

## **Safeguarding and Child Protection Policy**

(including allegations against staff)

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**Approved by:** Trustees

**Date:** 12.7.2023

**Custodian:** CEO

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This policy applies to all Sussex Learning Trust Academies who will determine local safeguarding arrangements to deliver the intended outcomes.

### **Key contacts**

#### **Warden Park Secondary Academy**

Designated Safeguarding Lead: **Mark Sorrell**

Deputy Designated Safeguarding Leads: Dom Kenrick, Debbie Wheeler, Robbie Atwell,  
Matt Kelly, Harriet Brooker, Michelle Hale

Safeguarding Governor: Tom Hosking

Digital Safety Officer: Dai Thomas

Chair of Governors: contactable via [clerk@sussexlearningtrust.co.uk](mailto:clerk@sussexlearningtrust.co.uk)

#### **Warden Park Primary Academy**

Designated Safeguarding Lead: **Elizabeth Brodie**

Deputy Designated Safeguarding Leads: Gwen Durnford, Angela Baxter,  
Hannah Dodd

Safeguarding Governor: Rachel Jowett

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#### **Northlands Wood Primary Academy**

Designated Safeguarding Lead: **Mark Sears**

Deputy Designated Safeguarding Leads: Paul Johnson and Kath Cheesmur

Safeguarding Governor at Northlands Wood: Megan Downham

Chair of Governors: contactable via [clerk@northlandswood.co.uk](mailto:clerk@northlandswood.co.uk)

**Woodgate Primary Academy**

Designated Safeguarding Lead: **Sarah Neller**

Deputy Designated Safeguarding Leads: Ruth Whaley & Jenny Bird

Safeguarding Governor at Woodgate Primary Academy: Jon Brydon

Chair of Governors: contactable via [mparnell@woodgateprimary.school](mailto:mparnell@woodgateprimary.school)

**Chichester Free School**

Designated Safeguarding Leads: **Lee Hardwick (all-through & strategic), Cathryn Halton (primary) & Alanya Russell (secondary)**

Deputy Designated Safeguarding Leads: Fiona Dabinett, Alison Turnball, Alexa Angell

Safeguarding Governor: Rob Matthews

Chair of Governors: contactable via [papincipal@chichesterfreeschool.org.uk](mailto:papincipal@chichesterfreeschool.org.uk)

West Sussex Integrated Front Door (IFD)

Tel: 01403 229900

(Out of Hours – 0330 222 6664 or 07711 769657)

[WSChildrensServices@westsussex.gov.uk](mailto:WSChildrensServices@westsussex.gov.uk)

Local Authority Designated Officers (LADO):

Miriam Williams and Donna Tomlinson 0330 222 6450 [LADO@westsussex.gov.uk](mailto:LADO@westsussex.gov.uk)

LADO Service Contact Number: (Available through the IFD ) 01403 229900

West Sussex Safeguarding in Education

Tel: 0330 222 7618 [safeguarding.education@westsussex.gov.uk](mailto:safeguarding.education@westsussex.gov.uk)

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### **Introduction and definitions**

Safeguarding children and child protection apply to all children up to the age of 18.

Safeguarding is the action taken to promote the welfare of children and protect them from harm.

Safeguarding means:

- protecting children from abuse and maltreatment
- preventing impairment of children’s mental and physical health or development;
- ensuring children grow up with the provision of safe and effective care
- acting to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering from, or likely to suffer, significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

Where the term ‘child’ is used, please read ‘child/young person’.

**Safeguarding children is everyone’s responsibility.** Everyone who comes into contact with children and families has a role to play.

The purpose of this policy is to inform staff<sup>1</sup>, parents/carers, volunteers, Trustees and Governors about each academy's responsibilities for safeguarding children and to enable everyone to have a clear understanding of how these responsibilities should be carried out.

We recognise that all adults, including temporary staff, volunteers and Governors, have a full and active part to play in protecting children from harm and that the child’s welfare is our paramount concern.

All staff members believe that our academy should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

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<sup>1</sup> Wherever the word “staff” is used, it covers ALL staff on site, including ancillary and supply staff, and volunteers working with children

## The wider context of Safeguarding

**Human Rights Act 1998.** The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,<sup>25</sup> and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at [Human Rights | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com).

## Equality Act 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality 21 Human Rights Act 1998 ([legislation.gov.uk](https://www.legislation.gov.uk)))

According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need,

this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK ([www.gov.uk](http://www.gov.uk)), it may also be useful for colleges. For further information Equality Act guidance | Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com)).

### **Public Sector Equality Duty**

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges.

The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics (see para 87 (KCSIE '23) and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.

The PSED helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures. For further information please see Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com))

## **2 Safeguarding culture in our academies**

### **Child Protection Statement**

Our academies take their responsibilities to safeguard children extremely seriously and each academy will train and empower all staff to recognise and respond effectively to protect a child who may be at risk of significant harm.

### **3 “It could happen here”**

We will ensure all staff members in our academies maintain an attitude of ‘it could happen here’ and feel able to raise concerns either about a child at risk or a member of staff whose behaviour may present a risk to a child.

#### **Each academy will**

- a. have safeguarding at the heart of everything it does;
- b. maximise opportunities to teach our children / young people how to keep safe both in the real and virtual world;

- c. support the child's/young person's development in ways that will foster security, confidence and independence;
- d. provide an environment in which children and young people feel safe, secure, valued, respected, feel confident;
- e. ensure that because of outstanding pastoral systems ALL of our children / young people know a member of staff they can talk to if they are worried about something;
- f. make sure all of our staff, including volunteers know how to contact child protection agencies should they need to. (Knowledge of this policy provides contact procedures);
- g. provide a systematic means of monitoring children/young people that are known or thought to be at risk of harm, and ensure each academy contributes to assessments of need and support packages for those children/young people;
- h. emphasise the need for good levels of communication between all members of staff and between the academy and other agencies;
- i. have and regularly review, a structured procedure within the academy which will be followed by all members of the academy community in cases of suspected abuse;
- j. develop and promote effective working relationships with other agencies, especially the Police and Children's Social Care;
- k. ensure that all adults within our academy who have access to children have been recruited and checked as to their suitability in accordance with Part 3 of [Keeping Children Safe in Education 2023](#);
- l. have in place, other, up to date policies which support safeguarding. (Please see Annex 1 for a list of such policies).

#### **4 Voice of the Child – [Working Together to Safeguard Children 2018](#)**

Our academies recognise the findings in Working Together to Safeguard Children 2018, where children expressed that they wanted an effective safeguarding system to be typified by:

- a. vigilance: to have adults notice when things are troubling them



- b. understanding and action: to understand what is happening; to be heard and understood; and to have that understanding acted upon
- c. stability: to be able to develop an ongoing stable relationship of trust with those helping them
- d. respect: to be treated with the expectation that they are competent rather than not
- e. information and engagement: to be informed about and involved in procedures, decisions, concerns and plans
- f. explanation: to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response
- g. support: to be provided with support in their own right as well as a member of their family
- h. advocacy: to be provided with advocacy to assist them in putting forward their views
- i. protection: to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee

We will use this information to support the training of our staff and review this and other policies as appropriate.

## 5 Statutory framework

Each academy will act in accordance with the following Government legislation and guidance

- a. The Children Act 1989
- b. The Children Act 2004
- c. Education Act 2002
- d. [Keeping Children Safe in Education \(DfE September 2023\)](#)
- e. Sexual Violence and sexual harassment between children in schools and colleges 2021: [here](#)(withdrawn)
- f. Working Together to Safeguard Children 2018: [here](#)
- g. Regulated Activity in relation to children: scope [here](#)
- h. The Education (Child Information) (England) Regulations 2005
- i. [Prevent Duty](#) for England and Wales (2015) under section 26 of the Counter-Terrorism and Security Act 2015
- j. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015)
- k. Dealing with Allegations of Abuse against Teachers and Other Staff (2012)
- l. Children Missing Education [Statutory guidance 2016](#)
- m. Local Safeguarding Children Partnership Interagency and safeguarding procedures [West Sussex Safeguarding Children Partnership](#)

## **6 Confidentiality**

- a) As a general principle, we will ensure all matters relating to child protection are confidential and should only be shared on a 'need-to-know' basis.
- b) The designated safeguarding lead and safeguarding team will disclose any child protection related information about a child to other members of staff on a need to know basis only.
- c) All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- d) All staff must be aware that they cannot promise a child to keep secrets if doing so might compromise the child's safety or wellbeing.
- e) The intention to refer a child to Children's Social Care will be shared with parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, advice should be sought from the IFD .

## **7 Responsibilities**

Each academy will recognise ALL staff have a crucial role to play in supporting children and identifying concerns early and providing help.

### **Each academy will**

- a. establish and maintain an environment where children feel secure, are encouraged to talk and are listened to
- b. be aware of the signs of abuse and maintain an attitude of "it could happen here" with regards to child protection. Children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, but this shouldn't stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL)
- c. ensure that children know that there are adults in the academy whom they can approach if they are worried about any problems
- d. know what to do if a child tells them they are being abused or neglected

- e. know how and where to record their concerns and report these to the Designated Safeguarding Lead as soon as possible
- f. that if a child is in immediate danger, know how to refer the matter to Children's Social Care and/or the police immediately
- g. support pupils in line with their Child Protection Plan and notify the Designated Safeguarding Lead of any child on a Child Protection Plan who has an unexplained absence
- h. actively plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe
- i. be aware of and follow the [Sussex Child Protection & Safeguarding Procedures](#), produced by West Sussex, East Sussex, and Brighton & Hove. This will include the referral process
- j. have read and understand Part 1 of Keeping Children Safe in Education (KCSIE '23) September 2023 and be alert to signs of abuse and know to whom they should report any concerns or suspicions. Staff will sign each year that they have read and understood KCSIE '23.

**Each academy will ensure staff**

- k. participate in safeguarding training as part of their induction
- l. receive safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children
- m. ensure that they know who the Designated and Deputy Safeguarding Leads are and how to contact them
- n. be aware of the early help assessment process and understand their role in it. This includes identifying problems and working effectively with other agencies that provide support to pupils
- o. refer to the headteacher if they have concerns about another member of staff
- p. refer to the chair of governors where the concerns are about the headteacher.

- q. are aware of systems and policies within the academy, such as the Child Protection policy, behaviour policy, staff behaviour policy and staff response to children who are absent from education.

### **Responsibilities of the Governing Body**

The day to day responsibility of safeguarding is delegated by the Trustees to the Local Governing Body (LGB). The LGB takes seriously its responsibility to safeguard and promote the welfare of children in its care and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support children who are, or who may be, suffering harm.

The nominated Governor for Child Protection at Warden Park Secondary Academy is:

Name: **Tom Hosking**

The nominated Governor for Child Protection at Warden Park Primary Academy is:

Name: **Rachel Jowett**

The nominated Governor for Child Protection at Northlands Wood Primary Academy is:

Name: **Megan Downham**

The nominated Governor for Child Protection at Woodgate Primary Academy is:

Name: **Martin Parnell**

The nominated Governor for Child Protection at Chichester Free School is:

Name: **Rob Matthews**

The responsibilities placed on governing bodies include:

1. making sure that the safeguarding policies & procedures in the school are effective and comply with the law at all times. This should include a Child Protection Policy (contained in this policy, reviewed at least annually and available online); and a Staff Code of Conduct which should, amongst other things, include acceptable use of technologies staff/pupil relationships and communications including the use of social media
2. putting in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions
3. appointing a designated safeguarding lead who is a senior member of staff from the leadership team, who has responsibility for safeguarding and child protection. This should be explicit in the role-holders job description in line with Annex B of Keeping Children Safe in Education 2023.

4. through regular review and audit, ensure that any safeguarding deficiencies or weaknesses within the school are remedied without delay.<sup>2</sup>
5. ensuring that child protection records are kept securely and separately from other records and are only accessed by staff who need to.
6. ensuring that there are procedures in place to effectively manage allegations against all staff members (contained in this policy). In all cases we will follow the guidelines outlined in Part 4 of Keeping Children Safe in Education 2023. All such cases, and in cases of any doubt as to whether the matter reaches threshold for an allegations, advice and guidance must be sought from the local authority designated officer (LADO) BEFORE any internal investigation begins.
7. ensuring that we discharge our responsibilities in respect of adhering to the reporting restrictions imposed by the Education Act 2002 where teachers are under investigation.
8. ensuring parents and carers are aware of their responsibilities not to publish any information during such investigations as highlighted at para 389 Keeping Children Safe in Education 2022 and section 141F of the Education Act 2002
9. recognising that neither the governing body, nor individual governors, have a role in pursuing or managing the processes associated with individual cases of child protection
10. recognising that neither the governing body, nor individual governors, have a right to know details of such cases, except when exercising their disciplinary functions in respect of allegations against staff
11. making sure all staff are familiar with the contents of part 1 of Keeping Children Safe in Education, and that all staff have been trained appropriately and that this is updated in line with guidance
12. ensuring that the school is contributing to inter-agency working, which includes providing a coordinated offer of early help assessment when additional needs of children are identified
13. appointing a designated teacher for looked after children, and recognising and reflecting in school procedures and this policy that children looked after are particularly vulnerable
14. for digital-learning, making sure that appropriate filters and appropriate monitoring systems are in place safeguarding against potentially harmful and inappropriate online material

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<sup>2</sup> The NSPCC / TES safeguarding self-assessment is regarded by the Local authority as a useful tool for this purpose

<https://www.nspcc.org.uk/services-and-resources/working-with-schools/esat/>

15. giving consideration as to how children may be taught about safeguarding including: online, through teaching and learning opportunities and as part of providing a broad and balanced curriculum (A member of SLT should be responsible for ensuring appropriate learning occurs with Schemes of Work etc.)
16. ensuring that the academy creates a culture of safe recruitment and as part of that adopt recruitment procedures that help deter, reject or identify people who might abuse children (Part 3: Safer Recruitment. Keeping Children Safe in Education, September 2023). This includes ensuring that at least one member of any appointing panel, including at shortlisting, will have attended safer recruitment training. It is recommended that potential new staff are subject to digital screening to look for any information publicly available regarding concerning issues or incidents that may need exploring at interview.
17. ensuring that the school keeps an up to date single central record (SCR) of all staff and volunteers and the dates of all appropriate safeguarding checks and including the detail as suggested within Part 3 of Keeping Children Safe in Education, September 2023.
18. monitoring the adequacy of resources committed to child protection and the staff and governor training profile ensuring the academy follows the correct procedure for managing professional differences where there is disagreement between the school and other agencies in respect of action taken to keep a child safe.
19. governors will ensure they are trained annually in respect of safeguarding. Governors will also consider what other bespoke training, for example Prevent, would enable them to fulfil their governance obligations.

Disqualification by association criteria does not now apply to those working in schools or colleges and as such we will no longer ask our staff to provide details of those living in the same household cautioned or convicted for certain offences.

### **Responsibilities of Designated Safeguarding Lead (DSL)**

In each academy, any individual can contact the designated safeguarding lead if they have concerns about a child.

The Designated Safeguarding Lead at Warden Park Secondary Academy is:

**Mark Sorrell**                      Date trained: September 2022 (refresher)

The Deputy Safeguarding Leads at Warden Park Secondary Academy are:

Dom Kenrick                      Date trained: September 2023 (refresher)

Debbie Wheeler                      Date trained: October 2023 (refresher)

Robbie Atwell                      Date trained: September 2023 (refresher)

Matt Kelly                      Date trained: September 2023 (refresher)

Harriet Brooker            Date trained: September 2022 (full training)

Michelle Hale             Date trained: September 2022 (full training)

The Designated Safeguarding Lead at Warden Park Primary Academy is:

**Elizabeth Brodie**        Date trained: March 2023 (refresher)

The Deputy Safeguarding Leads at Warden Park Primary Academy are:

Gwen Durnford            Date trained: October 2022 (refresher)

Angela Baxter             Date trained: February 2023 (refresher)

Hannah Dodd             Date trained: July 2023 (refresher)

The Designated Safeguarding Lead at Northlands Wood Primary Academy is:

**Mark Sears**                Date trained: July 2023 (refresher)

The Deputy Safeguarding Leads at Northlands Wood Primary Academy are:

Paul Johnson              Date trained: October 2022 (refresher)

Kath Cheesmur             Date trained: November 2023

The Designated Safeguarding Lead at Woodgate Primary Academy is:

**Sarah Neller**                Date trained: September 2023

The Deputy Safeguarding Leads at Woodgate Primary Academy are:

Ruth Whaley              Date trained: March 2023

Jenny Bird                 Date trained: June 2022

The Designated Safeguarding Leads at Chichester Free School are:

**Lee Hardwick**             Date trained: June 2023

**Cathryn Halton**            Date trained: September 2023

**Alanya Russell**            Date trained: September 2023

The Deputy Safeguarding Leads at Chichester Free School are:

Fiona Dabinett             Date trained: January 2023

Alison Turnbull            Date trained: September 2023

Alexa Angell                Date trained: January 2020

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated.

**The designated safeguarding lead will:**

- a. assist the governing body in fulfilling their responsibilities under section 175 or 157 of the Education Act 2002
- b. attend initial training for their role and refresh this every two years
- c. keep their knowledge and skills updated at least annually
- d. ensure that all staff know who the designated safeguarding lead is, their role and how to make contact
- e. ensure that all staff understand their responsibilities in relation to signs of abuse and responsibility to refer any concerns to the designated safeguarding lead. In addition, the designated safeguarding lead should ensure that all staff read and understand Part 1 of Keeping Children Safe in Education 2023 and have a record of when this was done
- f. ensure that new staff participate in safeguarding training as part of their induction and that all staff receive safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children.
- g. be the lead for the school when engaging the managing professional difference protocol when there is disagreement between the school and other agencies in respect of action taken to keep a child safe.
- h. liaise with relevant curriculum leads in setting to ensure education for safeguarding is considered within all aspects of the curriculum
- i. refer cases of suspected abuse to the West Sussex IFD . Where a referral is made that notes are completed that same day
- j. support staff who make referrals to local authority Children's Social Care



- k. refer cases to the Channel programme where there is a radicalisation concern as required
- l. support staff who make referrals to the Channel programme
- m. refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- n. refer cases where a crime may have been committed to the police, via the IFD as required.
- o. ensure all child protection files are kept separately and securely from other records and accessible only by staff who need to access them for safeguarding purposes.
- p. liaise with the headteacher to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigation
- q. as required liaise with the case manager and where required the LADO, in all cases involving allegations against members of staff (both current and former members of staff)
- r. liaise with staff on matters of safety and safeguarding, and when deciding whether to make a referral by liaising with relevant agencies
- s. act as a source of support, advice and expertise for staff.
- t. arrange for any child to be accompanied by an appropriate adult if they are to be investigated by the Police

### **Training**

- a. as well as training all members of staff as above, the DSL and deputies should undergo training to provide them with the skills required to carry out the role. This training should be updated at least every two years.
- b. the DSL and deputies should undertake Prevent Awareness training and ensure the rest of the staff also do this on at least an annual basis as part of the wider continuous safeguarding training process in operation.

## **Designated Safeguarding Lead – continual professional development**

The DSL should be afforded time by the Headteacher or Chair of Governors to allow them to keep up to date with any developments relevant to their role, including:

- a. attending the DSL network termly meetings as organised by the Local Authority
- b. understanding the assessment process for providing early help assessment and intervention for example, through locally agreed common and shared assessment processes such as early help assessments.
- c. maintaining 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
- d. being alert to the specific needs of children in need, those with special educational needs and young carers
- e. keeping detailed, accurate, secure written records of concerns and referrals separately from the main pupil file and use these records to assess the likelihood of risk. The written records should clearly identify details of the concerns and what action was taken. If these are stored electronically ensure that they are differently password protected from the child's other files and accessible only by the headteacher/DSL <sup>(see below)</sup>
- f. supporting the academy with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- g. obtaining access to resources and attend any relevant or refresher training courses
- h. encouraging a culture of listening to children and taking account of their wishes and feelings among all staff, in any measures the academy may put in place to protect them
- i. ensuring that where a pupil/student transfers school and is on a Child Protection Plan or is Looked After, the information is passed to the new school immediately and the child's social worker informed

- j. acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- k. ensuring that either they, designated pastoral leader or the class teacher attends Child Protection conferences, core groups or other multi-agency planning meetings, contributes to assessments and provides a report which will normally have been shared with the parents/carers
- l. ensuring that any child who is subject to a child protection plan and who is absent without explanation is referred to their key worker's social care team. In some cases any absence may be a cause for concern and warrant immediate reporting
- m. ensuring the academy's child protection policy is reviewed annually, the procedures and implementation are updated and reviewed regularly and work with governing bodies or proprietors regarding this
- n. being responsible for making the senior leadership team aware of trends in behaviour that may affect child welfare.

## **8 Early help assessment & Child Protection Procedures**

If a child is in immediate danger the police must be called by dialling 999.

If a member of staff has concerns about a child:

- a. the member of staff will report their concerns to the designated safeguarding lead or in their absence, the deputy safeguarding lead.
- b. the designated safeguarding lead will decide whether the concerns should be referred to the Multi-Agency Safeguarding Hub (IFD). If there are grounds for actual or suspected significant harm then a referral will be made to the IFD via telephone in the first instance. If the designated safeguarding lead is unsure about whether a referral is required they should contact the IFD by telephone for advice.
- c. if it is decided to make a referral to the IFD this will usually be discussed with the parents/carers, unless to do so is likely to place the child(ren) at further or increased risk of harm or could impact on a police investigation. Advice on whether to inform parents/carers of the referral **MUST BE SOUGHT FROM IFD before** informing the parent/carer

- d. they will make an accurate and detailed recording (which may be used in any subsequent court proceedings) as soon as possible and on the same day using the Academy 'reporting a concern' form. The signed and dated recording must be a clear, precise, factual account of the observations. Do not add comments or opinions although observations about a child's demeanour or emotional state may be recorded.
- e. the IFD will require a follow up of any phone call in writing from the referrer. The designated safeguarding lead will ensure that any written referrals are made using the Request for Support form available.
- f. the school child protection records must reflect who was spoken to at IFD, the time and date of that contact. The school child protection records must also clearly record any advice given and what steps the school have taken.
- g. particular attention will be paid to the attendance and development of any child for whom the school has concerns, or who has been or is the subject of a Child Protection Plan.

### **Information Sharing**

If a member of staff is in doubt whether to share information please take advice from IFD . Further advice on the seven golden rules for sharing information can be found in Advice for practitioners providing safeguarding services to children, young people, parents and carers and guidance, which can be accessed [here](#).

### **Taking Responsibility**

- a. staff should not assume a colleague or another professional is making a referral. It is the duty of the designated lead to act and ensure information is shared in order to keep a child safe.
- b. In addition, each academy will ensure that all staff, including volunteers and governors, know how to contact IFD in the unlikely event that the DSL or deputy are not available. This will also be the case where any member of staff is concerned that the DSL or deputy is not taking concerns seriously.
- c. In addition, we encourage all members of staff, including volunteers and Governors, to recognise and respond to safeguarding concerns which occur in the community

and are nothing to do with school in the appropriate manner by contacting IFD or the NSPCC.

### **Early help assessment**

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

- a. is disabled and has specific additional needs;
- b. has special educational needs (whether or not they have a statutory education, health and care plan);
- c. is a young carer;
- d. is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- e. is frequently missing/goes missing from care or from home;
- f. is misusing drugs or alcohol themselves;
- g. Is at risk of modern slavery, trafficking or exploitation;
- h. is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- i. has returned home to their family from care;
- j. is showing early signs of abuse and/or neglect;
- k. is at risk of being radicalised or exploited;
- l. is a privately fostered child.

All West Sussex schools and colleges have an allocated early help assessment worker, available via the local early help assessment hubs. A list of which is found [here](#) Our academies will work with our early help assessment workers in order to maximise support for those children who may benefit from additional support.

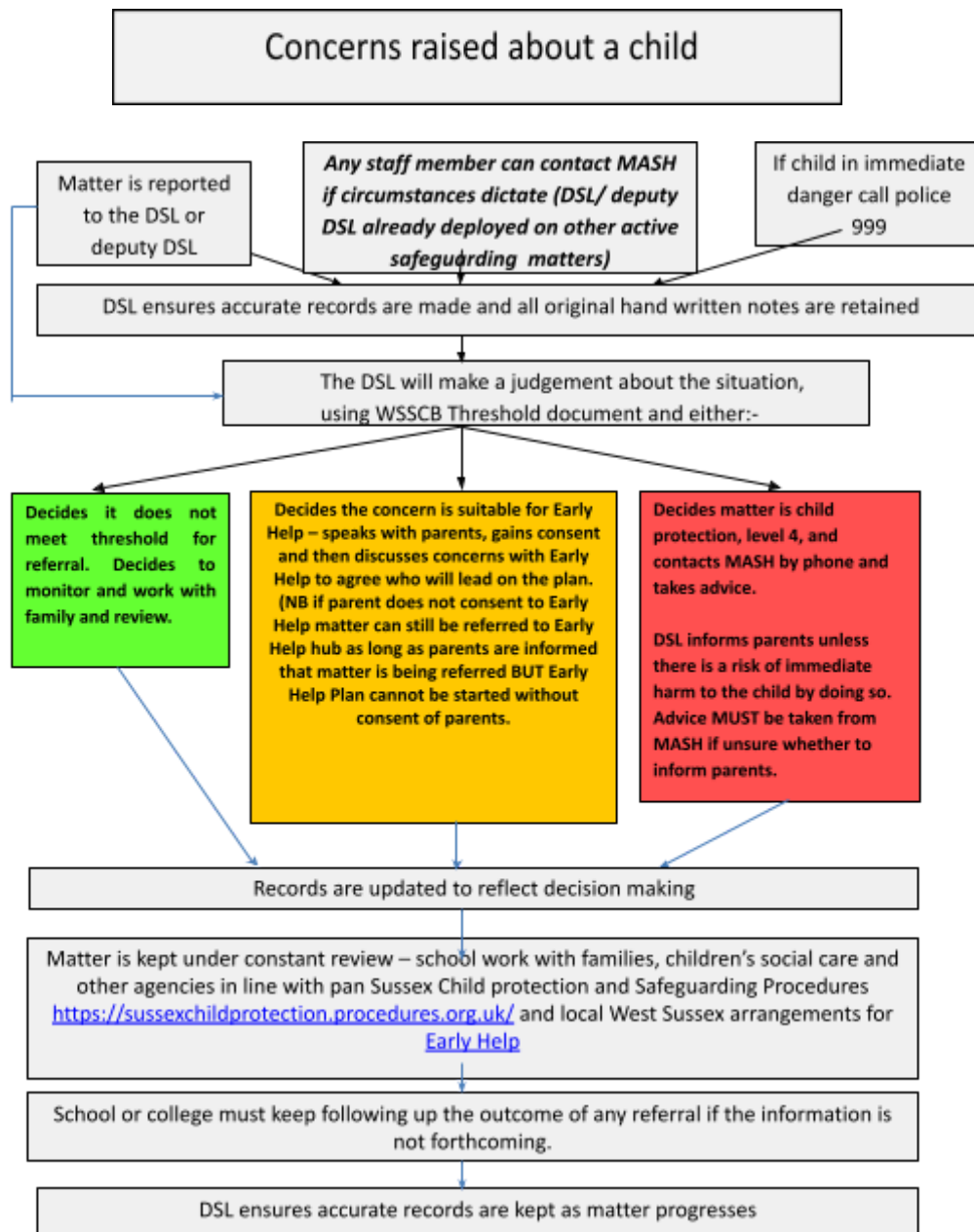
## **9 West Sussex Safeguarding Children Partnership**

### **Continuum of Need / Threshold Guidance**

Each academy will use the Threshold Guidance found [here](#) to inform our decision making and which referral pathway to take.

See flowchart below.

## Flowchart for child protection procedures for schools and colleges (For 'MASH' read IFD)



## 10 Local Authority designated officers (LADO)

### LADO Contact Details

- The LADO for West Sussex are **Miriam Williams, Donna Tomlinson and Victoria Williams**
- Consultation Contact Number: 0330 222 6450 (Available 09.00 – 17.00)
- LADO Service Contact Number: (Available through the IFD ) 01403 229900
- LADO Service email address: LADO@WestSussex.gov.uk

## **11 If a member of staff has concerns about another staff member**

- a. this applies to any member of staff/volunteer/ Governor or Trustee whom the staff member has contact with in their personal, professional or community life.
- b. an allegation is any information which indicates that a member of staff/volunteer may have:
  - i. behaved in a way that has, or may have harmed a child
  - ii. possibly committed a criminal offence against/related to a child
  - iii. behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children.
- c. if staff have concerns about another staff member then this should be referred to the Headteacher. If the allegation is against the headteacher, then the referral should be made to the Chair of Governors. If for any reason this causes a delay, then the local authority designated officer (LADO) should be approached directly.
- d. the person to whom an allegation against another member of staff is first reported, should take the matter seriously and keep an open mind. They should not investigate or ask leading questions if seeking clarification. It is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

## **12 School Complaints**





Complaints by parents about any aspect of school MUST be reviewed to ensure there are no allegations against staff contained within the complaint which require referral to LADO.

## **13 Allegations against member of staff, including volunteers, Governors or Trustees**

- a. An immediate written record of the allegation using the informant's words including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present, will be made.

- b. This record should be signed, dated and immediately passed on to the headteacher/chair of governors
- c. The recipient of an allegation must not unilaterally determine its validity and failure to report it in accordance with procedures is a potential disciplinary matter. The Headteacher or Chair will not investigate the allegation themselves, or take written or detailed statements, but will assess and decide whether to refer the concern to the LADO. If there is any doubt as to whether to refer, advice should be taken from the LADO.
- d. If there are concerns that a child is at risk, the matter must be immediately reported to IFD .
- e. Any records generated in the course of such matters must be retained securely, away from other child protection and personnel records and only be accessed by those who need to for investigation / review purposes.
- f. Guidelines contained within the Pan Sussex Child Protection and Safeguarding Procedures in respect of managing allegations made against people who work or volunteer with children, found [here](#) , must be followed on each occasion. If there is any doubt then advice must be taken from the LADO.

#### 14 Flow Diagram – LADO referrals

Concerns raised about a member of staff		
Concerns passed to DSL		DSL informs <u>Headteacher</u> and contacts LADO. LADO gives advice on next steps.
If concerns relate to DSL		Staff go directly to <u>Headteacher</u> . <u>Headteacher</u> contacts LADO who gives advice on next steps.
If concerns relate to <u>Headteacher/Principal</u>		Staff go directly to DSL who contacts LADO who gives advice on next steps.
If concerns relate to <u>Headteacher/Principal</u> who is also DSL		Staff go directly to LADO who gives advice on next steps.



## **15 What staff should do if they have concerns about safeguarding practices**

- a. all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the academy's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.
- b. An appropriate whistleblowing policy is in place, and are suitably reflected in staff training and staff behaviour policies, for such concerns to be raised with the academy's senior leadership team.
- c. where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
- d. advice can be taken from LADO

## **16 Whistleblowing/ Confidential reporting**

The Trust has a separate [Whistleblowing Policy](#).

We will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the actions or attitudes of colleagues. If necessary the member of staff can speak with the Headteacher, the Chair of Governors or with the LADO.

We will ensure staff should be aware of and know how to access the Sussex Learning Trust Whistle blowing Policy, and that further assistance for staff to raise concerns can be accessed by calling the NSPCC whistleblowing helpline on 0800 028 0285.

## **17 Special Educational Needs & disabilities (SEND)**

Each academy is aware that children with SEND can face additional safeguarding challenges and expect all staff to recognise:

- a. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- b. being more prone to peer group isolation than other children;
- c. the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- d. communication barriers and difficulties in overcoming these barriers.

## **18 Children looked after, previously looked after children and those children with social workers**

- a. The Governing Body of each academy will ensure that staff have the skills, knowledge and understanding to keep looked after children and those with Social Workers safe.
- b. In particular we will ensure that appropriate staff:
  - have the information they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental/caring responsibility.
  - respond quickly to unauthorised absence or missing education where there are known safeguarding risks.
  - provide pastoral and/or academic support
- c. The designated safeguarding lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
- d. We recognise a previously looked after child potentially remains vulnerable and we will ensure that all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with children who are looked after and previously looked after children, we will ensure each academy works together with other agencies and takes prompt action when necessary to safeguard these children, who are a particularly vulnerable group.
- e. Each academy will work with the virtual school head to discuss how the school can best support the child and meet the needs of the child's personal education plan and use any additional resources accordingly.

## **19 The use of reasonable force in our academy**

Keeping Children Safe in Education 2023 recognises that there are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Such events should be recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in the 'Team Teach' technique.

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.

## **20 On-line safety**

Each academy recognises the use of technology has become a significant component of many safeguarding issues<sup>3</sup>. Child sexual exploitation; Child criminal exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

Each academy has an effective and proactive approach to online safety and educates the whole academy community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate. It also empowers children and young people to make informed choices and keep themselves safe online.

### **Filters and monitoring**

The Governing Body will do all it reasonably can to limit children's exposure to the risks outlined above from the academy's IT system. We will ensure the academy has the appropriate filters and monitoring systems in place. The LGB will consider the prevent duties when identifying what filters and monitoring to adopt. It will also consider the advice given by the UK Safer Internet Centre, found [here](#) and the Department for Education [filtering and monitoring standards](#).

Each academy will also consider further guidance contained within Keeping Children Safe in Education 2023, in respect of procurement decisions regarding what system to adopt.

Each academy will also ensure that all staff receive training in relation to filtering and monitoring on at least an annual basis.

### **Mobile devices**

Our academies recognise that many children have unlimited and unrestricted access to the internet via 3G and 4G in particular and each academy will carefully consider how this is managed on our premises and issue specific guidance for pupils and staff in respect of this.

### **Reviewing online safety**

Our governing bodies understand that technology in this area evolves and changes rapidly and we will therefore keep the matter under regular review, by for example, using a relevant assessment tool found [here](#).

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<sup>3</sup> See appendix for forms of on-line vulnerabilities.

## Education

As academies we recognise we have many opportunities to teach safeguarding, including online. We are aware of the following resources which could support our academies. A wide variety of teaching and learning resources are available both locally and nationally. Some of these are;

- a) UKCCIS have published their Education for a connected world framework. Online safety is a whole school issue. The framework aims to support the development of the curriculum and is of particular relevance to PSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond and to be central to a whole school approach to safeguarding and online safety. It covers early years through to age 18. That is accessed [here](#)
- b) The PSHE Association provides guidance to schools on developing their PSHE curriculum including online safety –Accessed [here](#)
- c) Parent Zone and Google have developed Be Internet Legends a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils. Accessed [here](#)
- d) With the increase of remote learning, in particular due to the COVID-19 pandemic, staff are updated on appropriate guidance to protect themselves and also how to educate their students. Using guidance such [NSPCC](#)

## Staff Training

Our Governors recognise the need for staff to undergo regularly updated safeguarding training and the requirement to ensure our children are taught about safeguarding, including online. Online safety training for staff will be integrated, aligned and considered as part of our overarching safeguarding approach. It will also be considered within our teaching and learning policy and practice.

## 21 Host families - homestay during exchange visits

- a. Our academies are committed to following the recommendations as set out in Keeping Children Safe in Education 2023 for any exchange visit for our students.
- b. We will follow the guidelines and undertake the relevant DBS and overseas checks where relevant prior to any visit taking place.
- c. We will also conduct appropriate risk-assessments for any such exchange visits.

## 22 Private fostering

- a) Our academy recognises that private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of academy staff through the normal course of their interaction, and promotion of learning activities, with children.
- b) each academy will notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.
- c) we will ensure our staff are aware of the link to comprehensive guidance on the circumstances in which private fostering may arise can be found at [here](#).
- d) we will ensure the Pan-Sussex Child Protection and Safeguarding Procedures regarding private fostering can be found [here](#) and will be followed where private fostering is known or believed to be taking place.

## 23 Specific Safeguarding Issues

### Children in the court system

#### Criminal Court

Our academies will do all they can to support any of our children who are required to attend court to give evidence in criminal court. We recognise that maybe because crimes were committed against them or for crimes they have witnessed. The age appropriate guide to support children 5-11-year olds, accessed [here](#) and 12-17 year olds [here](#).

#### Pre-trial therapy

Our academies will always do all we can to support our pupils, which includes providing counselling and other types of therapy. We are aware however that where the pupil is a witness in a criminal trial we must ensure relevant guidelines are followed – which can be found [here](#). In any such situation we will be guided by the police in respect of provision of any therapy before trial.

#### Child Missing Education

Our academy will always inform WSCC when intending to remove a child from our roll.

#### Absence from school

- a. where children do not turn up for school we will follow our attendance policy.

- b. we will ensure we have more than one parent / carer contact number for each pupil.
- c. where a child has not attended and we are unable to contact any parent or carer we will consider the matter from a safeguarding perspective.
- d. in particular, we will consider if there are any existing child protection or safeguarding concerns for the child – if there are we will notify the relevant agency of the absence immediately.
- e. We will also consider if there are any other special circumstances, for example, child or parent disability that may make it difficult for them to make contact with health or other services if they needed to, especially in times of emergency.
- f. if there any concerns our school or college will consider making a home visit and contacting the IFD .
- g. if there are significant concerns we will contact the police immediately.

## **24 Child Sexual Exploitation (CSE)**

- a. Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship.
- b. the perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.
- c. where there are concerns a child may be at risk of CSE, advice **MUST** be taken from IFD

- d. schools and academies play a vital role in keeping children safe from CSE and often have more information than any other agency. Where our academy staff have concerns they will be persistent in referring those concerns, and escalate using the professional difference protocol if necessary.

## **25 Child Criminal Exploitation (CCE) including County Lines**

- a. CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence
- b. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.
- c. where there are concerns that a child may be at risk of CCE advice MUST be taken from IFD .
- d. County Lines are a form of CCE. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Children can be targeted and recruited into county lines in a number of locations including schools in order to move drugs and money between locations.
- e. Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#)

## **26 Domestic Abuse**

Our academies recognise the definition of domestic abuse to be any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Other principles:

- Children who witness domestic abuse are also victims.
- Witnessing domestic abuse can have lasting impact on children and
- Children can also be victims in their own relationships.

Any concerns regarding domestic abuse will be considered by the designated safeguarding lead or deputy and advice and guidance obtained from IFD .

Each academy is informed of Domestic Abuse incidents via [Operation Encompass](#). All incidents are recorded and stored securely. If deemed appropriate the student who has either witnessed or is linked to the domestic abuse, will be given support within the academy.

### **Homelessness**

Each academy recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. (see appendix for further guidance)

### **27 So Called Honour Based abuse – including Female Genital Mutilation**

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

### **Actions**



If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy) who will in turn contact the IFD .

**Female Genital Mutilation (FGM)** – see appendix for further guidance.

Our academies will refer to IFD any suspicion of FGM taking place or intended to take place.

**Forced Marriage (FM)** – see appendix for further guidance

Our academies will refer to IFD any suspicion of FM taking place or intended to take place.

**Preventing radicalisation, ‘Prevent’ and ‘Channel’** – see appendix for further guidance.

Our academies will refer to IFD , Prevent & Chanel any suspicion of radicalisation taking place or intended to take place.

## **28 Child on child Abuse**

- a. in our academies we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students
- b. we recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s behaviour policy or anti -bullying policy in the first instance.
- c. however, we recognise that some allegations may be of such a serious nature that they may raise safeguarding concerns
- d. all staff should be aware that safeguarding issues can manifest themselves via child on child abuse. This may include physical abuse, emotional abuse, sexual abuse and sexual exploitation and may manifest as (though not limited to): bullying (including cyber-bullying), gender based violence/sexual assaults, upskirting and sexting. Such child on child abuse may take many different forms and present in many different ways – see below. All academy staff must be aware that children can be abusers and any concerns should be discussed with the designated safeguarding lead.
- e. if child on child abuse is suspected staff should follow section 8.7 of the West Sussex Child Protection and Safeguarding Procedures - [Children who Harm Other Children](#).

## 29 Preventing child on child Abuse

Our academies will minimise the risk of allegations against other pupils by:

- a. providing a developmentally appropriate PSHE education syllabus which develops students' understanding of consent, acceptable behaviour, keeping themselves safe and healthy relationships.
- b. having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- c. delivering targeted work on assertiveness and keeping safe to those children identified as being at risk
- d. developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils.
- e. how allegations of child on child abuse will be recorded, investigated and dealt with;
- f. clear processes as to how victims, perpetrators and any other child affected by child on child abuse will be supported;
- g. a clear statement that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”;
- h. recognition of the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all child on child abuse is unacceptable and will be taken seriously;

(See appendix for more guidance on ‘child on child’ abuse)

## 30 Mental Health

- a. All staff are made 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.
- b. staff will observe children day-to-day and pass on any concerns to the pastoral leaders of the academy who will consult with the DSL if needed, unless there is an immediate safeguarding concern and then the DSL will need to be contacted.
- c. it is not the responsibility of staff to make a diagnosis, that remains the role of trained professionals, but staff will refer student concerns to the appropriate external support.
- d. The Department for Education has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#) . In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people’s emotional health and](#)

[wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol

### **30 Serious Violence**

- a. All staff in the academy are made aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.
- b. the associated risks and understand the measures in place to manage these. Further advice is available in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

### **31 Sexual Violence and Sexual Harassment between Children in Schools and Colleges**

Our academies recognise that sexual violence and sexual harassment is completely unacceptable and can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

#### **Staff should be aware of the importance of:**

- a. making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- b. not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- c. challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### **32 Upskirting**

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

Staff should challenge and report such behaviour to the DSL and not dismiss it as “banter”, “part of growing up”, “boys will be boys” or “just having a laugh”.

Victims should also be supported through the pastoral system.

See appendix for further advice on Sexual violence and sexual harassment

### **33 Youth Produced Sexual Imagery or ‘Sexting’**

- our academies recognise that ‘Sexting’ is a safeguarding risk to our children. Any incident of youth produced sexual imagery which comes to the attention of any staff within our academy will be referred to the designated safeguarding lead and Digital safeguarding lead straightaway.
- our academies recognise that responding to such cases can be complex and as such our academy has adopted the UK Council for Child Internet Safety (UKCCIS) guidance, as recommended by West Sussex Safeguarding Children Partnership, in responding to and managing such instances.
- that UKCCIS can be found [here](#)
- For further advice in respect of managing cases of sexting or where there is any doubt about whether to refer a case, the advice of IFD should be obtained as soon as possible.

### **34 Children with family members in prison**

Our academies are aware of the additional challenges faced by children who have a parent / carer sent to prison. We recognise that these children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to

support professionals working with offenders and their children, to help mitigate negative consequences for those children and our academy will work in accordance with that guidance, found [here](#), in supporting children in our school who have a parent or carer in prison.

### **35 Bullying and Emotional Health & Well-being**

#### **Bullying including cyberbullying.**

Our academies have anti-bullying strategies which are used by all staff. National guidance on anti-bullying can be found [here](#).

#### **Emotional Health and Well-being**

- a. we support our student's emotional health and where necessary seek the advice and support of our local early help assessment hub and in particular the Youth Emotional Support (YES) programme. Details of which can be found [here](#) .
- b. our academies will make use of national guidance which can be found [here](#).
- c. Public Health England have also published a whole school and college approach for Promoting children and young people's emotional health and wellbeing which we will make use of. That guidance can be found [here](#).

### **36 Dealing with a disclosure**

We are determined that our academies will be a safe places where children feel able to talk to a trusted adult if they are concerned.

We are also determined that all staff, including volunteers, will know how to respond appropriately should a child disclose to them.

#### **If a child discloses:**

- a. accept what the child says
- b. stay calm, the pace should be dictated by the child without them being pressed for detail. DO NOT ASK LEADING QUESTIONS such as "did x touch you there?" It is our role to listen - not to investigate
- c. If more information is needed to establish if there has been abuse use open questions such as "describe what happened?" "tell me what happened?"
- d. use age appropriate words; avoid jargon or terms the child may well not understand.

- e. be careful not to burden the child with guilt by asking questions like “Why didn’t you tell me before?” but you could ask ‘Have you spoken to anyone else about this?’
- f. acknowledge how hard it was for the child to tell you
- g. do not criticise the perpetrator, the child might have a relationship with them
- h. do not promise confidentiality, but reassure the child that they have done the right thing, explain whom you will have to tell (the designated lead) and why and, depending on the child’s age, what the next stage will be. It is important that you avoid making promises that you cannot keep such as “I’ll stay with you all the time” or “it will be all right now.”
- i. If you are in any doubt as to whether to refer the matter on, speak and discuss with IFD .

#### **When recording information:**

- a. any records made may well be used
- b. make detailed notes at the time or immediately afterwards; record the date, time, place and context of disclosure or concern. Record facts and what was said but not your assumption or interpretation.
- c. if it is observation of bruising or an injury record the detail, e.g. “right arm above elbow”.
- d. use skin / body maps if necessary.
- e. do not take photographs
- f. note the non-verbal behaviour and the key words in the language used by the child (try not to translate into ‘proper terms’).
- g. record the date, time and location where the notes were made and if anyone else was present.
- h. pass the notes as soon as possible to your designated safeguarding lead.

#### **Reporting Forms**

- a. Reporting forms should be readily available to all staff who may require them. Staff should not have to print forms off before being able to complete them.
- b. Reporting forms should be located together with the latest copies of Keeping Children Safe in Education, Confidential Reporting Policy and the schools’ child protection and safeguarding policy, at various easily accessible points through the school.
- c. Skin / body maps for recording the information are available from the DSL or DDSL

#### **Support for staff**

It is recognised that staff working in a 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 academy will support such staff by providing an opportunity to talk through their anxieties with the designated safeguarding lead and to seek further support as appropriate. Sussex Learning Trust staff have access to support via the 'Health Assured' employee assistance programme, which can be accessed online – [www.healthassuredeap.co.uk](http://www.healthassuredeap.co.uk) or via telephone – 0800 030 5182.

### **36 Record keeping**

#### **Child Protection Files**

- a. records kept for child protection purposes must be kept securely, separate from other records and accessed only by those who need to do so for safeguarding and / or monitoring purposes.
- b. each child should have a separate record.
- c. each record must be accurate, legible and entries made as soon as practicable after a concern is raised.
- d. where computer systems are used, staff must still have access to paper forms so immediate conversations with a child / body map drawings etc. can be made contemporaneously.
- e. any paper records generated must be retained within the file, even where they have been scanned to a computer record.
- f. where there is more than one sibling, each sibling should have their own record, cross-referenced where necessary to their siblings.
- g. each file should have a chronology to enable assessment.
- h. each file should have an up to date contact number for other key professionals.

#### **When a child moves school**

- a. Any child protection files relating to that child must be transferred / retained in accordance with guidelines which can be found [here](#)
- b. In line with statutory guidance (KCSIE '23) where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible (within 5 days for in-year transfers or within the first 5 days of a new school term), ensuring secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENDCOs or the named person with oversight for SEN in a college, are aware as required.

- c. In addition to the child protection file, the designated safeguarding lead should also consider if 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 that support in place for when the child arrives.

### **Allegations against Staff Records**

- a. any records generated in respect of an allegation must be kept securely, accessed only by those who require to do so for legitimate investigation / safeguarding / review purposes.
- b. any records must be kept separate from any other personal file relating to that staff member
- c. any records must not be kept in any child's child protection file.
- d. this includes allegations against supply staff. Agencies should be kept fully informed and cooperate with any investigation.

### **37 Managing professional differences & concerns**

This is a vital tool in keeping children safe – see appendix for protocol and guidance.

### **38 Adult safeguarding procedures**

1. All of the fundamental principles of safeguarding apply equally to adults as well as children. For example safer recruiting, recognising and responding to signs of abuse, referring when there are concerns and accurate record keeping, amongst many others, are all central to effective safeguarding practice.
2. However, the referral route for concerns for those aged 18 and over is different.
3. For education establishments who cater for young people aged 18 and above, or where any other school or college has concerns about a person aged 18 and over, the relevant local statutory guidance is contained within the Sussex Safeguarding Adult Procedures and can be found [here](#).
4. For further advice and guidance in respect of general safeguarding those aged 18 and over can also be found [here](#)
5. To discuss concerns relating to a person aged 18 and over please contact West Sussex Adult Social Care on 01243 642121.



**ANNEXES SUPPORT THIS POLICY AND ARE AVAILABLE TO ALL STAFF [HERE](#)**

## Document Version Control

Date	Version	Comment	Ratified by	Reviewer
30.6.17	2	1.5 values of our British (sometimes referred to as Universal Values) culture	Board of Trustees (12.7.17)	J Morris
25.4.19	3	Complete review	Board of Trustees (22.5.19)	J Morris
2.7.19	4	Separation of policy and appendix.  Inclusion of 'upskirting' as child on child abuse.	CEO	J Morris
1.9.19	5	Annual review update in line with KCSIE '22 '22 2019	Board of Trustees (16.10.19)	J Morris & Heads
1.7.20	6	Annual review update in line with KCSIE 2020 and stylistic/formatting improvements.	Board of Trustees (15.07.20)	J Morris & Heads
14.7.21	7	Reflecting KCSIE 2021 (adding to the title 'Including Allegations Against Staff'  Update of personnel details	Board of Trustees	J Morris & M Sorrell
7.7.22	8	Added 'The wider contexts of safeguarding' (p4)  7b - children may not feel ready or know how to report abuse  Potential recruits to be digitally screened (P12 item 16)  Item 't' P15 - children under Police investigation to be accompanied by an appropriate adult.  Domestic abuse - witnesses also victims (p30) Term 'peer abuse' changed to 'child on child' as contemporary terminology.	Board of Trustees 13.7.22	J Morris & Executive Team

		<p>CP files to be sent to receiving schools/institutions within 5 days of the transfer in the school year or by day 5 of the new school term.</p> <p>updated NWPALink Governor details.</p>		
4/7/23	9	<p>Updated personnel details.</p> <p>Added bullet point q. on Page 12 that highlights staff should be trained in the behaviour policy</p> <p>Updated expectation that all staff receive annual training on filtering and monitoring. (p27)</p>	Board of Trustees 12.7.23	
19/11/23	9.1	Updated DSL Woodgate	Executive Team	
18/04/24	9.2	Updated WPPA Safeguarding Link Governor and NWPALink DSL	Governance Support Officer	