7.1 CHILDREN WITH A SOCIAL WORKER (CHILD IN NEED AND CHILD PROTECTION PLANS)

When a child is allocated a social worker, the Local Authority should inform the school about this. The Safeguarding Lead will 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.

This will 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).

7.2 CHILDREN REQUIRING MENTAL HEALTH SUPPORT

The School has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems, as outlined in the School's *Mental Health Policy*.

7.3 LOOKED AFTER CHILDREN

The School is aware of its moral and statutory obligation to support Looked After Children, and that previously looked after children potentially remain vulnerable. As for all our pupils, the School is committed to helping every Looked After Child (LAC) to achieve the highest standards they can, including supporting aspirations to achieve in further and higher education. The Designated Safeguarding Lead has specific responsibility for overseeing the welfare and progress of any Looked After Child attending Trinity School. Prompt action and effective liaison with other agencies is essential to safeguard these children, who are a particularly vulnerable group.

(See 'Policy for the Education of Looked After Children' for further details)

7.4 CHILDREN WITH AN SEND DIAGNOSIS

While Trinity students are high functioning relative to the wider population of SEND students, the school recognises that our students who have special educational needs or disabilities may be more vulnerable to various risks, such as bullying, online grooming or criminal exploitation. Staff will be mindful of this increased vulnerability. If there is a safeguarding concern about a student with a SEND diagnosis, the Safeguarding Team will read the student's IEP and act in line with the recommendations it makes. A referral to outside agencies will always include information about a child's SEND status.

8. RESPONSE TO ALLEGATIONS

8.1 ALLEGATIONS AGAINST STAFF AND VOLUNTEERS WORKING AT THE SCHOOL:

If a child or his/her parent discloses to a member of staff information about abuse by another member of staff (including supply staff and volunteers), the person receiving the information should immediately pass it to the Headmaster. If the allegation made to a member of staff concerns the Headmaster, the person receiving the allegation should immediately contact the Chair of Governors, without informing the Headmaster. The Chair will then consult the LADO without notifying the Headmaster first.

8.1.1 Allegations that may meet the harms threshold

This guidance applies to the management of cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college, specifically allegations that indicate a person has:

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

The last bullet point above includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children; this is known as transferable risk (eg involvement in domestic abuse, even if the incident did not involve a child). Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. Advice will be sought from the LADO to clarify whether a situation meets the criteria for transferable risk if unclear.

The Headmaster on all such occasions will immediately (or, at the latest, within 24 hours of the allegation being made), discuss the content of the allegation with the DSL (or Deputy DSL if the DSL is the subject of the allegation) and the LADO. If the Headmaster/ senior teacher believes that a crime has been committed, the police will be contacted immediately. Other than carrying out basic checks such as establishing whether the individual was present at the location named at the time of the allegation, whether they could have come in contact with the child, and

whether there are witnesses or CCTV, no investigation will be undertaken by any member of the School without prior consultation with the LADO or police. This is to ensure that statutory investigations are not jeopardised. In borderline cases, informal discussions will be held with the LADO, with neither the name of the School nor the individual concerned being mentioned. If any investigations are to be carried out subsequent to that discussion, they will be conducted on the basis of the advice received by the LADO/ police.

Where an adult makes an allegation to the School that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child, will be reported to the LADO in line with the local authority's procedures. The LADO will coordinate with children's social care and the police.

When dealing with an allegation the School response will consider two aspects:

- Looking after the welfare of the child - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- Investigating and supporting the person subject to the allegation - the Headmaster should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

Teachers are particularly vulnerable to accusations of abuse but even though such allegations may be false, malicious or misplaced, reporting in line with the pathways laid out above must be immediate and the informant assured of that. The member of staff against whom the allegation has been made will not be informed of the allegation until after the LADO has been consulted.

All aspects of the response to an allegation against a member of staff (including supply staff and volunteers), including reporting, investigating, decision-making, confidentiality, record-keeping and support for those involved will be undertaken in line with the guidance published in Keeping Children Safe in Education 2021 and with reference to the harms test (see below).

Colleagues should take steps to minimise the impact of an unfounded allegation through following this advice:

- All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- All staff should be aware of the School's Behaviour and Sanctions Policy and the Staff Code of Conduct.

The Headmaster will report to the Disclosure and Barring Service (DBS) any person whose services are no longer used because he or she is considered unsuitable to work with children as soon as possible. The Headmaster shall also report, within one month, any cases of teachers leaving the school because he or she is considered unsuitable to work with children to the Teacher Regulation Agency. Where a teacher's employer dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State via the Teaching Regulation Agency.

The duty to refer to the DBS relates to anyone who has harmed or poses a risk of harm to a child or vulnerable adult where:

- The harm test is satisfied in respect of that individual. Guidance is available here: <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>
- The individual has received a caution or conviction for a relevant offence, or there is a reason to believe that the individual has committed a listed relevant offence
- The individual has been removed from working (paid or unpaid) in a regulated activity, or would have been removed had they not left.

(See '[Whistleblowing policy](#)' for further information about raising concerns relating to school staff).

It is a legal duty to take action when there is a safeguarding concern or allegation about a member of staff who may pose a risk of harm to children and failure to refer when the criteria are met is a criminal offence.

8.1.2 Concerns that do not meet the harms threshold – low level concerns

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 in section 8.1.1 above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

All low-level concerns will be recorded in writing. The record will be stored confidentially and securely and will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will take action, either through its disciplinary procedures or through a referral to the LADO where a pattern of behaviour moves from a concern to meeting the harms threshold.

As per guidance set out in Keeping Children Safe in Education 2021, records will be retained at least until the individual leaves the School's employment.

All aspects of the response to a low level concern will be undertaken in line with the guidance published in Keeping Children Safe in Education 2021

8.2 ALLEGATIONS MADE AGAINST FELLOW PUPILS (PEER ON PEER ABUSE):

Peer-on-peer abuse is defined and explained in section 6.3 of this policy.

Any allegations of abuse made by one or more pupils against another pupil must be reported to the Designated Safeguarding Lead, who will take necessary measures to safeguard the pupil and will refer the matter immediately to the Headmaster or most senior teacher present.

Staff and Governors will not tolerate any form of abuse at the School and will not pass it off as 'banter', 'just having a laugh' or 'part of growing up'. The School recognises the gendered nature of peer-on-peer abuse (ie that it is more likely that girls will be victims and boys perpetrators) but that all peer or peer abuse is unacceptable and will be taken seriously.

It is the School's assumption that, in the event of serious allegations being made of pupil on pupil abuse, all children involved (whether perpetrator or victim) are at risk and the Designated Safeguarding Lead will refer the matter to Children's Social Care in the borough(s) where the pupil(s) are resident immediately or, at the latest, within 24 hours.

Procedures for recording, investigating and dealing with peer on peer abuse can be found in the Anti-bullying Policy and the 'Allegations of Sexual Violence and Sexual Harassment between Pupils' policy.

8.2.1 Procedures to minimise the risk of peer-on-peer abuse

Creating an appropriate culture within the School:

- The School uses a variety of methods (e.g. Personal Development (PSHE) and Diploma lessons, tutorials, whole-school and year-group assemblies) to foster a culture in which all members of its community treat one another with courtesy, kindness and respect.
- All staff receive safeguarding training and are required to confirm that they have read, understand and are able to implement the School's Safeguarding and Child Protection Policy.
- All staff are also required to confirm that they have read and understood Part One (or Annex A for those who do not work directly with children) of the most recent version of Keeping Children Safe in Education

Examples of practical steps taken to minimise the risk of peer-on-peer abuse:

- Pupils are encouraged to share any concerns they have about their safety and wellbeing with friends, their tutor, a trusted member of staff or the Designated/ Deputy Designated Safeguarding Lead. Posters emphasising this are located in all Form rooms and there is clear advice on students' Firefly pages about what to do if they have a concern, which can be accessed directly or via a 'report a concern' button on the dashboard. This information is (re)advertised to all students at the start of each term.
- Students are educated about abusive behaviours including sexual harassment, consent, sexual assault, rape, sharing indecent images of under 18s (with or without consent), bullying, discrimination, to help them recognise and report these behaviours.
- Classrooms have windows in doors to ensure that anyone passing a room can see into it
- Any and all forms of bullying are dealt with swiftly and firmly by staff and pupils are encouraged to share information about bullying with a member of staff.
- No form of initiation is tolerated
- Students are supervised by prefects and members of staff during the day
- Unless involved in formal after-school activities, pupils are not allowed to stay on the school site once the school day has ended.
- Staff recognise the vulnerability of pupils with SEND

(See Anti-bullying Policy, Supervision of Pupils: Guidance for Staff, Behaviour and Sanctions policy and Allegations of Sexual Violence and Sexual Harassment between Pupils policy for further information).

8.2.2 Responding to a report of peer-on-peer abuse

This section outlines how allegations of peer-on-peer abuse will be recorded, investigated and dealt with:

8.2.2.1 Responding to Bullying and Physical Abuse, including initiation rituals / violence

- When a member of staff becomes aware of an incident that involves bullying (including cyberbullying, prejudice-based and discriminatory bullying), physical abuse (which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), or hazing / initiation rituals or violence that does not involve a sexual component, they should report this to the relevant Head of Year(s) as soon as possible.
- This applies equally to incidents on the school site and those that happen offsite (eg at school fixtures or on school trips) and out of school hours (eg on public transport, online behaviour).
- The Head of Year will liaise with the relevant Head of Section (both of whom are Deputy Safeguarding Leads) who will make a judgement about whether a safeguarding or pastoral response is appropriate.
- The investigation will be led by the Head of Year, supported by the Head of Section.
- A record of the incident, victim, alleged perpetrator, witnesses, action taken and three-week follow up will be made in the Bullying Log by the Head of Year.
- When bullying or physical abuse is found, on the balance of probability, to have taken place, the perpetrator is likely to receive a serious sanction, as per the Behaviour and Sanctions policy.
- If there is a racist aspect to the incident, a Racist Incident Reporting Form will be completed and the incident will be dealt with according to the 'Responding to a Racist Incident' policy
- If there is a safeguarding concern the Head of Section will meet with the Designated Safeguarding Lead and a log will be made on MyConcern, alongside taking actions to safeguard the students involved.
- If there is a possibility that a criminal offence has been committed, the Head of Section will liaise with the Designated Safeguarding Lead and the police will be contacted.

Further details can be found in the [Anti-bullying Policy](#) and the [Responding to a Racist Incident Policy](#).

8.2.2.2 Responding to all other forms of Peer-on-Peer abuse including sexual violence

This section outlines the response to: relationship abuse; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images; non-consensual sexual activity; upskirting; initiation and hazing violence or rituals that include a sexual component.

The behaviours listed all fall under safeguarding, so a member of staff who becomes aware of an incident in any of these categories must inform the Designated Safeguarding Lead (or, in the absence of the DSL, a Deputy DSL) as soon as practically possible.

A more detailed explanation of the school's response to sexual violence and sexual harassment, including support for the alleged perpetrator, is outlined in the 'Allegations of Sexual Violence and Sexual Harassment between Pupils' policy.

All members of staff must know how to respond to a disclosure or report of these behaviours, as summarised below:

- If at all possible, speak to the student(s) with two members of staff present; one of them should be the Designated Safeguarding Lead or Deputy.
- Do not view or forward any illegal images of a child; instead confiscate relevant devices as soon as possible, to preserve evidence to hand to police.
- Do not promise confidentiality as it is very likely the concern will have to be shared further, for example with children's social care and/or the police. Tell the alleged victim who you will tell (eg DSL) and why; only share with those people necessary to progress it
- Listen carefully and non-judgementally. Use the child's own language and reflect back to them what you have understood. Be supportive and respectful; the disclosure has placed you in a position of trust.
- Be aware that some children may face additional barriers to telling because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- Avoid leading questions; use open questions (when, where, what). Staff can ask children if they have been harmed and what the nature of that harm was.
- Written notes are required. Record facts, not opinions. Remain engaged with child rather than distracted by note-taking (the second member of staff could make the notes, or you could write them immediately after the conversation). Notes of such reports can become part of a statutory assessment by children's social care and/or part of a criminal investigation
- Pass to DSL / DDSL as soon as possible if not already involved.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. 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 or have their experience minimised.

Risk Assessment

In response to an allegation of sexual violence the Designated Safeguarding Lead (or Deputy) will immediately complete a written (electronic) risk and needs assessment for relevant parties, including the victim, alleged perpetrator (pro-forma available on HOYS and Safeguarding Teams pages). This process will also consider whether there are other victims as well as the risks and needs of all the other children at the School, as well as adult students and staff, where appropriate. This risk assessment will be kept under review.

Action

In making decisions about the appropriate response, the DSL (and Deputies) will consider the following:

- the wishes of the victim in terms of how they want to proceed
- the duty to protect other children and any ongoing risks to the victim, other children, adult students or school or college staff;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children.
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Subject to these considerations, reports may be managed:

- Internally, through the school's pastoral and discipline systems (for example one-off incidents of sexual harassment)
- Through a referral to Early Help for the children involved, in addition to internal management, as above. For example, in cases of non-violent HSB.
- Through a referral to Children's Social Care if a child has been harmed, is at risk of harm or in immediate danger. This will happen alongside internal school processes to protect the victim and other children in the school, which will start immediately.
- By reporting to the police. This will happen whenever a report of sexual assault, sexual assault by penetration or rape is made, as guided by the National Police Chief Council's advice 'When to Call the Police'.

In every case, all concerns, discussions, decisions and reasons for decisions will be recorded on MyConcern.

Parents of the victim and alleged perpetrator will be informed about the incident and response, unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In cases where there is police involvement, the school will follow the advice of police about when information can be shared with parents and others.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school or college, the school will take disciplinary action against the individual who made it.

8.2.3 How victims of peer-on-peer abuse will be supported

For students who have not reported a concern / pastoral response to non-safeguarding peer-on-peer abuse concerns (eg bullying that doesn't meet a safeguarding threshold):

- Information for students about how to report peer on peer abuse, an internal online school reporting system for bullying and discrimination, as well as information about external agencies that can support pupils can be found on the Firefly welfare, safety and wellbeing pages. There is a 'report a concern button' on every students' Firefly dashboard which they can click to take them straight to this information page.
- Members of the School's pastoral team (tutors, Heads of Year and Heads of Section) are always available to meet with pupils to discuss any concerns or difficulties pupils may be experiencing.
- The School's pastoral team share concerns about pupils as required. This ensures that staff are aware of pupils who have experienced, or are experiencing, difficulties and able to support them appropriately.
- The School Nurses, School Counsellor and a Clinical Psychologist are available to see pupils who are experiencing difficulties.

For victims who have reported sexual violence:

- The School will cooperate fully with external agencies (e.g. children's services, the police and CAMHS) in ensuring that any pupil who has suffered peer on peer abuse receives the support they need.
- The school will signpost services that support survivors of sexual violence, including charities like Survivors UK (for boys and men) and Rape Crisis (for girls and women) and NHS services.
- The school will support the victim to access the support of a Independent Sexual Violence Advisor, to support them if appropriate.
- The victim will have access to regular meetings with a designated trusted adult in school – a person of their choosing from the pastoral or medical team to encourage open dialogue as well as providing ongoing support.

8.2.4 How alleged perpetrators of peer-on-peer abuse will be supported

This section outlines support for alleged perpetrators of sexual harassment and sexual violence.

- The school will consider the specifics of the case (eg the age and developmental stage, the nature of the allegations) when planning and considering the proportionality of the response, taking in to account the likely stress of being the subject of allegations and/or negative reactions of peers to such.
- Actions taken to support the alleged perpetrator will not compromise the safeguarding of the victim.
- The School recognises that the alleged perpetrator may have unmet needs, as well as potentially posing a risk of harm to other children; HSB, especially in younger children, may be a symptom of exposure to abusive practices or materials.
- Safeguarding support will be provided alongside any appropriate disciplinary action, up to and including permanent exclusion; these actions are not mutually exclusive.
- The school will take advice, as appropriate, from children's social care, specialist sexual violence services, and the police. In addition, other sources of advice will be considered (eg NSPCC, Stop It Now). This is with the aim of giving a perpetrator the correct support to try to prevent reoffending and address any underlying trauma that may be causing this behaviour.

- If an alleged perpetrator moves to another educational institution, for any reason, as well as passing on the safeguarding file, the Designated Safeguarding Lead will make the new institution aware of any ongoing support needs and, if appropriate, potential risks to other children and staff.

9. TRAINING

- All staff who work directly with children are required to read Part One of KCSIE at the start of every academic year and at any other time that there is a re-issue. Staff who do not work directly with children are required to read either Part One or Annex A. Staff are required to state that they have read and understood this content and the School's Safeguarding and Child Protection Policy. The DSL is responsible for ensuring this happens, and the records are kept centrally.
- All staff, including temporary staff and volunteers, will be provided with induction training that includes:
 - The requirement that they read and understand the School's Safeguarding and Child Protection Policy, and activities to support this (compulsory video and quiz).
 - The requirement that they read and understand the School's Staff Code of Conduct, the Behaviour and Sanctions Policy, and the whistleblowing procedure
 - Information about school procedures to deal with peer-on-peer abuse
 - Information about the safeguarding response to children who go missing from education.
 - Identifying and explaining the roles of both the Designated and Deputy Designated Safeguarding Leads
 - Being provided with a copy of
 - This policy
 - The Staff Code of Conduct
 - A copy of KCSIE Part 1 (or Annex A for staff who do not directly work with children)
 - The Whistleblowing Policy
 - The Behaviour and Sanctions Policy
 - The Staff Acceptable Use Policy
- All staff are required to attend appropriate safeguarding and child protection training, including online safety training, on appointment and subsequent refresher INSET at regular intervals, at least annually.
- Formal INSET for staff will be supplemented with at least annual informal updates (e.g. by email and staff meeting) as required.
- The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will attend appropriate biennial training provided by the Croydon Safeguarding Children Partnership in order to keep up to date with current knowledge in fulfilling their role. This includes training related to the governments' Prevent strategy.
- The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead must attend the training provided specifically for Designated Safeguarding Leads (designated persons), which includes training on inter-agency working, at least once every two years.
- The Designated Safeguarding Lead must ensure that all staff, including the Head, receive regular safeguarding training.
- The Headmaster must undergo the required child protection training and any additional training deemed necessary in order to understand safer recruitment procedures and processes, be able to apply them as a member of an appointment panel and to deal with

allegations made against members of staff and volunteers. All appointment panels will always include someone who has undertaken safer recruitment training.

- The Governor designated to oversee the School's Safeguarding and Child Protection Policy and the effective implementation of safeguarding practice will also receive appropriate safeguarding training.

10. ROLES AND RESPONSIBILITIES IN MANAGING SAFEGUARDING AND CHILD PROTECTION:

10.1 ALL STAFF:

All staff, which includes the Headmaster, teaching and support staff, including temporary staff and all volunteers, have a statutory responsibility to:

- Provide a safe environment in which children can learn;
- Be prepared to identify children who may benefit from early help, know the factors that increase vulnerability as set out in Part 1 (or Annex A for those who do not work directly with children) of Keeping Children Safe in Education, and be aware of the local process for early help and their role in it;
- Be aware of systems, policies and procedures within the School which support safeguarding:
 - The Safeguarding and Child Protection Policy
 - The Behaviour and Sanctions Policy
 - The Staff Code of Conduct
 - The Safeguarding Response to Children who go missing from education (Missing Pupil Policy)
 - The role and identity of the Safeguarding Lead and deputies;
- Be aware of the referral processes in relation to child welfare concerns, as set out in Part 1 and Annex A of Keeping Children Safe in Education ('What school and college staff should do if they have concerns about a child'), especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm), along with the role they might be expected to play in such assessments;
- Be aware that safeguarding issues can manifest themselves via peer-on-peer abuse, which is more likely to include, but may not be limited to: bullying, physical abuse, sexual violence, sexual harassment, sexting / youth produced sexual imagery, initiation / hazing rituals.
- Know what to do if a child tells them he/she is being abused or neglected and know how to manage the requirement to manage an appropriate level of confidentiality (see Section 5);
- Be aware of the signs of abuse and neglect so that they are able to identify children who may be in need of help or protection (see Appendix A);
- Work with the DSL and, if required, to support social workers to take decisions about individual children.
- Be aware that concerns relating to female genital mutilation should be reported to the Designated Safeguarding Lead (or Deputy), and that there is a specific legal duty on teachers to inform the police about any concerns about female genital mutilation.
- Refer safeguarding concerns or allegations made about other members of staff, including supply staff and volunteers, to the Headmaster, and concerns/allegations about the Headmaster to the Chair of Governors

- Raise concerns about poor or unsafe practice, and potential failures in the school's safeguarding regime with the Senior Management Team, and if concerns persist, through other whistleblowing channels.
- Make a direct referral to the relevant Safeguarding Children Partnership or the police immediately if, at any point, there is a risk of immediate serious harm to a child.

10.2 THE HEADMASTER:

- Ensure that the safeguarding and child protection policy and procedures adopted by the Governing Body are implemented and followed by all staff;
- ensure that all staff undergo safeguarding and child protection training (including online safety) at induction.
- Allocate sufficient time and resources to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Ensure that an environment exists with the School in which all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children is dealt with in accordance with the Whitgift Foundation's whistle blowing procedures;
- Ensure that children's safety and welfare, including online safety, is addressed through the curriculum.
- Ensure that when there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

10.3 DESIGNATED SAFEGUARDING LEAD:

The broad areas of responsibility for the School's Designated Safeguarding Lead, as per Annex C of Keeping Children Safe in Education 2021, are described below.

The Designated Safeguarding Lead is a member of the Senior Leadership Team and takes lead responsibility for safeguarding and child protection (including online safety).

This person should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and / or to support other staff to do so – and so to contribute towards the assessment of children.

10.3.1 Manage referrals

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service, as required;
- Refer cases where a crime may have been committed to the Police as required.

10.3.2 Work with Others

The designated safeguarding lead is expected to:

- Act as a point of contact with the three safeguarding partners (local authority, clinical commissioning group, police);
- Liaise with the Headmaster to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the “case manager” and the LADO (Local Authority Designated Officer) for child protection concerns (all cases which concern a staff member);
- Liaise with staff (especially pastoral support staff, school nurses, IT technicians, Head of Learning Support and Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- Act as a source of support, advice and expertise for staff

10.3.3 Training

The Designated Safeguarding Lead and Deputies will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The Designated Safeguarding Lead will undertake Prevent awareness training.

In addition, the Designated Safeguarding Lead and Deputies will, at regular intervals, as required but at least annually, refresh their knowledge and skills (eg via e-bulletins, meeting other safeguarding leads or by taking time to read and digest safeguarding developments) so as to keep up with any developments relevant to their role in order to:

- Understand the assessment process for providing early help and 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;
- Ensure each member of staff has access to and understands the School’s child protection policy and procedures, especially new and part time staff;
- Be alert to the specific needs of children in need, those with special educational needs and young carers;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- Understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners;
- Be able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support staff on protecting children from the risk of radicalisation;

- Are able to understand the unique risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online:
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

10.3.4 Raising Awareness

The Designated Safeguarding Lead shall

- ensure that the School's child protection policies are known, understood and used appropriately;
- ensure the School's Safeguarding and Child Protection is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Governors regarding this;
- ensure the child protection policy is available publicly and parents 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 training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. This may include ensuring that staff know who these children are, understand their academic progress and attainment, and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments they could make to best support these children.

10.3.5 Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date and that information is stored securely and kept confidential (only sharing in line with information sharing advice set out in Keeping Children Safe in Education).

Records should 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.

Where children leave the school (including for in-year transfers) the Safeguarding Lead will ensure their child protection file is transferred to the new school or college as soon as possible and within 5 days of the transfer (in year) or start of new school year. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of

receipt should be obtained. When students join the school, the Safeguarding Lead will ensure safeguarding files or nil returns are received from the previous school and share relevant material with the Head of Learning Support.

The Safeguarding Lead will consider whether it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have support in place for when the child arrives.

10.3.6 Availability

The Designated Safeguarding Lead or Deputies are available to discuss matters of concern with pupils, staff and parents throughout the school day.

During any period of remote provision, members of the Safeguarding Team will continue to be available to deal with concerns raised by staff, students, parents or others about the safety and welfare of children, to provide advice to colleagues who have concerns about children or about the behaviour of staff or volunteers towards children, to record and update concerns using the online record keeping system and to make referrals to Children's Services or other outside agencies as appropriate. Usually Teams will be used for communication during remote provision. However, should there be a requirement for a member of the Safeguarding Team to be in school to deal with an issue in person, it will usually be possible for the Safeguarding Lead to travel to the school at short notice to complete the tasks required.

In the event of an out of hours enquiry, the DSL can be reached by phoning the mobile number provided in section 4 of this document. It should be noted, however, that this is not an emergency 24-hour on-call system, and there will be times when it is not possible for the phone to be answered immediately. If the concern is urgent, relating to a young person who may be at immediate risk of harm, the advice is to call 999. See Section 5.1 for further details.

10.4 DEPUTY DESIGNATED SAFEGUARDING LEADS:

The DDSLs have been trained to the same level as the Designated Safeguarding Lead. The Designated Safeguarding Leads have the status and authority within the School to carry out the duties of the Safeguarding Lead in his/her absence and are authorised to commit resources and support and direct staff as appropriate.

In the absence of the DSL, the functions of the DSL will be carried out by one of the DDSLs. However, the ultimate lead responsibility for child protection remains with the Designated Safeguarding Lead and this responsibility will not be delegated.

In this policy, reference to the DSL includes the deputy DSL where the DSL is unavailable.

10.5 GOVERNORS:

Governors of both the School and the Court recognise their overall responsibility to ensure compliance with child protection statutory requirements. Governors take seriously their responsibility of duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. The reporting of safeguarding practice at the School enables Governors to ensure compliance with current legislation and to identify areas for improvement. Governors recognise that close liaison with the local authorities is also vital in order that appropriate support and training can be given.

Governors will ensure that:

- They facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy.
 - Child Protection policy and procedures are in accordance with the Croydon Safeguarding Children Partnership guidance;
 - All staff undergo safeguarding and child protection training (including online safety) at induction.
 - That systems are in place, and well promoted, easily understood and easily accessible , for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
 - That when there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
 - The school operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff, including supply staff, and volunteers who work with children;
 - There are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children.
 - They do all that they reasonably can to limit children's exposure to risks from the school's or college's IT system. This includes ensuring the school has appropriate filters and monitoring systems in place.
 - The Safeguarding and Child Protection policy contains key information about procedures and attitudes to minimise the risk of peer-on-peer abuse, recognise this behaviour when it does occur and manage incidents appropriately when they do occur.
 - They undertake an annual review of the school's child protection policy and procedures and of the efficiency and effectiveness with which the related duties have been discharged. The review may be conducted in the first instance by the Welfare sub-committee, but the annual approval of the policy is given by a full meeting of the governing body.
 - The school has procedures for dealing with allegations of abuse against staff, including supply staff, and volunteers that comply with agreed Croydon Safeguarding Children Partnership's procedures.
-
- Relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

The Chair of the Trinity School Committee is responsible for liaising with the local Authority Allegations manager/ lead officer for Child Protection in the event of allegations of abuse being made against the Headmaster.

11. SUPPORTING STAFF

- The School recognises that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

- The School will support such staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and to seek further support, if required.

12. HOMESTAY ARRANGEMENTS DURING EXCHANGE VISITS

12.1 SUITABILITY OF ADULTS IN UK HOST FAMILIES

When arranging a homestay, the school will consider the suitability of the adults in the families who will be responsible for the visiting child during the stay. Where the school has arranged for a visiting child to be provided with care and accommodation in the home of a family to which the child is not related, the responsible adults will be engaging in regulated activity for the period of the stay, and where the school has the power to terminate such a homestay, the school is the regulated activity provider. Therefore, the school will obtain a DBS enhanced certificate with barred list information in order to establish whether the adults are barred from engaging in regulated activity relating to children and to consider in cases where criminal record information is disclosed, alongside other intelligence obtained, whether the adult will be a suitable host for a child. The school will also consider whether it is necessary to obtain a DBS enhanced certificate in respect of others aged 16 and over in the household where the child will be staying.

12.2 SUITABILITY OF ADULTS IN HOST FAMILIES ABROAD

It is not possible for the School to obtain criminality information from the DBS about adults who provide homestays abroad. The School will liaise with partner schools abroad, to establish a shared understanding of, and agreement to, the arrangements put in place for the visit. Professional judgement will be used to decide whether the arrangements are appropriate and sufficient to safeguard effectively every child who is taking part in the exchange. The risk assessment for each homestay trip will outline the measures agreed to safeguard Trinity pupils (eg daily contact with school staff, emergency contact phone numbers so pupils know who to contact should a situation arise that makes them feel uncomfortable or unsafe). Parents will be made aware of the agreed arrangements. The School will consider whether it is necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestays outside of the UK.

13. ONLINE SAFETY

- The use of technology has become a significant component of many safeguarding issues e.g. child sexual exploitation or radicalisation. Technology often provides the platform that facilitates harm and the School is aware that there are four areas of risk associated with online safety:
 - content: being exposed to illegal, inappropriate or harmful material, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
 - contact: being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - conduct: personal online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams
- The School acknowledges that our pupils will use mobile devices and computers and recognises that they are important tools for communication and education as well as for recreation and socialising. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing children to engage in harmful conversations, webcam photography or face-to-face meetings.
- The School takes a whole school approach to online safety, ensuring online safety is a running and interrelated theme when devising and implementing policies and procedures and seeking to protect and educate the whole school community in their use of technology and has in place filters and monitoring systems to identify, intervene and escalate any incident where appropriate.
- The School proactively monitors and filters online activity by using commercial products: 'Smoothwall' and Cisco and Senso. These products block staff and pupil access to inappropriate sites e.g. gambling and pornography and provide reports of any attempts by pupils and/or staff to access inappropriate sites. The list of sites blocked by these filters are routinely updated by the service providers.
- The School's Code of Conduct and ICT Acceptable Use Policy explains the responsibilities of staff in relation to keeping children safe while online (whether in school or not) and educates both staff and pupils in online-safety.
- Pupils receive guidance on the safe use of the internet (including anti-bullying) through the Computing and Personal Development curricula and in year group assemblies. The School is committed to ensuring that its pupils are aware of the dangers associated with the use of online technology so that they are equipped with the necessary skills to stay safe at all times, whether at school or not. An annual visit by a company with expertise in this area (eg Digital Awareness UK, Childnet) ensures key staff are updated on current threats, and forms part of the education of Lower School students. Parents are also invited to a seminar presented by the external provider at this time.
- The School recognises that 4G and 5G technology enables pupils to access the internet while not connected to the School's local area of wireless network. This access means some children, whilst at school, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. The school takes the following measures to enhance the online safety of pupils:
 - Students in the Sixth Form may have mobile phones with them at school, but these must be switched off during lessons and other activities
 - Boys in the Lower School and Middle School are required to keep their mobile telephones in their lockers during the day (including break and lunch) and must have permission from a member of staff before using them. Use will only be granted for vital calls e.g. to parents.
 - Educating students about the legal and personal consequences of sharing indecent images, sexual harassment, and harmful online content, including pornography, through the tutorial system, the Personal Development curriculum and the Sixth Form Diploma course.
- Cyber-bullying by children, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through our Anti-Bullying Policy and procedures.

(See 'Online Safety Policy' and 'Staff, Pupil and Visitor Acceptable Use Policies' for further details)

Additional information to support online safety (including when children are online at home) is provided in Annex C of Keeping Children Safe in Education.

14. SAFER RECRUITMENT

- The School is committed to safer recruitment and all necessary pre-employment checks will be carried out in accordance with Department for Education guidance (as found in 'Keeping Children Safe in Education 2021') and the Croydon Safeguarding Children Partnership. At least one person on every recruitment panel will have received 'Safer Recruitment' training. (See '[Recruitment and Selection Policy](#)' for further details)

15. SECURE PREMISES

- School premises: The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.
- Visitors' book and identification badges: The School keeps a visitors' book at Reception. All visitors (including parents and Governors) must sign in on arrival and sign out on departure. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises.
- Staff photographs: photographs of all teaching and support staff are publicly displayed near the School's reception area.

16. USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

When facilities are rented to other organisations or individuals, such as community groups or sports associations that are not under the direct supervision or management of school staff, the safeguarding and child protection policies and procedures of that external organisation will be checked as part of the hiring agreement, and arrangements will be made to that liaison with the School can happen as appropriate. These checks and arrangements will be part of the hire agreement as a condition of use of the premises and failure to comply will result in the termination of the agreement.

17. ANTI-BULLYING

Our policy on the prevention and management of bullying is set out in our [Anti-Bullying Policy](#) and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. Staff are aware that bullying can take place online and that social media can be used to perpetrate acts of cyberbullying. Bullying will be treated as a safeguarding issue should there be reasonable cause to believe a child is at risk or likely to suffer significant harm as a result.

The school community will therefore:

- Establish and maintain an ethos, which is understood by all staff, which enables children to feel secure and encourages them to talk knowing that they will be listened to.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty. Information about this is provided on every classroom wall and on student Firefly pages.

- Record incidents of bullying that are reported to any member of staff, or that are witnessed by any member of staff.
- Provide across the curriculum, opportunities which equip children with the skills they need to stay safe from harm, including when accessing the internet, and to know to whom they should turn for help.

(See 'Anti-Bullying Policy' and 'Online Safety Policy' for further details)

18. PHYSICAL INTERVENTION/POSITIVE HANDLING AND 'REASONABLE FORCE'

- 'Reasonable force' refers to a broad range of actions used by staff that involve a degree of physical contact to control or restrain children, and 'reasonable' means 'using no more force than is needed'. The decision on whether to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.
- In incidents involving children with SEN or disabilities or with medical conditions, the risks should be considered carefully, recognising the additional vulnerability of these groups. Duties under the Equalities Act (2010) in relation to making reasonable adjustments, non-discrimination and equality duties should be considered, and where possible planned positive and proactive behaviour support should be in place to reduce the likelihood of an incident.
- The School's guidance is that that staff must only ever use physical intervention as a last resort, e.g. when a child is endangering him/her or others and that, at all times it must be the minimal force necessary to prevent injury to another person.
- Such events should be recorded in writing by the member of staff who intervened and counter-signed by a witness. Incidents involving the use of restraint should be reported to the Deputy Headmaster or, in his absence, to the Head of Upper School. The Deputy Headmaster will inform the parents of the pupil(s) who needed to be physically restrained and may refer such incidents to the Designated Safeguarding Lead.
- We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

(See 'Staff Code of Conduct' for further details)

19. PHOTOGRAPHY AND IMAGES

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images. To protect our pupils, we seek parental consent to take photographs of their children. We will take seriously concerns raised by any parents, pupil or member of staff if they are worried about any photograph that has been taken of any member of the School community.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

From time-to-time professional photographers are invited into the School to take group photographs or pictures of significant events; any professional photographers hired by the School will be subject to appropriate vetting checks.

Students are not allowed to take photographs or video footage (on the school site or off-site during school trips) of other members of the school community (including staff and parents) without the express permission of the individual(s) concerned.

Expectations of staff are made clear in *The Staff Code of Conduct*

CCTV is located around the School but is not installed in classrooms, changing rooms or toilet areas. The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.

(See 'CCTV System Policy' for further details)

20. HEALTH & SAFETY

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the school environment and, for example, in relation to internet use, and when away from the school when undertaking school trips and visits.

(See 'Health and Safety Policy' for further details)

21. PASTORAL AND SAFEGUARDING EDUCATION

The School promotes the welfare of children through the assembly programme, Personal Development curriculum, the Computing curriculum and parent meetings.

(See 'Personal Development Policy' and 'Relationships and Sex Education Policy' for further details)

Pupils at Trinity School receive guidance on a wide range of topics relating to their health, safety and wellbeing from their tutors (during Form Periods), Heads of Year (during assemblies), visiting speakers and in Personal Development lessons.

Matters discussed include: online safety, first aid, transport safety, knife-crime, drugs and substance misuse, relationships and sex education (including consent), bullying, peer pressure, homophobia and hate crimes, stress and mental health.

22. ANTI-RADICALISATION AND PREVENTING PUPILS FROM BEING DRAWN TO TERRORISM

The School is committed to safeguarding its pupils from radicalisation/ extremism and preventing them from being drawn to terrorism. Staff will use their judgement in identifying children who might be at risk of radicalisation and pass concerns to the Designated Safeguarding Lead or Deputies.

The School is equally committed to working with relevant sectors and institutions if it is discovered that a member of the School's community is in danger of becoming/ has become radicalised or has been/ is in danger of being drawn to terrorism.

Referrals can be made to Mr Haydar Muntadhar, Croydon's Prevent Manager. Tel: 0208 726 6000 (ext. 88974), 07562 438898

Haydar.Muntadhar@croydon.gov.uk; Channel@croydon.gov.uk

or to safercroydon@croydon.gov.uk

The police have Prevent Engagement Officers (PEOs) who work with the public and partner agencies to prevent terrorism and violent extremism from taking root in our communities. These officers aim to safeguard individuals and institutions from all forms of terrorist ideology and work closely with partner agencies such as local authorities, schools, Universities and health institutions, to ensure communities in Surrey are well placed to report and respond to terrorist related concerns.

The Police can be contacted to find out more around the Prevent strategy or to express concerns about links to terrorism or violent extremism. (*See [Prevent and Anti-Radicalisation Policy for further details](#)*)

All guest speakers invited to address pupils, staff and/or parents will be approved by the Headmaster in advance of arriving onsite. The Headmaster will assess the suitability of all guest speakers, at all times paying due regard to Prevent Duty guidance, and reserves the right to cancel the appearance of any guest speaker if he has any reservations as to their suitability to address any members of the school community.

23. ATTENDANCE

The School recognises that a child going missing from education is a potential indicator of abuse or neglect and has in place procedures to follow up on unauthorised absences.

The legal framework governing school attendance is summarised in *School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities* (2013), published by the Department for Education (DfE) <https://www.gov.uk/government/publications/school-attendance>

The School also complies with guidance published by the Independent Schools' Inspectorate (ISI) and advice published by the Croydon Local Education Authority (LEA), regarding school attendance, which can be found by following this link: www.croydon.gov.uk/education/schools-new/attendance.

Parents or guardians are required to ensure that their children receive efficient, full-time education. Schools are responsible for recording pupil attendance twice a day; once at the start

of the morning session and once during the afternoon session. Attendance at Trinity is monitored through such registration, and a record is kept.

Pupils are encouraged to take full advantage of their educational opportunities through maximum attendance, and are expected to attend all prescribed lessons and activities. Parents and teachers have a duty to ensure that pupils attend school for every school day except in the case of illness or if prior permission for absence has been granted.

(See 'Attendance Policy' and 'Missing Pupil Policy' for further details)

24. DATA PROTECTION

Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children. *(See Data Protection Policy for further details)*

Information stored and shared for safeguarding purposes by the School is treated as 'special category personal data'. It can be shared without consent when there is good reason to do so and the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that consent should be gained or if to gain consent would place a child at risk.

Pupil's personal data should not be provided where the serious harm test under the legislation is met (eg where a child is in a refuge or other emergency accommodation); data must be withheld in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. When in doubt, the School will seek independent legal advice.

Part Two of Keeping Children Safe in Education 2021 has links to further sources of guidance on information sharing.

25. POLICY REVIEW

The Trinity School Committee is responsible for ensuring the annual review of this policy and will scrutinise both the effectiveness of the procedures included in the policy and their implementation. Where deficiencies are observed in policy and procedures before the annual review, the Designated Safeguarding Lead and Senior Deputy Head shall ensure that these are remedied as soon as possible and an updated policy will be presented to the Headmaster, who will request interim approval from the Chair of the Trinity School Committee and the nominated governor for child protection and safeguarding.

The School's Safeguarding and Child Protection Policy will be reviewed annually in September and additionally if there are changes to the regulations at other times of the year. In addition, the Head of Human Resources of the Whitgift Foundation will work with the School to ensure the policy and processes in it reflect any changes in the regulations, particularly with regard to staff. The School will draw on the expertise of staff in shaping the safeguarding arrangements and policies, to ensure that the School considers at all times what is in the best interests of its pupils.

The School’s Safeguarding and Child Protection Policy will then be reviewed by the Welfare Committee and referred to the Trinity School Committees for scrutiny before being submitted to the Education Committee of the Whitgift Foundation, where any amendments to the policy to reflect changes in the legislation will be highlighted. The Education Committee will have a standing agenda item of ‘Safeguarding’ to review any changes to the policy and any other significant safeguarding issues that have occurred within the School.

The Court will have a standing agenda item of ‘Safeguarding’ on its agenda to ratify the School’s Safeguarding and Child Protection Policy, which will be attached to committee papers of the December meeting and any changes highlighted and discussed at the meeting, and to discuss any other significant safeguarding issues that have occurred within the School. The examination and ratification of the Safeguarding and Child Protection Policy, and a note of any discussion points, will be carried out by the Court.

Author / Reviewer:	Sara Ward (Pastoral Deputy Head, DSL)
Date of last review:	August 2021
Policy approved by:	Senior Management Team
Date of Approval:	August 2021
Date of next Review:	August 2022
Governor committees responsible for oversight:	Trinity School Committee and Welfare Sub-Committee

APPENDIX A – ABUSE

Definition of Abuse from Keeping Children Safe in Education 2021

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

A child is considered to be abused or at risk of abuse when the basic needs of the child are not being met through avoidable acts of either commission or omission. The harm includes neglect, ill-treatment, physical, sexual or emotional abuse, impairment of physical or mental health or impairment of physical, intellectual, emotional or social development. All members of staff should familiarise themselves with the typical signs and symptoms as set out below

General Indicators of Child Neglect and Abuse

There are a number of indicators that have been put forward by professionals in the field of child protection in order to raise awareness in those who are working on a daily basis with children and their families. The following lists have indicators which apply to children and their parents.

Parents who may neglect or abuse their children may exhibit the following:

- Rejection of the child
- Rough handling of the child
- Failure to keep appointments with child care staff
- Frequent visits to the medical services with trivial complaints about the child or themselves

Children who may be suffering from neglect or abuse may exhibit the following:

- Unexplained failure to thrive
- Injuries that are inconsistent with the accident as described by the parents
- Frequent bruising, cuts, burns, etc.
- Frozen awareness, when the child carefully watches adults' expressions and movements
- Reluctance to be alone with their carer/s (e.g. teacher/ coach)
- Sudden unexplained changes in their reactions towards their carer/s

Not all children who have been neglected or abused will show all, or any, of these indicators, and one indicator alone may not denote that a child is being abused. A number of children may exhibit "failure to thrive" and doctors may not be able to find any reasonable explanation for this but this does not necessarily indicate that they have been a victim of abuse. A child with a combination of indicators who has a parent who is also exhibiting one of more of the adult indicators could lead a carer to suspect that they may be dealing with a case of abuse or neglect.

In the area of child sexual abuse there is a different set of indicators; most of these are related to the behaviour of the child:

- Sudden changes in personality, such as wanting constant attention and reassurance
- Lack of trust of a familiar adult
- Aggressive or compliant behaviour
- Withdrawal, listlessness, sadness
- Fear of being alone
- Showing affection in a sexual way inappropriate to their age
- Eating problems, loss of appetite, problems swallowing, excessive eating

Specific Indicators of Various Forms of Child Neglect and Abuse

5) Neglect:

Physical Indicators

- Poor hygiene
- Inadequately clothed, dirty, torn or inappropriate clothing
- Untreated medical problems
- Poor nourishment/failure to thrive
- Emaciation

Behavioural Indicators

- Tired or listless
- Low self-esteem
- Always hungry
- States that there is no one at home to look after them or indicates that they spend a lot of time at home alone

b) Physical Abuse:

Physical Indicators

- Unexplained bruising in places where an injury cannot easily be sustained or explained
- Facial bruising
- Hand or finger marks or pressure bruising
- Bite marks
- Burns (particularly cigarette burns), scalds
- Unexplained fractures
- Lacerations or abrasions

Behavioural Indicators

- Shying away from physical contact
- Withdrawn or aggressive behaviour
- Sudden changes in behaviour, e.g. from extrovert to introvert

c) Sexual Abuse:

Physical Indicators

- Bruises or scratches inconsistent with accidental injury
- Difficulty in walking or sitting
- Pain or itching in the genital area
- Torn, stained or bloody underclothes
- Loss of appetite

Behavioural Indicators

- Sexually precocious, uses seductive behaviour towards adults
- Uses sexually explicit language
- Excessive preoccupation with sexual matters
- Informed knowledge of adult sexual behaviour
- Poor self-esteem
- Withdrawn or isolated from other children

d) Emotional Abuse:

- Attention seeking
- Withdrawn
- Telling lies

- Inability to have fun
- Low self-esteem
- Tantrums past the age when they are part of normal development
- Speech disorders e.g. stammering
- Inability to play
- Indiscriminately affectionate

Annex B of Keeping Children Safe in Education 2021, has further information on the following Safeguarding risks

- Child abduction and community safety incidents
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County lines
- Modern Slavery and the National Referral Mechanism
- Cybercrime
- Domestic abuse
- Homelessness
- So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)
- FGM
- Forced marriage
- Preventing radicalisation
- The Prevent duty
- Channel
- Additional Support
- Peer on peer/ child on child abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Upskirting
- The response to a report of sexual violence or sexual harassment

APPENDIX B – ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

Actions where there are concerns about a child



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

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

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

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

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

APPENDIX C – USEFUL CONTACTS

Headmaster:	Alasdair Kennedy 0208 656 9541 hmsec@trinity.croydon.sch.uk
Designated Safeguarding Lead (DSL):	Sara Ward 0208 656 9541 07540 691099 slw@trinity.croydon.sch.uk
Deputy Designated Safeguarding Leads (DDSL):	Rebecca Petty 0208 656 9541 rp@trinity.croydon.sch.uk Sam Powell 0208 656 9541 sxp@trinity.croydon.sch.uk Antonia Geldeard 0208 656 9541 azg@trinity.croydon.sch.uk
Chair of Trinity School Committee: (Member of the Whitgift Court of Governors and Child Protection governor for the School)	Mr David Seymour seymourdavid1@yahoo.co.uk
Chair of the Whitgift Foundation:	Chris Houlding 0208 680 8499
Lead Safeguarding Governor for the Whitgift Foundation	Jo MacKenzie 0208 680 8499
Local Police	Heathfield Safer Neighbourhood Team 0208 721 2468 croydonheathfield.snt@met.police.uk
Metropolitan Police Prevent Engagement Officer	Harvey Teague 07766 206451

Local Authority Designated Officer (LADO):	Senior LADO: Steve Hall LADO: Jane Parr Business Support Officer: Karen Anns Direct line: 020 8255 2889 lado@croydon.gov.uk
NSPCC whistleblowing helpline	0800 028 0285
NSPCC (Report Abuse)	www.nspcc.org.uk/what-you-can-do/report-abuse
Croydon's Hate Crime and Prevent Coordinator	Haydar Muntadhar haydar.muntadhar@croydon.gov.uk 0208 726 6000 (ext. 88974)
DfE Counter-Extremism Helpline	0207 340 7264 counter.extremism@education.gsi.gov.uk
Early Help Contact	Christine Evelyn Central Locality Team Manager Early Help and Children's Social Care Turnaround Centre 51-55 Southend Croydon CR0 1BF Tel: 020 8726 6400 Ext 60617 Mobile: 07436035051 Christine.evelyn@croydon.gov.uk
Forced Marriage Unit	0207 008 0151 fmufco.gov.uk

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