



Child Protection and Safeguarding Policy

Applies to:	Fidelis College, including EYFS, Prep, Senior School and Sixth Form; students aged 4–19
Policy availability:	Website / internal
Approved by:	Board of Trustees
Policy owner:	Head of College
Operational lead:	Designated Safeguarding Lead
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Next review:	August 2027

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Changes to this version

This policy replaces the policy approved in May 2026 and has been substantially revised for implementation from 1 September 2026.

The principal changes are:

- full alignment with *Keeping Children Safe in Education 2026*;
- alignment with *Working Together to Safeguard Children 2026* and the developing Family Help model;
- clearer alignment with Part 3, paragraph 7 of the Education (Independent School Standards) Regulations 2014 and the current ISI inspection framework;
- confirmation that all staff must read Part One of KCSIE in full;
- strengthened arrangements for DSL and deputy DSL cover;
- clearer expectations for safeguarding records and the transfer of child protection files;
- strengthened procedures concerning child-on-child abuse, harmful sexual behaviour, sexual violence and sexual harassment;
- inclusion of AI-generated intimate images within arrangements for nudes and semi-nudes;
- strengthened expectations concerning racism, misogyny, misandry and harmful online influences;
- clearer links between mental health and safeguarding;
- specific provision concerning students with SEND, medical conditions and young carers;
- separate provision concerning students who are lesbian, gay or bisexual and students who are questioning their gender;
- strengthened online-safety, cyber-security, filtering and monitoring arrangements;
- confirmation that the College is a mobile-phone-free environment by default during the school day, subject to approved exceptions;
- closer integration between safeguarding and attendance, children absent from education and children missing education;
- clearer arrangements for allegations against adults and low-level concerns, aligned with the College's separate Managing Allegations Against Staff and Low-Level Concerns Policy;
- clearer links with the College's Recruitment and Safer Recruitment Policy, Staff Code of Conduct, Online Safety Policy, Restrictive Interventions Policy and wider safeguarding policy framework; and
- specific consideration of the College's EYFS provision and students aged 18 or 19.

College context, Catholic ethos and safeguarding culture

Fidelis College is an independent, Catholic, co-educational College for students aged 4–19.

Our vision is:

To form young people of academic excellence, character and integrity who shape society through service, joy and responsibility.

Our motto is:

In gaudio serviamus – Joyfully we serve.

Our principal virtues are:

Joyful | Responsible | Courageous

Safeguarding is fundamental to the mission of Fidelis College. Our Catholic foundation affirms the inherent and unique dignity and worth of every person. Protecting children from harm, listening to them, acting upon concerns and creating an environment in which they can flourish are therefore integral to the educational and pastoral responsibilities of the College.

The College seeks to sustain a culture of informed vigilance in which:

- the welfare and best interests of the child are central;
- safeguarding is understood to be everyone's responsibility;
- staff maintain an attitude that it could happen here;
- concerns are identified and acted upon early;
- children are listened to and taken seriously;
- adults exercise appropriate professional curiosity;
- reporting concerns is regarded as responsible professional conduct;
- poor or unsafe practice is challenged;
- professional boundaries are understood and maintained;
- safeguarding is considered online as well as offline and inside and outside the home;
- discrimination, racism, bullying, sexual harassment, violence and abuse are challenged;
- staff recognise that several different harms or needs may affect a child simultaneously; and
- safeguarding practice is regularly scrutinised, tested and improved.

The College works closely with parents as the primary educators of their children. That partnership is important to safeguarding. However, where sharing information with a parent would place a child at increased risk, interfere with a safeguarding enquiry or otherwise be contrary to the child's welfare, the College will act in accordance with its statutory safeguarding responsibilities.

Important safeguarding contacts

Designated Safeguarding Lead (DSL)

Ben Rix

Email: brix@fidelis.org.uk

Safeguarding email: dsl@fidelis.org.uk

Emergency safeguarding telephone: 07955 888845

Deputy Designated Safeguarding Leads

- Dr Andy Taylor
- Mrs Sophia Corpas
- Ms Candela Marquez
- Ms Frankie Scott
- Mrs Elizabeth Galbraith
- Mrs Laura Sardina
- Mr Evrard Loembe
- Mr Callum Stephens

Safeguarding Trustee

Ita Murphy

Chair of the Board of Trustees

Ita Murphy

Croydon Children's Social Care / Multi-Agency Safeguarding Hub

Telephone: 020 8255 2888, Monday to Friday, 9.00am–5.00pm

Out of hours Emergency Duty Team: 020 8726 6400

In an emergency where a child is in immediate danger: 999

Croydon Local Authority Designated Officer (LADO)

Email: LADO@croydon.gov.uk

Croydon Council: 020 8726 6000

The College will verify the current named LADO and direct contact details from Croydon Council at each annual policy review. Current LADOs for Croydon are Jane Rowe (previously Parr) and Steve Hall.

Croydon Prevent / Channel

Email: channel@croydon.gov.uk

Police

Emergency: 999

Non-emergency: 101

All external contact information will be checked regularly by the DSL. Current local procedures and referral routes take precedence if contact arrangements change between formal policy reviews.

Purpose and aims

The purpose of this policy is to establish clear arrangements for safeguarding and promoting the welfare of children at Fidelis College.

The College aims to ensure that:

- appropriate action is taken promptly to safeguard children and promote their welfare;
- all staff understand their individual safeguarding responsibilities;
- children know how and where to seek help;
- staff identify abuse, neglect, exploitation and other safeguarding concerns;
- early help and Family Help are considered where needs are emerging;
- referrals to statutory services are made without avoidable delay where necessary;
- safeguarding information is recorded, shared and transferred appropriately;
- safer recruitment and suitability arrangements minimise the risk of unsuitable adults gaining access to children;
- child-on-child abuse is prevented, challenged and responded to effectively;
- children are protected from online harm;
- students with additional vulnerabilities receive appropriate protection and support;
- allegations and concerns about adults are dealt with appropriately;
- safeguarding is integrated with attendance, behaviour, pastoral care, SEND, mental health and curriculum provision; and
- the Board of Trustees receives sufficient assurance to hold leaders to account for the effectiveness of safeguarding.

This policy applies to all staff, trustees, volunteers, supply and agency staff, trainee teachers, contractors and other adults working in or on behalf of the College.

It applies to College activities on and off site, including educational visits, transport arrangements, remote education, alternative provision and College-organised activities outside normal hours.

Statutory, regulatory and inspection framework

This policy has been prepared with regard to the current versions of:

- *Keeping Children Safe in Education 2026*;
- *Working Together to Safeguard Children 2026*;
- the Education (Independent School Standards) Regulations 2014, as amended, particularly Part 3, paragraph 7 concerning safeguarding and promoting students' welfare and Part 4 concerning the suitability of staff, supply staff and proprietors;
- current Department for Education guidance on the Independent School Standards;
- the Children Act 1989 and Children Act 2004;
- the Safeguarding Vulnerable Groups Act 2006, as amended;
- the Protection of Freedoms Act 2012;
- the Police Act 1997;
- the Rehabilitation of Offenders Act 1974 and applicable Exceptions Orders;
- the Crime and Policing Act 2026, where relevant to regulated activity and safeguarding arrangements;
- the Sexual Offences Act 2003, including provisions concerning abuse of positions of trust;
- the Female Genital Mutilation Act 2003 and Serious Crime Act 2015;
- statutory multi-agency guidance on female genital mutilation;
- the Domestic Abuse Act 2021;
- statutory Operation Encompass guidance;
- the Counter-Terrorism and Security Act 2015 and current Prevent duty guidance;

- the Equality Act 2010;
- the Human Rights Act 1998;
- the Childcare Act 2006 and Childcare (Disqualification) Regulations 2018 where applicable;
- the statutory framework for the Early Years Foundation Stage;
- the School Attendance (Pupil Registration) (England) Regulations 2024;
- current statutory and Department for Education guidance concerning children absent from education and children missing education;
- current statutory guidance concerning mobile phones in schools;
- UK GDPR;
- the Data Protection Act 2018, as amended;
- the Data (Use and Access) Act 2025; and
- relevant local multi-agency arrangements published by Croydon's safeguarding partners.

The College also has regard to relevant Catholic safeguarding expectations and the standards and guidance of the Catholic Safeguarding Standards Agency where applicable to the College.

The College is inspected by the Independent Schools Inspectorate. ISI evaluates whether the Independent School Standards and other applicable standards are met and states expressly whether a school's safeguarding practice meets required standards. The effectiveness of safeguarding therefore depends not simply upon the existence of this policy but upon its consistent implementation in practice.

This policy is intended to apply from 1 September 2026. Until 31 August 2026, *Keeping Children Safe in Education 2025* remains the statutory version in force.

Definitions

Safeguarding and promoting the welfare of children

Safeguarding and promoting the welfare of children means:

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

Child protection

Child protection forms part of safeguarding and refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Harm may occur:

- within the home;
- outside the home;
- between children;
- within the wider community;
- through organised or criminal networks; or
- online.

Child

For statutory child-protection purposes, a child is anyone under the age of 18.

Parent

For the purposes of this policy, parent includes a natural parent, a person with parental responsibility and, where appropriate, a person who has day-to-day care of the child.

Abuse

Abuse is a form of maltreatment. A child may be abused by inflicting harm or by failing to act to prevent harm.

Abuse may be perpetrated by adults or children and may include physical abuse, emotional abuse, sexual abuse and neglect, as well as exploitation, domestic abuse, child-to-parent or caregiver abuse and other forms of harm described in this policy.

Exploitation

Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into activity from which others benefit. It may be sexual, criminal, financial or otherwise and may occur even where the child appears to consent.

Nudes and semi-nudes

Making or sharing nudes or semi-nudes includes photographs, videos, live streams and images that have been digitally altered or wholly generated using artificial intelligence but appear to depict a real child or person.

Every incident involving a child making or sharing a nude or semi-nude image requires a safeguarding response, whether the sharing appears consensual or non-consensual.

Students aged 18 or 19

Some Sixth Form students are adults in law.

The College maintains a duty of care towards all current students. Where a student aged 18 or 19 raises a welfare concern, the College will respond appropriately and provide pastoral support.

Where an adult student:

- has needs for care and support;
- is experiencing or is at risk of abuse or neglect; and
- is unable, as a result of those needs, to protect themselves,

the DSL will consider referral under adult safeguarding arrangements, including the Care Act 2014.

A disclosure made after a student reaches 18 may concern abuse that occurred during childhood. Such information will be taken seriously and referred to the police, children's social care, adult safeguarding services or other agencies as appropriate.

Safeguarding principles and equality

Every child is entitled to protection from harm.

The College recognises that children do not experience risk equally. Some children may face additional barriers to recognising, resisting, reporting or recovering from abuse.

Particular consideration will be given to children who:

- have SEND or disabilities;
- have medical or physical health conditions;
- are young carers;
- have a social worker;
- are looked after or previously looked after;
- are in kinship care;
- have experienced trauma or adverse childhood experiences;
- have English as an additional language;
- are asylum seekers or refugees;
- are living in temporary or unstable accommodation;
- are affected by domestic abuse, parental conflict, substance misuse or parental mental ill health;
- have a parent in prison or are otherwise affected by parental offending;
- are at risk of sexual or criminal exploitation;
- are at risk of serious violence or gang involvement;
- are at risk of trafficking or modern slavery;
- are at risk of female genital mutilation, forced marriage or other honour- or faith-based abuse;
- are at risk of radicalisation or extremist exploitation;
- are frequently absent from education or missing from education;
- are privately fostered;
- are lesbian, gay or bisexual, or are perceived by others to be;
- are questioning their gender;
- are experiencing mental-health difficulties;
- are experiencing prejudice, racism or discrimination;
- may be isolated from their peers;

- are international students living with a host family where such an arrangement is made or supported by the College; or
- face several of these circumstances simultaneously.

Staff must avoid assumptions. Behaviour, mood, attendance, attainment, communication or injury must not automatically be attributed to a child's disability, family circumstances, adolescence or any other characteristic without appropriate professional curiosity.

Roles and responsibilities

The Board of Trustees

The Board of Trustees acts on behalf of the proprietor and has overall strategic responsibility for safeguarding.

The Board will ensure that:

- the College has effective arrangements to safeguard and promote children's welfare;
- safeguarding is at the forefront of policy and decision-making;
- this policy is reviewed and approved at least annually;
- safeguarding policies and procedures are clear, accessible and implemented consistently;
- the DSL has appropriate authority, status, time, funding, training, resources and support;
- sufficiently robust DSL cover arrangements are maintained;
- all staff receive appropriate safeguarding training;
- trustees themselves receive appropriate safeguarding and online-safety training;
- recruitment and suitability procedures comply with Part 4 of the Independent School Standards and KCSIE;
- the Single Central Record is maintained accurately;
- appropriate procedures exist for allegations that may meet the harm threshold and for low-level concerns;
- appropriate filtering, monitoring and cyber-security arrangements are in place;
- the effectiveness of filtering and monitoring is reviewed at least annually;
- the College maintains an appropriate Restrictive Interventions Policy;
- online safety forms an integral part of safeguarding;
- safeguarding arrangements properly address students with SEND and other vulnerabilities;
- appropriate procedures exist for child-on-child abuse;
- safeguarding requirements form part of arrangements with organisations using College premises;
- the College obtains appropriate safeguarding assurance concerning alternative provision and external providers;
- safeguarding information is considered alongside attendance and children missing education;
- appropriate risk-management systems support safeguarding; and
- the effectiveness of safeguarding is subject to scrutiny and challenge rather than policy approval alone.

A named trustee will have responsibility for safeguarding oversight but will not replace the collective responsibility of the Board.

The safeguarding trustee will meet the DSL regularly, scrutinise evidence of implementation and report to the Board. Scrutiny may include training records, safeguarding trends, anonymised case sampling, referrals and outcomes, student voice, filtering and monitoring, attendance links, allegations and low-level concerns and safer recruitment assurance.

The Single Central Record will be subject to regular independent scrutiny on behalf of the Board.

Trustees will respect the confidentiality of individual safeguarding cases and will not routinely receive information identifying individual children unless there is a clear safeguarding or governance reason for doing so.

The Head of College

The Head of College is responsible for ensuring that this policy is implemented effectively.

The Head of College will:

- promote an open and vigilant safeguarding culture;
- ensure staff understand and follow College safeguarding arrangements;
- ensure safeguarding forms part of staff induction;
- ensure sufficient DSL and deputy DSL capacity;
- ensure referrals and external-agency advice are acted upon;
- ensure safer recruitment arrangements are followed;
- ensure allegations and low-level concerns are managed appropriately;
- ensure attendance, behaviour, SEND, pastoral and safeguarding systems work together;
- ensure appropriate action is taken following serious safeguarding incidents;
- ensure safeguarding policies remain coherent and consistent; and
- report appropriately to the Board.

The Head of College normally acts as case manager for allegations concerning members of staff.

Where an allegation concerns the Head of College, the Chair of the Board will act as case manager.

The Designated Safeguarding Lead

The DSL is a senior member of the College's leadership team.

The DSL takes lead responsibility for child protection and wider safeguarding, including:

- providing safeguarding advice and support;
- responding to concerns and disclosures;
- deciding upon and making referrals;

- working with children's social care, police, health and other agencies;
- contributing to strategy discussions and multi-agency assessments;
- supporting staff who make referrals directly;
- understanding and responding to child-on-child abuse and harmful sexual behaviour;
- Prevent and Channel referrals;
- online safety;
- understanding the College's filtering and monitoring systems and processes;
- working with technical staff on safeguarding alerts;
- attendance and children missing education where safeguarding concerns exist;
- supporting children with social workers;
- ensuring child protection files are complete and current;
- ensuring safeguarding records are secure;
- transferring child protection files when students move;
- receiving safeguarding information when students join the College;
- ensuring staff know how to report concerns;
- ensuring appropriate support is in place for children affected by abuse;
- understanding local thresholds, Family Help arrangements and referral pathways;
- ensuring safeguarding considerations inform alternative provision and external placements;
- liaising with the LADO where appropriate;
- making or supporting referrals to the DBS and other bodies where required;
- maintaining appropriate safeguarding training and awareness; and
- reporting safeguarding themes, risks and assurance information to the Head of College and Board.

The DSL will maintain a strong understanding of local and national safeguarding developments.

DSL availability and cover

During term time, the DSL or an appropriately trained deputy will be available during College hours for staff to discuss safeguarding concerns.

The College will maintain effective cover during:

- DSL absence;
- educational visits;
- off-site activities;
- examination periods;
- before- and after-school provision; and
- other College-organised activities involving children.

Deputy DSLs are trained to the same standard as the DSL and may undertake delegated safeguarding functions.

Ultimate lead responsibility remains with the DSL.

The absence of the DSL or a deputy must never delay safeguarding action. Where necessary, any member of staff may contact children's social care or the police directly.

All staff

Safeguarding is everyone's responsibility.

All staff will:

- read and understand Part One of *Keeping Children Safe in Education 2026* in full;
- review Part One at least annually;
- read and understand this policy;
- read the Staff Code of Conduct;
- know the identity of the DSL and deputy DSLs;
- understand the College's reporting systems;
- undertake required safeguarding training;
- understand online safety and their responsibilities for filtering and monitoring;
- understand the College's response to unauthorised absence and children missing education;
- be familiar with early help and Family Help arrangements;
- recognise indicators of abuse, neglect and exploitation;
- maintain professional curiosity;
- report concerns without avoidable delay;
- listen appropriately when a child makes a disclosure;
- make accurate, contemporaneous records;
- maintain appropriate confidentiality;
- share safeguarding information where necessary;
- never assume somebody else will report a concern;
- challenge inappropriate sexualised, racist, discriminatory, misogynistic, misandrist or abusive behaviour;
- understand that mental-health concerns can become safeguarding concerns;
- be alert to online influences and emerging harms;
- understand that different safeguarding harms may overlap; and
- act in a child-centred way.

Staff working directly with children will also be familiar with the specific safeguarding issues set out in Annex A of KCSIE 2026. The College may require Annex A to be read by all staff.

Staff must not conduct their own safeguarding investigation unless specifically asked to undertake a defined action by the DSL or another authorised safeguarding professional.

Staff must never promise a child complete confidentiality.

Students

Students will be taught, in age-appropriate ways:

- how to recognise unsafe or abusive behaviour;
- that abuse is never their fault or something they are expected to tolerate;
- the importance of consent and respectful relationships;
- how to behave responsibly online;
- how to identify grooming, manipulation and coercion;
- where to seek support;
- how to report concerns for themselves or others; and
- that concerns will be taken seriously.

Students may speak to any member of staff about a safeguarding concern.

They may also approach their tutor, class teacher, Head of Year, pastoral leader, Head of Prep, Head of Sixth Form, DSL or deputy DSL.

Reporting arrangements will be explained through induction, tutorials, assemblies, curriculum teaching and pastoral provision.

No child is required to use a particular form of words or a formal reporting process before the College will act.

Parents

The College seeks a close and trusting safeguarding partnership with parents.

Parents are encouraged to:

- share relevant welfare and safeguarding information;
- keep emergency contact details current;
- inform the College of significant changes affecting their child;
- work constructively with College safeguarding and pastoral arrangements;
- reinforce safe online behaviour;
- support attendance and punctuality;
- report concerns promptly; and
- understand that the College may sometimes need to share information or make a referral without parental agreement in order to protect a child.

Preventative safeguarding education

The College plays an important role in preventing harm.

Preventative education forms part of a whole-College culture characterised by high expectations, respectful relationships and zero tolerance of abuse.

This is underpinned by the College's:

- Curriculum Policy;
- Relationships and Sex Education Policy;
- Behaviour Policy;
- Anti-Bullying Policy;

- Online Safety Policy;
- Acceptable Use of Technology, Internet and Artificial Intelligence Policy;
- tutorial and pastoral programmes;
- Character Development Programme; and
- wider Catholic formation.

Students will receive age-appropriate education concerning:

- healthy and respectful relationships;
- friendship and boundaries;
- consent;
- stereotypes and prejudice;
- racism and discrimination;
- equality and dignity;
- body confidence and self-esteem;
- coercion and controlling behaviour;
- grooming;
- sexual exploitation and abuse;
- sexual harassment and sexual violence;
- domestic abuse;
- female genital mutilation;
- forced marriage and honour-based abuse;
- online relationships;
- harmful online material;
- misogyny and misandry;
- radicalisation and extremism;
- exploitation;
- safe use of technology;
- nudes and semi-nudes;
- AI-generated harmful or intimate images; and
- how to obtain help.

Sexism, racism, misogyny, misandry, homophobia, biphobia, sexual harassment, sexual violence, derogatory behaviour and other forms of abuse or violence will be challenged.

The College will not dismiss harmful behaviour as banter, just having a laugh, part of growing up or boys being boys.

Recognising concerns, abuse and exploitation

All staff must be alert to possible abuse, neglect, exploitation and other harm.

A child may need help or protection where, for example, they:

- have unexplained injuries;
- show significant changes in behaviour, mood or presentation;
- become unusually withdrawn, fearful or aggressive;
- display sexualised behaviour inappropriate to their age or development;
- disclose abuse directly or indirectly;
- are repeatedly or unexpectedly absent from education;

- go missing from home or care;
- experience a sudden decline in attendance or attainment;
- appear frightened of a person or place;
- have unexplained money, possessions or gifts;
- are involved with older individuals or concerning peer groups;
- show signs of grooming, exploitation or coercion;
- are affected by gangs, county lines, serious violence or weapons;
- misuse substances;
- display signs of radicalisation;
- are exposed to harmful or extreme online material;
- are involved in sending or receiving sexual imagery;
- are being controlled or exploited online;
- experience domestic abuse;
- have caring responsibilities;
- are experiencing significant mental-health difficulty;
- may be at risk of FGM or forced marriage; or
- appear to be experiencing several overlapping harms.

These indicators are not exhaustive.

Children may not:

- recognise that their experience is abusive;
- know how to explain what has happened;
- feel ready to disclose;
- know whom to trust;
- use the language adults expect;
- disclose in one conversation;
- understand that an online relationship is exploitative; or
- be able to communicate easily because of disability, communication need, language or fear.

A lack of direct disclosure must never prevent staff from exercising professional curiosity.

Responding to a safeguarding concern

Immediate danger or likely significant harm

If a member of staff believes that a child is in immediate danger or is suffering or likely to suffer significant harm, they must act immediately.

The member of staff should:

- contact the DSL without delay where this can be done safely;
- make an immediate referral to Croydon Children's Social Care and/or the police where necessary; and
- inform the DSL as soon as possible if they have made a referral themselves.

Anyone can make a safeguarding referral.

Seeking the DSL's agreement is not a prerequisite where doing so would cause delay.

If a child is in immediate danger, call 999.

If a child makes a disclosure

The member of staff should:

- listen carefully;
- take the child seriously;
- remain calm;
- give the child time to speak;
- use open and non-leading questions only where clarification is genuinely necessary;
- avoid pressing for detail;
- reassure the child that they have done the right thing by speaking;
- explain that the information must be shared with people who can help;
- never promise secrecy;
- avoid expressing disbelief, shock or blame;
- avoid confronting the person alleged to have caused harm;
- record the child's words as accurately as possible;
- distinguish clearly between fact, observation and professional opinion;
- record the date, time and circumstances;
- report immediately to the DSL; and
- follow any instructions needed to secure the child's immediate safety.

Staff must not ask the child to repeat their account to several adults unnecessarily.

Recording concerns

Concerns about students are recorded through the College's StudentSafe safeguarding system within CPOMS, in accordance with College procedures. Concerns by visitors can be logged on Welfare Concern Form at the College reception and handed to the DSL or a dDSL.

Where immediate action is required, staff must speak directly to the DSL or deputy as well as completing the electronic record. An electronic entry must never be treated as sufficient where a child may be at immediate risk.

Concerns about the conduct of adults are reported using the arrangements set out in section 23 and, where applicable, through StaffSafe.

Early help, Family Help and multi-agency working

Safeguarding includes providing help when problems first emerge.

Staff should be alert to children and families who would benefit from support before a situation reaches the threshold for statutory child-protection intervention.

The DSL will consider:

- support available within the College;
- universal community services;
- targeted early help;
- Family Help;
- health support;
- SEND services;
- attendance support;
- mental-health services;
- local authority services; and
- voluntary-sector provision.

Under *Working Together to Safeguard Children 2026*, Family Help is intended to provide a more integrated approach to targeted early help and support for children in need.

The DSL will follow Croydon's current thresholds, assessment protocols and published multi-agency arrangements.

Where an inter-agency assessment is appropriate, the College will contribute fully and may provide or support the lead practitioner where appropriate.

Early help must not be allowed to become a reason for delaying a statutory safeguarding referral.

If circumstances deteriorate, risks increase or support is not improving the child's situation, the DSL will reconsider the level of intervention and refer to children's social care where appropriate.

Referrals and escalation

Where referral is appropriate, the DSL will normally make it or support the member of staff making it.

If a member of staff makes a referral directly, they must inform the DSL as soon as possible.

The College expects to receive information from children's social care about the outcome or next steps following a referral.

Where expected feedback is not received, the DSL or referrer will follow up.

Where the College believes that its safeguarding concerns have not been adequately addressed, it will use Croydon's published professional escalation procedures.

Professional disagreement must never result in inaction where a child may remain at risk.

Female genital mutilation

Female genital mutilation is illegal and is a form of child abuse.

A teacher has a specific statutory duty where, in the course of their professional work, they:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that FGM has been carried out on a girl under 18 and there is no reason to believe the act was medically necessary.

The teacher must report the matter personally to the police.

The teacher should also inform the DSL unless specifically advised not to do so.

Where FGM is suspected or a child appears to be at risk, but it is not known to have occurred, staff must report the concern immediately to the DSL and normal safeguarding referral procedures will apply.

Staff must never examine a child to determine whether FGM has occurred.

Prevent, radicalisation and extremism

Radicalisation is a safeguarding matter.

Staff will be alert to changes in behaviour, relationships, language, online activity or interests which may indicate that a child is vulnerable to extremist exploitation or terrorism.

Staff should report concerns immediately to the DSL.

The DSL will assess the concern and may:

- seek advice from the Croydon Prevent Team;
- make a Channel referral;
- contact children's social care; or
- contact the police.

Where a child may be in immediate danger or a terrorism-related offence may be imminent, the police will be contacted without delay.

Prevent concerns will be treated proportionately and without stereotyping or discrimination.

Mental health and safeguarding

Mental-health difficulties may sometimes:

- indicate that a child has experienced abuse, neglect or exploitation;
- increase vulnerability to harm; or
- develop into a safeguarding concern, including where there is self-harm or risk of suicide.

Only appropriately qualified professionals should diagnose a mental-health condition.

Staff should nevertheless remain alert to signs including:

- significant changes in behaviour;
- persistent withdrawal;
- marked changes in eating or sleeping;
- unexplained deterioration in attendance;
- self-neglect;
- evidence of self-harm;
- persistent expressions of hopelessness;
- suicidal thoughts or plans; and
- sudden significant changes in social relationships or functioning.

Where a mental-health concern is also a safeguarding concern, this policy must be followed immediately.

Where there is an immediate threat to life or serious injury, emergency medical assistance or the police will be contacted.

Mental-health support does not replace child-protection action where abuse, neglect or exploitation may be involved.

The College's Student Mental Health and Wellbeing Policy provides further arrangements.

Child-on-child abuse

Children can abuse other children.

Child-on-child abuse may occur:

- inside or outside the College;
- online;
- within intimate relationships;
- between two children or within a group; and
- between children of different or the same ages.

The absence of reported incidents does not mean that abuse is not occurring.

The College operates a zero-tolerance approach to child-on-child abuse.

For some, but not all, forms of child-on-child abuse, girls are more likely to be victims and boys more likely to be perpetrators. The College will remain alert to these patterns while recognising that any child may experience or perpetrate abuse.

Child-on-child abuse may include:

- bullying, including cyberbullying and prejudice-based bullying;
- abuse within intimate personal relationships;
- physical abuse;
- hitting, kicking, shaking, biting or otherwise causing physical harm;

- violence involving weapons;
- sexual violence;
- sexual harassment;
- harmful sexual behaviour;
- sexualised comments or jokes;
- misogynistic or misandrist harassment;
- unwanted sexual touching;
- making or sharing nudes or semi-nudes, including AI-generated imagery;
- forcing another child to engage in sexual activity;
- coercion;
- upskirting;
- initiation or hazing-type violence and rituals; and
- other behaviour which causes or risks physical, sexual or emotional harm.

Preventing child-on-child abuse

The College will:

- establish high expectations for behaviour;
- challenge discriminatory, sexualised and derogatory language;
- teach consent and respectful relationships;
- respond to lower-level harmful behaviour before it escalates;
- address harmful online influences;
- recognise the relationship between misogyny, misandry and harmful sexual behaviour;
- promote reporting systems;
- analyse patterns, locations and groups associated with incidents;
- consider whether incidents reveal environmental or cultural concerns;
- respond appropriately to behaviour on transport, online or outside College where it affects students' welfare; and
- ensure staff understand that a child causing harm may themselves have safeguarding needs.

Responding to an allegation against another student

Staff must:

- take the report seriously;
- ensure immediate safety;
- record the allegation;
- report it to the DSL immediately;
- avoid investigating the allegation themselves;
- preserve evidence appropriately; and
- avoid requiring the children involved to meet, mediate or reconcile.

The DSL will:

- assess immediate risk;
- consider referral to children's social care;
- consider police referral;
- establish separate support arrangements for the child reported to have been harmed;

- consider safeguarding and support needs of the child alleged to have caused harm;
- consider the needs of witnesses and other affected students;
- implement a written risk assessment where appropriate;
- consider lessons, shared spaces, arrival and departure arrangements and College transport;
- consider sibling or intra-familial risks;
- work with parents and external agencies;
- review the effectiveness of safeguarding arrangements; and
- ensure decisions and reasons are recorded.

Support and disciplinary action are not mutually exclusive. A child alleged to have caused harm may require safeguarding support while also being subject to the Behaviour Policy.

Sexual violence, sexual harassment and harmful sexual behaviour

Sexual violence and sexual harassment between children are never acceptable.

The College recognises that harmful sexual behaviour exists on a continuum and that early intervention can prevent escalation.

Reports will be handled in a child-centred way.

Staff will:

- take reports seriously;
- avoid victim blaming;
- reassure the child that they are not responsible for the abuse;
- avoid creating unnecessary barriers to reporting;
- consider online as well as face-to-face behaviour;
- be aware of the role of misogynistic and misandrist attitudes;
- consider the possibility of wider peer-group or cultural issues; and
- report concerns immediately.

The DSL will consider each report individually, taking account of:

- the wishes of the child who has reported harm;
- the nature of the alleged behaviour;
- ages and developmental stages;
- any power imbalance;
- repetition or patterns;
- disability or SEND;
- coercion;
- the existence of images or recordings;
- wider peer-group dynamics;
- risks of retaliation or bullying;
- online dissemination;
- criminal offences; and
- advice from social care or police.

Where a report of rape, assault by penetration or sexual assault is made, referral to the police will be the normal starting point. Where the alleged child who caused harm is below the age of criminal responsibility, this does not remove the need to consider police involvement.

Safeguarding arrangements will not be delayed simply because a police investigation is ongoing.

The College may take behaviour or disciplinary action while external investigations continue where this can be done without prejudicing those investigations.

Making and sharing nudes and semi-nudes, including AI-generated images

All incidents involving the making or sharing of nudes or semi-nudes by children require a safeguarding response.

This includes:

- consensual sharing;
- non-consensual sharing;
- altered images;
- deepfakes;
- face-swaps;
- AI-generated intimate images; and
- images purporting to depict a real person.

A member of staff who becomes aware of such an incident must report it immediately to the DSL.

Staff must not:

- deliberately view the imagery;
- copy it;
- print it;
- forward it;
- save it;
- ask a student to send it to them;
- ask a student to download it;
- ask children to investigate who created or distributed it;
- ask a child to delete it before the DSL has considered preservation of evidence; or
- blame or shame a child.

If imagery has been viewed accidentally, the member of staff must report this to the DSL.

The DSL will carry out an initial safeguarding review and consider:

- immediate risk;
- coercion, grooming or blackmail;
- the ages and developmental needs of the children;
- whether an adult is involved;

- whether a child lacks capacity to understand or consent;
- the nature of the imagery;
- whether it depicts violence or unusual sexual acts;
- whether a child under 13 is depicted in sexual activity;
- whether imagery has been widely distributed;
- self-harm or suicide risk;
- police involvement;
- children's social care involvement;
- involvement of parents; and
- removal or reporting of material from online platforms.

The College will follow current UK Council for Internet Safety and statutory guidance.

All decisions and actions will be recorded.

Online safety, artificial intelligence, filtering and monitoring

Online safety is an integral part of safeguarding.

The College considers online risk through four broad areas:

Content – what students see, hear or experience, including pornography, racism, misogyny, self-harm content, extreme violence, radicalisation, misinformation and harmful AI-generated material.

Contact – interaction with others, including grooming, exploitation, coercion, harmful peer pressure, adults posing as children and simulated relationships through generative AI.

Conduct – behaviour which causes or increases risk, including cyberbullying, harassment, intimate imagery, deepfakes, impersonation and attempts to bypass security.

Commerce – financial and commercial risks including scams, gambling, phishing, identity theft and financial exploitation.

The College maintains appropriate filtering and monitoring on College networks and managed devices.

The DSL has safeguarding oversight of filtering and monitoring and works with the designated senior leadership and technical leads.

The member of SLT responsible for filtering and monitoring, supported by the DSL and technical staff, will review its effectiveness at least once each academic year.

The Board will receive assurance concerning this review.

Filtering and monitoring do not replace:

- staff supervision;
- curriculum education;

- pastoral care;
- behaviour expectations;
- student reporting; or
- parental partnership.

Failures, gaps or attempts to circumvent filtering must be reported.

The College's requirements concerning filtering and monitoring extend appropriately to generative artificial intelligence.

New AI products used by the College will be considered for:

- safeguarding risk;
- privacy;
- age appropriateness;
- harmful content;
- data processing;
- human oversight; and
- filtering and monitoring implications.

The detailed arrangements are set out in the Online Safety Policy and Acceptable Use of Technology, Internet and Artificial Intelligence Policy.

Mobile phones, cameras and personal technology

The College is mobile-phone-free by default during the school day.

Students will not have access to personal mobile phones during the College day except where an exception has been expressly approved in accordance with College policy, for example where there is an identified medical, SEND or other legitimate need.

Detailed age-specific arrangements are set out in the Online Safety Policy and related College procedures.

Staff must comply with the Staff Code of Conduct concerning personal devices.

Staff must never:

- photograph or record students using a personal device;
- use personal messaging or social-media accounts to communicate professionally with students; or
- use personal devices in a way which compromises safeguarding or professional boundaries.

Additional EYFS requirements are set out in section 27.

Attendance, children absent from education and children missing education

Attendance is a safeguarding matter.

Patterns of absence may indicate:

- abuse or neglect;
- exploitation;
- county lines activity;
- trafficking;
- domestic abuse;
- mental-health difficulty;
- bullying;
- unmet SEND;
- young caring responsibilities;
- radicalisation;
- family stress; or
- other welfare concerns.

The College will follow its Attendance Policy and Children Missing Education and Children Absent from Education Policy.

Where a student is expected but absent without satisfactory explanation, the College will follow first-day absence procedures promptly.

Safeguarding action will be determined by risk rather than a numerical attendance threshold.

Where a student's whereabouts are unknown, contact cannot be established or information gives rise to immediate welfare concern, staff will notify the DSL and take safeguarding action without waiting for persistent-absence thresholds to be reached.

The DSL works closely with the Senior Attendance Champion.

Information about students with social workers or known safeguarding vulnerabilities will inform the urgency of the College's response.

Repeated unexplained absence from lessons while a student is believed to be on site will also be treated as a safeguarding concern.

Students who may face additional safeguarding barriers

Students with SEND or disabilities

Students with SEND, disabilities and some health conditions may face additional safeguarding risks online and offline.

Barriers may include:

- signs of abuse being incorrectly attributed to SEND or a medical condition;
- communication difficulties;
- difficulty recognising abusive behaviour;

- dependence on adults for care;
- intimate-care needs;
- social isolation;
- increased risk of bullying;
- greater exposure to peer pressure;
- difficulty distinguishing fact from fiction online;
- difficulty understanding the consequences of online actions; and
- abuse having a disproportionate effect without obvious external signs.

Staff must not assume that behaviour, mood or injury is explained by a student's SEND without further consideration.

Where a student needs communication support to make a disclosure, the DSL and SENCO will ensure appropriate arrangements are made.

The DSL and SENCO will work closely together where safeguarding concerns involve a student with SEND.

Additional pastoral support will be provided where appropriate.

Students with medical conditions

An incident involving management of a student's medical condition, including an allergy, does not automatically constitute a safeguarding referral.

A safeguarding response will nevertheless be required where the circumstances suggest that the child may be at increased risk of neglect, abuse or exploitation because of their medical condition.

Examples may include:

- essential medication being repeatedly withheld;
- important medical information deliberately not being shared;
- persistent failure to follow necessary treatment in circumstances causing risk; or
- deliberate exploitation of the child's dependency.

Young carers

The College recognises that caring responsibilities can affect:

- attendance;
- attainment;
- behaviour;
- emotional wellbeing;
- social relationships; and
- a child's ability to participate fully in College life.

Staff will seek to identify young carers early and provide or arrange appropriate support.

Students with a social worker

Where a student has a social worker, the DSL will ensure that this information informs safeguarding and educational decision-making.

The College will work constructively with the social worker and will consider the possible impact of trauma and adversity upon:

- attendance;
- behaviour;
- learning;
- mental health; and
- vulnerability to further harm.

Unexplained or concerning absence will be shared promptly with the social worker where appropriate.

Looked-after and previously looked-after students

The College will ensure that relevant staff have sufficient information concerning:

- the student's care status;
- care arrangements;
- contact arrangements;
- the social worker; and
- relevant Virtual School Head.

The College will maintain an appropriately trained teacher to lead on promoting the educational achievement of looked-after and previously looked-after students.

That teacher will work closely with the DSL.

Lesbian, gay and bisexual students

Being lesbian, gay or bisexual is not itself a safeguarding risk.

However, students who are, or are perceived by others to be, lesbian, gay or bisexual may be vulnerable to discriminatory bullying, harassment or abuse.

The College will:

- challenge such behaviour;
- provide safe opportunities to seek support;
- respond to safeguarding concerns; and
- apply the Behaviour and Anti-Bullying Policies consistently.

Students questioning their gender

The College recognises that children questioning their gender may experience complex social, emotional, family or mental-health circumstances and may also be vulnerable to bullying.

The DSL will have appropriate oversight where safeguarding or requests for significant support arise.

The College will take a careful, child-centred approach and will:

- seek to understand the individual child's circumstances;
- maintain professional curiosity;
- avoid assumptions based upon stereotypes;
- challenge bullying or harassment;
- consider the child's welfare and best interests;
- consider the welfare and rights of other children;
- engage parents as a matter of priority where a child requests support or changes in how the College treats them;
- only withhold information from parents where there is a specific reason to believe that parental involvement would place the child at greater risk;
- comply with the Equality Act 2010 and Human Rights Act 1998; and
- keep appropriate records of decisions.

The College will not initiate social transition.

Where a child or parent asks the College to make changes associated with social transition, the College will consider the request carefully and parents will ordinarily be involved before changes are made.

Individual members of staff must not independently introduce such changes outside an agreed College decision.

Single-sex facilities

Students will use toilets, changing rooms and showers designated for their biological sex.

The College will make reasonable arrangements for privacy and individual needs where appropriate, including suitable alternative facilities where available.

Single-sex sport

Where sport is lawfully organised by sex for reasons of fairness or safety, participation will be determined in accordance with biological sex and the applicable legal framework.

Any safeguarding concern arising in connection with gender questioning will be considered independently of wider questions concerning social transition.

Domestic abuse and Operation Encompass

Children can experience domestic abuse directly or indirectly.

A child who sees, hears or experiences the effects of domestic abuse is recognised as a victim in their own right.

Domestic abuse may involve:

- physical abuse;
- sexual abuse;
- emotional or psychological abuse;
- coercive and controlling behaviour;
- financial or economic abuse; and
- technology-facilitated abuse.

The College participates in statutory Operation Encompass arrangements and will respond appropriately to information supplied by the police concerning domestic abuse incidents affecting a student.

Information will be handled sensitively and shared only with those who need it to safeguard and support the child.

Parents, confidentiality and information sharing

Informing parents

The DSL will normally discuss safeguarding concerns with the child's parent where this is safe and appropriate.

Other staff should not contact a parent about a safeguarding disclosure without consulting the DSL.

The College may make a referral or share information without parental consent where:

- a child may be at risk of harm;
- seeking consent would cause harmful delay;
- seeking consent would place the child or another person at greater risk;
- doing so would prejudice an investigation; or
- another lawful basis permits or requires sharing.

Where child-on-child abuse is reported, the College will normally communicate with the parents of the children involved, while protecting confidential information about other children.

Confidentiality

Safeguarding information is confidential but is not secret.

Staff must never promise a child that information will not be shared.

Information will normally be shared on a need-to-know basis.

The child's wishes and feelings will be considered, but a request not to share information cannot prevent the College from acting where safeguarding requires it.

Lawful information sharing

The Data Protection Act 2018 and UK GDPR do not prevent information being shared for the purpose of protecting children.

Fears about data protection must never be allowed to stand in the way of necessary safeguarding action.

Where special-category personal data is involved, safeguarding may provide a lawful condition for processing.

The College will apply principles of:

- necessity;
- proportionality;
- relevance;
- accuracy;
- security; and
- appropriate record-keeping.

Where staff are uncertain about information sharing, they should consult the DSL or Data Protection Lead. Uncertainty must not be allowed to cause unsafe delay.

Concerns and allegations about adults

The College maintains a separate Managing Allegations Against Staff and Low-Level Concerns Policy, which should be read alongside this policy and the Staff Code of Conduct.

Concerns which may meet the harm threshold

The harm threshold may be met where a person working with children 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 which indicates that they may pose a risk of harm; or
- behaved, or may have behaved, in a way which indicates that they may not be suitable to work with children.

The final category includes relevant behaviour outside the College.

Any such concern about a member of staff, supply teacher, trainee teacher, volunteer, contractor or other adult working for the College must be reported as soon as possible to the Head of College.

A concern about the Head of College must be reported directly to the Chair of the Board of Trustees.

Where there is a genuine conflict of interest in using the normal reporting route, the concern may be raised directly with the LADO.

Staff must not investigate allegations about colleagues themselves.

The College will consult the LADO as required.

Low-level concerns

A low-level concern is any concern, however small, that an adult working in or on behalf of the College may have acted in a way which:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work; and
- does not meet the harm threshold.

The term low-level does not mean insignificant.

Staff must report low-level concerns promptly to the Head of College in accordance with the separate policy. Staff can log a concern via StaffSafe on CPOMS.

Staff are encouraged to self-refer where:

- a situation could be misinterpreted;
- a professional boundary may inadvertently have been crossed; or
- they recognise that their conduct fell below expected standards.

Low-level concerns will be recorded, reviewed and considered for patterns.

Organisations using College premises

Where an allegation concerns an adult or organisation using College premises to provide activities for children, the College will follow safeguarding procedures and involve the LADO as it would for another safeguarding allegation.

Safeguarding requirements form a condition of use of College premises.

Whistleblowing and professional challenge

Staff must be able to raise concerns about:

- poor safeguarding practice;
- unsafe systems;
- failures to act;
- inappropriate conduct;
- concealment of concerns; or
- attempts to prevent legitimate safeguarding reporting.

Staff should follow the College's Whistleblowing Policy.

Nothing in College procedures prevents a member of staff from raising a safeguarding concern with an appropriate external body where internal reporting is inappropriate or has failed to address the risk.

Staff must not suffer retaliation for raising a genuine concern in good faith.

Safer recruitment and suitability

The College's detailed arrangements are contained in the Recruitment and Safer Recruitment Policy.

Safeguarding is embedded throughout recruitment.

The College will:

- deter unsuitable applicants;
- scrutinise application histories;
- undertake appropriate online searches of shortlisted applicants;
- obtain and scrutinise references;
- explore gaps and inconsistencies;
- assess candidates' suitability to work with children;
- undertake identity, DBS, barred-list, prohibition, section 128, right-to-work and overseas checks where applicable;
- meet childcare disqualification requirements where relevant;
- maintain an accurate Single Central Record;
- ensure no barred person undertakes regulated activity;
- undertake checks on volunteers in accordance with current requirements;
- complete appropriate checks for contractors, supply staff and trainee teachers;
- keep recruitment records appropriately; and
- make statutory referrals to the Disclosure and Barring Service and Teaching Regulation Agency where required.

At least one member of an interview panel will normally have completed appropriate safer-recruitment training.

No safeguarding concern identified during recruitment may simply be ignored because a candidate is otherwise considered suitable.

Restrictive interventions, reasonable force and searching

The College maintains a separate Restrictive Interventions Policy.

Any restrictive intervention must be:

- lawful;
- reasonable;
- proportionate;
- necessary in the circumstances; and
- never used as punishment.

Where a restrictive intervention raises a safeguarding concern, the DSL will be informed.

The College will consider:

- the child's age and development;
- SEND or disability;
- medical needs;
- trauma history;
- the circumstances leading to the intervention;
- the risk presented;
- whether reasonable adjustments were required; and
- whether any pattern requires further action.

Searching and confiscation will be undertaken in accordance with applicable law, DfE guidance, the Behaviour Policy and safeguarding procedures.

A search must never be used as a substitute for a safeguarding assessment.

Early Years Foundation Stage

This policy applies fully to Reception and must be read alongside the College's EYFS Policy.

The College will ensure that EYFS safeguarding and welfare requirements are met, including those relating to:

- staff suitability;
- safeguarding training;
- childcare disqualification;
- staff supervision;
- appropriate ratios and supervision;
- key persons;
- missing children;
- collection arrangements;
- medicines;

- intimate care;
- first aid;
- allegations against adults;
- use of mobile phones and cameras; and
- appropriate notification to external bodies where required by the EYFS statutory framework or the College's regulatory arrangements.

Staff working within the EYFS must have sufficient understanding and use of English to safeguard children effectively, including being able to:

- keep required records;
- communicate with agencies;
- summon emergency assistance; and
- understand safety instructions.

Personal devices and cameras in EYFS

Personal mobile phones and cameras must not be used to photograph or record children.

Only College-authorised equipment and systems may be used.

Personal devices will be stored or used in accordance with the EYFS Policy and Staff Code of Conduct so that their use does not compromise safeguarding.

Visitors, volunteers, contractors, external providers and alternative provision

The College will maintain safeguarding arrangements for visitors and other adults entering the site.

These will include:

- identity and purpose checks;
- appropriate supervision;
- safeguarding information;
- DBS or other checks where required;
- visitor identification;
- restrictions on unsupervised access; and
- appropriate action where behaviour raises concern.

Where another organisation provides activities or services on College premises, the College will seek assurance that appropriate safeguarding arrangements exist.

Where the College commissions alternative provision, it retains responsibility for the safeguarding and welfare of the student and will obtain appropriate assurance concerning:

- registration status where applicable;
- safeguarding arrangements;
- staff suitability;

- attendance;
- curriculum and supervision;
- premises;
- risk management; and
- communication of concerns.

The College will respond promptly to unexplained absence from alternative provision.

Where the College arranges or facilitates host-family accommodation, appropriate safeguarding checks and procedures will be followed, including any private-fostering obligations that arise.

Safeguarding records

All safeguarding concerns, discussions, decisions and reasons must be recorded.

Records should contain:

- a clear and comprehensive summary of the concern;
- relevant factual information;
- the child's own words where appropriate;
- action taken;
- referrals made;
- advice received;
- decisions reached and the rationale;
- follow-up;
- review; and
- the outcome where known.

Records must distinguish fact from opinion.

Safeguarding records relating to children are maintained securely through the College's safeguarding recording arrangements and separately from the ordinary educational record.

Access is restricted to those who need the information for safeguarding or another legitimate purpose.

The DSL will ensure that records are:

- accurate;
- up to date;
- secure;
- appropriately organised; and
- capable of showing the chronology of concerns and action.

Transfer of child protection files

When a child leaves the College, the DSL will ensure that the child protection file is transferred securely and separately from the main student file.

This will occur as soon as possible and normally:

- within five days of an in-year transfer; or
- within the first five days of the start of a new term.

The College will obtain confirmation of receipt. It will be transferred via CPOMS or a secure email, such as, Egress.

Where safeguarding concerns are significant or complex, the DSL will consider speaking to the receiving DSL before the child transfers so that appropriate arrangements can be made in advance.

The information transferred will be sufficient to enable the receiving setting to understand current safeguarding risk, context, action and support.

When Fidelis College receives a child protection file, the DSL will review it promptly and seek clarification from the previous setting where necessary.

Training and induction

All staff

All staff will receive safeguarding and child-protection training at induction.

Training will cover:

- College reporting arrangements;
- the DSL and deputy DSLs;
- this policy;
- Staff Code of Conduct;
- allegations and low-level concerns;
- whistleblowing;
- child-on-child abuse;
- online safety;
- filtering and monitoring;
- attendance and missing education;
- Prevent;
- information sharing;
- SEND vulnerabilities; and
- relevant emerging safeguarding risks.

All staff will read Part One of KCSIE 2026 in full and confirm that they have done so.

Safeguarding training will be updated regularly.

All staff will receive safeguarding and child-protection updates at least annually and more frequently where required.

Updates may arise through:

- formal training;
- briefings;
- staff meetings;
- written updates;
- case learning;
- online-safety updates; or
- changes to procedures.

DSL and deputy DSLs

The DSL and deputies will undertake appropriate DSL-level training at least every two years.

Their knowledge and skills will also be updated at regular intervals and at least annually.

This will include relevant:

- local multi-agency developments;
- online risks;
- filtering and monitoring;
- Prevent;
- harmful sexual behaviour;
- child protection records;
- information sharing;
- exploitation;
- attendance;
- SEND; and
- emerging safeguarding threats.

Trustees

Trustees will receive safeguarding and online-safety training at induction and regular updates thereafter.

Training will enable trustees to provide informed strategic challenge and assurance.

The Chair will have sufficient understanding of the management of allegations to fulfil the case-manager role where required.

Safeguarding supervision and staff support

Safeguarding work can involve difficult and distressing information.

The College will provide appropriate professional support, supervision or debriefing where necessary.

Staff must nevertheless maintain confidentiality and should not discuss cases informally with colleagues who do not need the information.

Where a member of staff is uncertain about a safeguarding decision, they are expected to seek advice rather than remain silent.

Professional challenge is welcomed where it is directed towards securing the best interests of the child.

Complaints

Safeguarding-related complaints will be considered under the College's Complaints Policy except where a different safeguarding procedure must take priority.

A complaint involving:

- possible abuse by an adult;
- an allegation meeting or potentially meeting the harm threshold; or
- a low-level concern

will be dealt with under the Managing Allegations Against Staff and Low-Level Concerns Policy.

A complaint concerning child-on-child abuse will be considered under this policy and the Behaviour Policy as appropriate.

The use of the Complaints Policy must never delay immediate safeguarding action.

Monitoring, assurance and inspection readiness

Safeguarding is subject to continuous quality assurance.

The DSL and Head of College will review implementation through measures which may include:

- safeguarding case audits;
- record quality;
- referral timeliness;
- scrutiny of children awaiting or receiving external support;
- attendance and CME information;
- child-on-child abuse patterns;
- harmful sexual behaviour;
- online-safety incidents;
- filtering and monitoring alerts;
- low-level concerns;
- allegations against adults;
- training completion;
- staff knowledge checks;
- student voice;
- parent feedback;
- SEND safeguarding;

- alternative provision;
- educational visits;
- safer recruitment;
- the Single Central Record; and
- action arising from incidents or near misses.

The safeguarding trustee will provide regular scrutiny and challenge.

The Board will receive regular safeguarding information sufficient to understand:

- current risks;
- significant themes and trends;
- external referrals;
- the effectiveness of safeguarding action;
- training;
- allegations and low-level concerns at an appropriate level of anonymity;
- filtering and monitoring;
- safer recruitment assurance; and
- actions required.

The policy and its implementation will be reviewed at least annually by the DSL, Head of College and Board.

An earlier review will take place where:

- statutory guidance changes;
- legislation changes;
- local safeguarding arrangements change;
- an incident identifies a weakness;
- an inspection or audit identifies a concern;
- a significant new safeguarding risk emerges; or
- College arrangements change materially.

In evaluating safeguarding, the College will consider the current ISI inspection framework and the Independent School Standards, including evidence that safeguarding expectations are understood and consistently implemented in practice.

Publication and accessibility

This policy will be:

- published on the College website;
- available to parents;
- available to students in an appropriate form;
- available to all staff;
- explained during induction;
- readily available to volunteers and relevant contractors; and
- included as a copy or link within recruitment information for prospective staff.

The DSL will take reasonable steps to ensure that new, temporary and part-time staff understand the policy and know how to raise a concern.

Related College policies and procedures

This policy should be read alongside:

- Staff Code of Conduct and Safer Working Practice Policy;
- Managing Allegations Against Staff and Low-Level Concerns Policy;
- Recruitment and Safer Recruitment Policy;
- Whistleblowing Policy;
- Behaviour Policy;
- Anti-Bullying Policy;
- Attendance Policy;
- Children Missing Education and Children Absent from Education Policy;
- Online Safety Policy;
- Acceptable Use of Technology, Internet and Artificial Intelligence Policy;
- Relationships and Sex Education Policy;
- Preventing Radicalisation and Extremism Policy;
- Restrictive Interventions Policy;
- SEND Policy;
- EAL Policy;
- Student Mental Health and Wellbeing Policy;
- Designated Teacher: Looked-After and Previously Looked-After Students;
- EYFS Policy;
- Data Protection Policy and Privacy Notices;
- Equality, Diversity and Inclusion Policy;
- Complaints Policy;
- Health and Safety Policy;
- First Aid Policy;
- Allergy Safety Policy;
- Educational Visits Policy;
- Supervision of Students Policy;
- Home Visits Policy;
- Security Policy;
- CCTV Policy; and
- relevant risk assessments and safeguarding standard operating procedures.

Appendix 1: Principal forms of abuse and safeguarding harm

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm.

It may also occur where a parent or other person fabricates or induces symptoms of illness.

Emotional abuse

Emotional abuse is persistent emotional maltreatment which causes severe and adverse effects upon a child's emotional development.

It may involve:

- making a child feel worthless or unloved;
- inappropriate expectations;
- preventing normal social interaction;
- serious bullying;
- cyberbullying;
- verbal abuse;
- intimidation;
- exploitation;
- coercive control; or
- causing a child frequently to feel frightened or in danger.

Some level of emotional abuse is involved in all types of maltreatment, although it may also occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities whether or not the child understands what is happening.

It may involve physical contact or non-contact activity and may occur online.

Non-contact abuse may include:

- involving children in sexual images;
- encouraging children to behave in sexually inappropriate ways;
- watching sexual activity;
- grooming;
- sexualised communication; or
- creating or distributing intimate imagery.

Sexual abuse may be committed by adults or children.

Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs where this is likely to result in serious impairment of health or development.

It may include failure to:

- provide adequate food, clothing or shelter;
- protect a child from danger;
- provide adequate supervision;

- secure appropriate medical care or treatment; or
- respond appropriately to a child's emotional needs.

Domestic abuse

Domestic abuse may be physical, sexual, emotional, psychological, controlling, coercive or economic.

Children may experience domestic abuse by:

- being directly abused;
- seeing it;
- hearing it;
- living with its consequences; or
- experiencing coercive control within their own intimate relationship.

Child-to-parent or caregiver abuse

Children may use abusive or violent behaviour towards parents or caregivers.

Such behaviour may itself indicate that the child or family requires safeguarding support and should not be viewed solely as misconduct.

Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse involving an exchange or anticipated exchange of something the child wants or needs and/or financial or other advantage to the perpetrator.

It may:

- occur once or repeatedly;
- involve individuals or organised groups;
- be perpetrated by adults or children;
- occur online or offline;
- involve apparent consent; and
- overlap with trafficking or modern slavery.

Child criminal exploitation

Child criminal exploitation occurs where children are manipulated, coerced or deceived into criminal activity.

It may include:

- county lines;
- drug distribution;
- theft;
- carrying weapons;

- financial crime;
- money laundering; or
- other organised criminal activity.

Children may be moved between locations for exploitation, which may also constitute trafficking or modern slavery.

Serious violence

Indicators may include:

- increased absence;
- changes in friendships;
- relationships with older individuals or groups;
- declining performance;
- self-harm;
- unexplained injuries;
- unexplained gifts or money; and
- carrying weapons.

County lines

County lines describes criminal networks using telephone or online contact to facilitate drug dealing, often involving the exploitation of children and vulnerable adults.

Children may be trafficked, threatened, assaulted, indebted or coerced.

Modern slavery and trafficking

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking.

Children may be trafficked for sexual, criminal, labour or other exploitation.

Honour-based abuse

Honour-based abuse may include:

- forced marriage;
- female genital mutilation;
- violence;
- coercive control;
- imprisonment;
- threats; and
- other abuse justified by reference to family or community honour.

The perceived concept of honour can never justify abuse.

Forced marriage

Forcing a person to marry is a criminal offence.

A forced marriage is one in which one or both people do not or cannot consent and pressure or abuse is used.

Staff must refer concerns to the DSL and must not attempt family mediation.

Radicalisation

Radicalisation is the process through which a person comes to support terrorism or extremist ideologies associated with terrorism.

Children may be exploited online or in person.

Cybercrime

Children with particular technological skills may be vulnerable to becoming involved in cyber-dependent crime.

Where appropriate, the College will consider whether a safeguarding or diversionary response is required rather than viewing such activity only through a disciplinary lens.

Appendix 2: Immediate safeguarding response

If a child is in immediate danger:

Call 999 and take reasonable action to secure safety.

If a child may be suffering or likely to suffer significant harm:

Contact the DSL immediately and refer to children's social care and/or police without delay where required.

If a child makes a disclosure:

Listen, reassure, do not lead, do not promise secrecy, record accurately and report immediately.

If you have a concern but there is no immediate danger:

Report it promptly to the DSL through the College's safeguarding system and speak directly to the DSL where the concern is significant.

If the DSL is unavailable:

Contact a deputy DSL. If no designated person is available, speak to another senior leader and/or make a referral directly. Do not delay action.

If the concern is about an adult:

Report it to the Head of College.

If the concern is about the Head of College:
Report it to the Chair of the Board.

If a teacher knows that FGM has been carried out on a girl under 18:
The teacher must make the mandatory report personally to the police and inform the DSL.

Appendix 3: Safeguarding recording expectations

A safeguarding record should answer:

- What happened or caused concern?
- When and where did it occur?
- Who was present?
- What did the child say?
- What did the member of staff observe?
- What action was taken?
- Who was informed?
- What advice was received?
- What decision was made?
- Why was that decision made?
- What follow-up is required?
- What was the outcome?

Records should be made as soon as practicable.

Staff should use the child's exact words where important and should not rewrite an account to make it sound more formal or coherent.

Safeguarding records must never contain casual, pejorative or speculative language.

Appendix 4: Local safeguarding contacts

Fidelis College DSL

Ben Rix

brix@fidelis.org.uk

dsl@fidelis.org.uk

Emergency safeguarding telephone: 07955 888845

Croydon Children's Social Care / MASH

020 8255 2888

Croydon Emergency Duty Team

020 8726 6400

Croydon LADO

LADO@croydon.gov.uk

020 8726 6000

Current named officer and direct details to be verified from Croydon Council's published LADO information.

Croydon Prevent / Channel
channel@croydon.gov.uk

Police emergency
999

Police non-emergency
101

The DSL will verify these details at least annually and whenever notified of a change.