St Paul's CE

Primary School

Child Protection and Safeguarding Policy and Procedures September 2026

Key contacts

Role	Name	Contact details
Designated Safeguarding Lead	Laura Stansfield	01273 721001
Deputy Designated Safeguarding Lead	Julie Stingone	01273 721001
Nominated governor for safeguarding	Andrew Collin	01273 721001
Designated Teacher for children in care or previously in care	Laura Stansfield	01273 721001
Nominated governor for children in care or previously in care	Angie Fantis	01273 721001
Chair of governors	Andrew Collin	01273 290400
Education Safeguarding Officer	Connie Dunhill	conniedundill@brighton-hove.gov.uk
Local Authority Designated Officer	Kay Whitcroft	LADO@enquiroes@brighton-hove.gov.uk
Front Door For Families (MASH, Family Help and Family Information Service)	Emergency Duty Service – after hours, weekends and	01273 335905 or 335906
	Emergency Duty Service – after hours, weekends and public	01273 335905 or 335906

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Child Protection and Safeguarding Policy

1 Introduction

1.1 Safeguarding children and young people is everyone's responsibility. Everyone who comes into contact with children and families has a role to play.

1.2 Our pupils' welfare is our paramount concern. The governing body will ensure that our school will safeguard and promote the welfare of pupils and work together with other agencies to ensure that our school has adequate arrangements to identify, assess and support those children and young people who are suffering or likely to suffer harm.

1.3 Our school is a community and all those directly connected, staff members, governors, parents, families and pupils, have an essential role to play in making it safe and secure.

2 Our Ethos

2.1 We believe that our school should provide a caring, positive, safe and stimulating environment that promotes our school values and the emotional, mental health and wellbeing of the individual child/young person.

2.2 We recognise the importance of the school working in a trauma-informed way, based on the understanding that a child's experiences of adversity and trauma can have long-term impact and leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

2.3 We recognise the importance of providing an environment within our school that will help children and young people feel safe and respected. We recognise the importance of enabling children and young people to talk openly and to feel confident that they will be listened to. We recognise the need to teach children and young people the skills they need to stay safe and to ask for help if they need it.

2.4 We recognise that all adults within the school, including permanent and temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm. We recognise the importance of enabling all adults to share the full range of possible concerns about pupils and about adults promptly

2.5 We will work with parents to build an understanding of the school's responsibilities to ensure the welfare of all children and young people, including the need for referrals to other agencies in some situations.

3 Scope

3.1 In line with the law, this policy defines a child as anyone under the age of 18 years.

3.2 This policy applies to all members of staff in our school, including all permanent, temporary and ancillary staff, governors, volunteers, contractors and external service or activity providers.

4 The Legal Framework

4.1 Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make arrangements for ensuring that their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school. Section 157 of the same Act places a similar duty on non-maintained and independent schools, including free schools and academies.

4.2 Under section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools and academies, are required to cooperate with the local authority to improve the well-being of children in the local authority area.

4.3 Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are required to have "due regard to the need to prevent people from being drawn into terrorism".

4.4 Under section 14B of the Children Act 2004, as amended by the Children & Social Work Act 2017, the Local Safeguarding Partners can require a school or further education institution to supply information in order to perform its functions. This must be complied with. The school is identified as a 'relevant agency'.

4.5 This policy and the accompanying procedures have been developed in accordance with the local and national statutory and non-statutory guidance and procedures. This includes:

4.5.1 *Working Together to Safeguard Children: A Guide to Multi-Agency Working to Help, Protect, and Promote the Welfare of Children, March 2026*

4.5.2 *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (KCSIE), September 2026*

4.5.3 *Pan-Sussex Child Protection and Safeguarding Procedures*

4.5.4 Relationships Education, Relationships and Sex Education (RSE) and Health Education, July 2025

5 Roles And Responsibilities

5.1 The school's lead person with overall responsibility for child protection and safeguarding is the **Designated Safeguarding Lead**. We have 1 **Deputy Designated Safeguarding Lead** to ensure there is appropriate cover for this role at all times, deputies are trained to the same level as the Designated Safeguarding Lead. The Designated Safeguarding Lead is a member of the school's Senior Leadership Team. The Designated Safeguarding Lead's responsibilities are described in Appendix A. A DSL, or Deputy, is always available during school hours/term time for staff to discuss safeguarding concerns and we have robust cover arrangements in place to cover the role of the DSL during any periods of absence.

5.2 The school has a **Designated Teacher for Children in Care and Previously in Care** who has overall responsibility for promoting the educational achievement of looked-after children and previously looked-after children who are no longer looked after in England and Wales because they are the subject of an adoption, special guardianship or child arrangements order, or were adopted from 'state care' outside England and Wales.

5.3 The school has a **nominated governor** responsible for **safeguarding** to champion good practice, to liaise with the head teacher and the Designated Safeguarding Lead to provide information and reports to the governing body.

5.4 The school has a **nominated governor** responsible for **Children in Care and Previously in Care** to champion good practice, to liaise with the head teacher and the Designated Teacher to provide information and reports to the governing body.

5.5 The case manager for dealing with allegations of abuse made against school staff members is the **headteacher**. The case manager for dealing with allegations against the headteacher is the chair of governors. The procedure for managing allegations is detailed in Appendices G and H of this policy.

5.6 The **head teacher** will ensure that the policies and procedures adopted by the governing body are fully implemented and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.

5.7 The **governing body** is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice. Governing bodies and proprietors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency

safeguarding arrangements established by safeguarding partners, as set out in *KCSIE 2026*.

5.8 **All staff members, governors, volunteers and external providers** know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child or young person.

5.9 **All staff members, governors, volunteers and external providers** are able to recognise behaviours which breach the staff code of conduct and know what to do if they are concerned about the behaviour of an adult.

6 Supporting Children and Young People

6.1 We recognise the significant impact of trauma on children and families. We recognise that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and some sense of blame. Our school may be the only stable, secure and predictable element in their lives.

6.2 We accept that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn. We understand the need to work in a trauma-informed way with these children and their families.

6.3 We recognise that children can be at risk in a range of contexts (community, home, school, referred to as contextual safeguarding) and from other children and not just from adults. All staff understand that all children involved in child-on-child abuse need protection and support, including those who are alleged to have caused harm to other children.

6.4 We recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. We recognise how important it is that staff determine how best to build trusted relationships with children which facilitate communication.

6.5 We recognise that serious violence may be associated with exploitation, criminality, county lines activity, trauma and adverse childhood experiences. Staff are alert to indicators and will follow child protection procedures where concerns arise.

6.6 We recognise that the fact a child may be LGBT or may be questioning their gender is not in itself an inherent risk factor for harm. However, risks can be compounded where children lack a trusted adult with whom they can be open. We therefore ensure that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with trusted members of staff.

6.7 We recognise that children who are questioning their gender may have individual vulnerabilities and support needs. The school will take a cautious and child-centred approach, considering the broad range of the child's needs, any risk of bullying, access to trusted adults, and the awareness that working in partnership with parents/carers is the preferred approach. We will follow the guidance set out in KCSIE, 2026, when we manage matters related to gender-questioning children.

6.8 Our school will support all pupils by:

- ensuring the content of the curriculum includes social and emotional aspects of learning, drug, alcohol and tobacco education and relationships and sex education;
- ensuring a comprehensive curriculum response to online safety, enabling children, young people and parents/carers to learn about the risks of new technologies and social media and to use these responsibly;
- ensuring that child protection is included in the curriculum to help children and young people to stay safe in a range of contexts, including online, and to recognise when they do not feel safe and identify who they might or can talk to;
- ensuring that mental and physical health are included in the curriculum and to support children and young people to reduce stigma and develop strategies for self-regulation, perseverance and determination, even in the face of setbacks;
- building resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views;
- ensuring appropriate filtering and monitoring systems are in place and effective to safeguard children when accessing technology;
- ensuring that all adults in school understand that children and young people must be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse of any kind;
- providing pupils with a number of appropriate adults to approach if they are in difficulties;

- supporting the development of children and young people in ways that will foster security, confidence and independence;
- encouraging development of self-esteem and self-assertiveness while not condoning aggression or bullying;
- ensuring all staff understand their responsibility for safeguarding and know what to do if they have a concern for a child or young person's wellbeing;
- ensuring that all staff understand that mental health concerns can, in some cases, develop into safeguarding concerns, and could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation;
- ensuring all staff understand their responsibility for safeguarding and know what to do if they have a concern about the behaviour of an adult;
- ensuring that all staff understand the additional safeguarding issues of children and young people with special educational needs and disabilities and how to address them;
- ensuring that all staff are aware of the Family Help process, and understand their role in it, including acting as the lead professional where appropriate;
- liaising and working together with other support services and those agencies involved in safeguarding children and young people;
- monitoring attendance patterns and reviewing and responding to them as part of welfare and protection procedures;
- actively seek the views of children, young people, parents/carers and staff members on our child protection arrangements through surveys, questionnaires and other means;
- ensuring that staff have strong anti-racism awareness and practices and are aware that trauma related to racism is a safeguarding concern, engaging actively with the Brighton & Hove Anti-Racism Education Strategy;
- monitoring those who have been identified as having welfare or protection concerns and providing appropriate support; and
- participating in Operation Encompass, so that we receive notification from police of domestic abuse incidents involving children (incidents in which a child was present, ordinarily resides at the incident location or

with an involved party); our participation will be publicised on our website.

7 Additional Vulnerabilities

7.1 We recognise that some children may be more vulnerable to abuse, neglect, and exploitation and may require additional support, vigilance, and intervention. These include, but are not limited to, children with SEND, children with a social worker, children who are looked after or previously looked after, young carers, children suffering domestic abuse, children missing education, children who have experienced racism, children who are persistently absent, children at risk of exploitation, children who are LGBT or questioning their gender, and children with mental health needs.

7.2 The presence of a vulnerability does not mean that abuse or other child protection concerns will occur, however staff will be aware of vulnerabilities to allow them to provide support and be vigilant to any arising concerns or needs.

8 Anti-Racism

8.1 We acknowledge that it is not enough to be ‘not racist’. Anti-racist practice is systemic change which means looking at policies, practice, procedures, and services provided, and thinking about whether these actively create equitable voices, outcomes, and value for Black and Racially Minoritised children. We have awareness of the Brighton & Hove Anti-Racist Education Strategy.

8.2 In order to promote an anti-racism environment at our school, we

8.2.1 analyse proportionality data, e.g. suspension or detention data, and share this information with staff and/or the Local Authority, and use this to drive conversation about whether we need to consider developing anti-racism and what we can do to improve proportionality

8.2.2 engaging with whole-staff training via the BHCC Education Anti-Racism Team.

8.2.3 Have a named anti-racist lead in school

8.2.4 gathering meaningful pupil, parent/carer, and staff voice from members of our community who are Black and Racially Minoritised and using this to understand the impact of practice and whether there are systemic issues that need to be addressed

8.2.5 provide cpd opportunities which allow staff to actively reflect upon their own experiences and internalised beliefs which may impact on their anti-racist practice

8.2.6 encourage a working environment where staff feel able to challenge one another on matters pertaining to racism and anti-racism practice, through respectful and restorative approaches

8.2.7 consider recruitment and retention of Black and Racially Minoritised staff, by collecting baseline data and engaging experts on diversity recruitment and retainment

8.2.8 ensuring our leaders are particularly aware of anti-racist practices as well as the impact of racism on both staff and students, through training, assemblies, wider school events.

9 Child Protection and Safeguarding Procedures

9.1 We have developed a structured procedure in line with Pan-Sussex Child Protection and Safeguarding Procedures which will be followed by all members of the school community in cases of suspected abuse. This is detailed in Appendix B.

9.2 In line with the procedures, the Front Door for Families will be notified as soon as there is a significant concern.

9.3 The name of the Designated Safeguarding Lead will be clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.

9.4 We will ensure all parents and carers are aware of the responsibilities of staff members to safeguard and promote the welfare of children and young people and act in their best interests. We will do this by publishing the policy and procedures on our website and by referring to them in our introductory school materials.

10 Record Keeping

10.1 The DSL will ensure that records are maintained appropriately for children and young people with safeguarding concerns. Confidential, stand-alone files will be created and will be accessible only by those who need to see the information.

10.2 At our school we use CPOMSTo which all staff have access to for the purposes of recording concerns they may have about children.

10.3 Records will be factual, accurate, relevant, up to date and auditable. Records will distinguish between fact and professional opinion. Where people are referred to, they will be identified clearly by role. Records will support monitoring, risk assessment and planning for children and enable informed and timely decisions about appropriate action to take.

10.4 Records will include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; a note of any actions taken; a note of any discussions and decisions made, with reasons for those decisions; the outcome of actions.

10.5 We will continue to support any pupil leaving the school about whom there have been concerns by ensuring that all appropriate information, including child protection and welfare concerns, is forwarded under confidential cover to the pupil's new school as a matter of priority. Where appropriate, there may also be a verbal handover of relevant safeguarding information to the new school. The DSL will consider if it would be appropriate to handover in advance of the pupil leaving, to allow the new school or college to continue supporting children who have or have had a social worker and been victims of abuse and plan appropriate support for when they arrive.

11 Safer Workforce and Managing Allegations and Low-Level Concerns Against Staff and Volunteers

11.1 We will prevent people who pose risks to children from working in our school by ensuring that all individuals working in any capacity at our school have been subjected to safeguarding checks in line with the statutory guidance *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2026*.

11.2 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding check on individuals working in our school and that we receive written notification confirming the certificate has been obtained by either the employment business or another such business, in the case of enhanced DBS checks. If there is any information or matter disclosed, we will obtain a copy of the certificate form the agency. We will also ensure that any agency worker presenting for work is the same person on whom the checks have been made.

11.3 Professional visitors, such as Educational Psychologists, Social Workers or Local Authority Officers, will be expected to provide a professional proof of identity. Where necessary we will seek further reassurances from their employers that these persons have suitable DBS clearance etc.

11.4 We will ensure that external organisations and visiting presenters are suitable by assessing the educational value, content suitability, age appropriateness of what will be delivered, and whether relevant checks will be required.

11.5 Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

11.6 We will ensure that at least one member of every interview panel has completed safer recruitment training.

11.7 The headteacher and the DSL are responsible for ensuring that our single central record is accurate and up to date.

11.8 We have procedures in place to handle allegations and low-level concerns against members of staff, supply staff and volunteers in line with *Keeping Children Safe in Education, September 2026* Part Four. This will include referral to the Local Authority Designated Officer and/or the Teaching Regulation Agency when there are concerns that an adult poses a safeguarding risk, has harmed a child, and/or poses a risk of harm to children (see Appendices G and H). Please also see our Staff Code of Conduct.

12 Staff Induction, Training and Development

12.1 All new members of staff will be given an induction which includes child protection training proportionate to their roles and responsibilities. This will include:

- issue and explain the child protection and safeguarding policy
- issue and explain the behaviour policy
- issue and explain the staff behaviour policy and code of conduct
- issue and explain the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- issue part one of *Keeping Children Safe in Education 2026*
- explaining the role of the DSL and sharing the identities of the DSL and DDSLs
- child protection and safeguarding training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring [see Appendix C, Paragraphs 9 and Appendix E], how to respond to concerns, and understanding the impact of trauma)

12.2 The Head Teacher will undergo child protection training, when appointed to post and then refreshed every three years.

12.3 The Designated Safeguarding Lead and any Deputy Designated Safeguarding Lead will undergo child protection training, when appointed to post and then refreshed every two years, for more details see Appendix A.

12.4 All school staff, as part of annual refresher training, will be required to read Part one of *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September, 2026*.

12.5 All school staff, proportionate to their roles and responsibilities, and the nominated safeguarding governor will undergo child protection and safeguarding refresher training annually and will be provided with regular information via the DSL to ensure their skills and knowledge are current. This annual refresher and the ongoing updates will:

- encourage an attitude of 'it could happen here'
- embed a culture where safeguarding is everyone's responsibility
- support staff understanding of the difference between a safeguarding concern and a child in immediate danger or at risk of significant harm
- support staff to understand what to do if a child tells them they are being abused, exploited, or neglected (see Appendix B for Child Protection Procedures]
- support staff to understand that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support
- support staff understanding of Family Help support, including Targeted early help, section 17 support, and section 47 support
- support staff understanding of Best Start Family Hubs and community-based early help
- support staff to understand the procedures and processes for cases relating to abuse, neglect, and exploitation
- support staff to understand the importance of challenging inappropriate behaviours between children that are abusive in nature and to recognise child-on-child harm as a safeguarding concern for all involved
- support staff to understand the process and procedures to follow if they have a safeguarding concern about another staff member
- support staff understanding of relevant safeguarding topics, including online safety, Prevent, and child-on-child harm
- support staff understanding that certain groups of children may be at greater risk of harm and require additional vigilance and support

- inform staff of relevant learning from local and national Child Safeguarding Practice Reviews, local service provision, and local safeguarding concerns
- support and strengthen staff's anti-racist practice, including awareness of the impact of trauma after experiencing racism and intersectionality between race and other protected characteristics

1.2 If staff miss whole-school annual refresher training, they will undertake other relevant training to make up for it, the DSL will be responsible for arranging this.

12.6 All governors and trustees receive appropriate safeguarding and child protection training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Training will be regularly updated.

12.7 All governors, associate members, and clerks will read Keeping Children Safe in Education (2026) Part Two and we will maintain a record of this.

12.8 The nominated governor for safeguarding will undergo additional training prior to or soon after appointment to the role; this training will be updated every two years.

12.9 We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the school.

12.10 We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers, are provided with details of the safeguarding arrangements at our school upon their first day at our school. This will include identification of the DSL and the process for reporting welfare concerns.

12.11 The school will maintain accurate records of satisfactory completion of all staff child protection and safeguarding training, including induction and annual refreshers.

13 Confidentiality and Information Sharing

13.1 We recognise that all matters relating to child protection are confidential.

13.2 The head teacher or the Designated Safeguarding Lead will decide whether any information about a pupil is disclosed to other members of staff on a need-to-know basis, and in the best interests of the child.

13.3 The governing body are aware of the importance of information sharing between practitioners and local agencies.

13.4 All staff members must be aware that they cannot promise a child to keep secrets which might compromise their safety or well-being.

13.5 All staff members have a professional responsibility to share information with other agencies in order to safeguard children.

13.6 All our staff members who come into contact with children/young people will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.

13.7 We will ensure that staff members are confident about what they can and should do under the law, including how to obtain agreement to share information and when information can be shared without agreement. This is covered in greater detail in Appendix B.

14 Multi-Agency Working

14.1 We will develop and promote effective working relationships with other agencies, including agencies providing Family Help services, including social workers, and the police. We recognise that professional challenge has an important role to play in ensuring effective safeguarding.

14.2 We will ensure that relevant staff members participate fully in multi-agency meetings that support particular children and families, including child protection conferences and core groups, child in need network meetings, Team Around the Family meetings, and strategy discussions.

14.3 We will participate in Child Safeguarding Practice Reviews, other reviews and file audits as and when required to do so by the Brighton & Hove Safeguarding Children Partnership. We will ensure that we have a clear process for gathering the evidence required for reviews and audits, embedding recommendations into practice and completing required actions within agreed timescales.

14.4 We will engage with Brighton & Hove Safeguarding Children's Partnership (https://www.bhscp.org.uk/) to receive training and wider learning opportunities, and to develop safeguarding practices in the city.

15 Contractors, Service and Activity Providers, Work Placement Providers, and Alternative Provision

15.1 We will ensure that contractors and providers are aware of our school's child protection and safeguarding policy and procedures. We will require that

employees and volunteers provided by these organisations use our procedure to report concerns.

15.2 We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding check in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, 2026*. If assurance is not obtained, permission to work with our pupils or use our school premises may be refused.

15.3 Under no circumstances will a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity related to children. We are responsible for being aware of, and determining the appropriate level of supervision depending on the circumstances.

15.4 When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.

15.5 When we hire out school premises to organisations or individuals, we will ensure that safeguarding requirements are included in the agreement as a condition of use and occupation of the premises. Where such services or activities are provided under the direct supervision or management of the school, our child protection and safeguarding arrangements will apply. Otherwise, we will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place. We will use *the Department for Education's Keeping children safe in out-of-school settings (February 2026)* to inform what safeguarding arrangements we will require.

15.6 As with any safeguarding allegation against an adult working with children, we will report concerns to the Local Authority Designated Officer (LADO) where the allegation meets the threshold for consultation or referral and relates to an individual or organisation using the school premises for the purposes of running activities for children (see Appendices G and H for more information).

15.7 When sending students on work experience placements, we will ensure that the placement provider has appropriate policies and procedures in place to protect children from harm. We will seek assurance that appropriate safeguarding checks are in place where required, as set out in *Keeping Children Safe in Education September 2026*.

15.8 When the school places a child with an alternative provision provider, the school continues to be responsible for the safeguarding of that child. To fulfil our safeguarding responsibilities, we will:

- use alternative provision from the Local Authority's Alternative Provision Directory

- obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment and that the alternative provider will inform us of any arrangements that may put the child at risk (e.g. staff changes)
- carry out our own safeguarding checks and conduct our own due diligence to ensure that the provision is appropriate for meeting the individual child's needs
- share relevant safeguarding, SEND, medical and risk information with the provider to help them to safeguard and support the child effectively
- hold the address of the alternative provider, any subcontracted provision or satellite sites the child may attend
- ensure there are arrangements and protocols in place for sharing information so that we know where the child is during school hours (i.e. appropriate attendance reporting procedures between the school and the alternative provision provider) and whether any concerns emerge
- conduct reviews at least half-termly to provide assurance that the child is regularly attending, and the placement continues to be safe and continues to meet the child's needs
- have regard to the *Department for Education's statutory guidance on Alternative Provision (February 2025)*
- where safeguarding concerns arise, we will review the placement immediately and terminate if necessary or until those concerns have been satisfactorily addressed. We will also report our concerns to the Local Authority Alternative Provision Commissioning team
- have regard to the *Department for Education's non-school alternative provision: voluntary national standards (August 2025)*

16 Whistle-Blowing and Complaints

16.1 We recognise that children and young people cannot be expected to raise concerns in an environment where staff members fail to do so.

16.2 We will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary, they will speak with the head teacher, the chair of the governing body or with the Local Authority Designated Officer. Should staff not feel able to raise concerns they can call the NSPCC whistleblowing helpline on 0800 028 0285 or emailing help@NSPCC.org.uk

16.3 We have a clear reporting procedure for children, young people, parents/carers and other people to report concerns or complaints, including

abusive or poor practice. This is outlined in our Complaints and Whistleblowing policies. See Appendices G and H for our procedure for managing allegations against members of staff.

17 Site

17.1 All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting concerns that may come to light.

17.2 We check all visitors and volunteers coming into school. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance. Any adults without appropriate checks in place will be accompanied at all times by a member of staff.

17.3 The school will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

17.4 We provide separate toilets for boys and girls aged 4 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time) and will not let children into toilets designated for the opposite biological sex.

17.5 We do not allow children aged 11 and older at the start of the school year to undress in front of a member of the opposite biological sex.

18 Quality Assurance

18.1 We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of child protection files and records by the Designated Safeguarding Lead.

18.2 We will complete an audit of the school's safeguarding arrangements at frequencies specified by the Brighton & Hove Safeguarding Children Partnership and using the audit tool provided for this purpose.

18.3 The school's senior management and the governing body will ensure that action is taken to remedy without delay any deficiencies and weaknesses identified in child protection arrangements.

19 Policy Review

19.1 This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle.

19.2 The Designated Safeguarding Lead will ensure that staff members are made aware of any amendments to policies and procedures.

Appendix A – The Role of the Designated Safeguarding Lead

See also Keeping Children Safe in Education September 2025 Annex C: Role of the designated safeguarding lead.

1 Managing Referrals

1.1 Refer all cases of suspected abuse or harm to the Front Door For Families.

1.2 Refer to families requesting Family Help to Front Door For Families.

1.3 Report incidents to the police where a crime may have been committed.

1.4 Support the headteacher in referral to the LADO where there is a staff-conduct concern.

1.5 Inform the Disclosure and Barring Service where a person is dismissed or left the school due to posing a risk of harm to a child.

1.6 Refer cases to the Channel programme, via preventreferralbandh@thamesvalley.police.uk, where there is a radicalisation concern.

1.7 Refer to other support services, as and when required.

2 Record Keeping

2.1 Keep detailed, accurate, secure written records of child protection and welfare concerns and referrals, within stand-alone files kept confidentially and securely, separately from educational records.

2.2 To record decision making for making referrals, or for not doing so.

2.3 As soon as a pupil with safeguarding concerns moves to another school, liaising with the new school's Designated Safeguarding Lead for information sharing. For complex cases, this may include a summary of the history in the pupil's child protection record. The DSL will ensure the pupil's child protection or welfare concerns records are transferred to new school as soon as possible. These files will be transferred separately from the main pupil file, using secure transit and obtaining confirmation of receipt.

2.4 Where a pupil is transferring to be Electively Home Educated or the destination school is not known, the child protection or welfare concern records will be retained by the school.

2.5 The final school will retain Child Protection files for at least DoB+25 years.

2.6 Where a pupil is joining the school in-year, the DSL will check with their previous school for the existence of any child protection or welfare concerns records.

3 Multi-Agency Working and Information Sharing

3.1 Cooperate with external agencies for enquiries under section 47 of the Children Act 1989.

3.2 Attend, or ensure other relevant staff members attend, child protection conferences, core group meetings and other multi-agency meetings, as required.

3.3 Liaise with other agencies working with the child/young person, share information as appropriate and contribute to assessments.

3.4 Understand and ensure compliance with relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), including how information sharing for safeguarding purposes can be managed alongside these.

3.5 Be a link between the school and the Brighton & Hove Safeguarding Children's Partnership (BHSCP), including being aware of training on offer, sharing opportunities with staff, and engaging in the development of safeguarding practices in the city.

4 Training

4.1 Undertake appropriate training, updated at least every two years, and update knowledge and skills at least annually in order to:

- be able to recognise signs of abuse and how to respond to them, including special circumstances such as Child Criminal Exploitation, Child Sexual Exploitation, Female Genital Mutilation, fabricated or induced illness, radicalisation and the Prevent Duty, etc. and to share such knowledge with the staff body;
- understand the frameworks for local support, including Brighton & Hove's Right Support at the Right Time framework;
- understand the assessment processes within Family Help and statutory intervention;
- have a working knowledge of how the Local Authority conducts initial and review child protection case conferences and contribute effectively to these; and
- be alert to the specific needs of Children in Need, those with Special Educational Needs, those with medical needs, and young carers.
- be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- be able to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.

5 Supporting Staff

5.1 Ensure each member of staff has access to and understands the school's child protection policy and procedures, including providing induction on these matters to new and part-time staff members.

5.2 Organise whole-school child protection training for all staff members annually. Ensure staff members who miss the training receive it by other means, e.g. by joining another school's training.

5.3 Ensure DSLs and other staff with additional safeguarding responsibilities access additional training to keep up-to-date with safeguarding knowledge.

5.4 Maintain accurate records of staff induction and training.

5.5 Link with Brighton & Hove Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

5.6 Encourage a culture of listening to children/young people and taking account of their wishes and feelings in any action the school takes to protect them.

5.7 Support staff to complete referrals.

6 Awareness Raising

6.1 Review the safeguarding and child protection policy and procedures annually and liaise with the school's governing body to update and implement them.

6.2 Make the child protection and safeguarding policy and procedures available publicly and raise awareness of parents that referrals about suspected abuse may be made and the role of the school in any investigations that ensue.

6.3 Provide an annual briefing to the school on any changes to child protection legislation and procedures and relevant learning from local and national Child Safeguarding Practice Reviews.

6.4 Help promote high aspirations and the best possible educational outcomes for children/young people by sharing information with relevant staff and the school/college leadership (whilst maintaining appropriate levels of confidentiality) about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced. This includes: supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children; ensuring that relevant staff know who these children are.

7 Quality Assurance

7.1 Monitor the implementation of and compliance with policy and procedures, including periodic audits of child protection and welfare concerns files once per year.

7.2 Submit a response to the Local Authority Section 175/157 audit once per year, including relevant staff and the governing body whilst completing the response.

7.3 Provide regular reports, including an annual report, to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.

7.4 Take lead responsibility for remedying any deficiencies and weaknesses identified in child protection arrangements.

Appendix B – Child Protection and Safeguarding Procedures

1 Definitions

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

1.2 **Children** means everyone under the age of 18.

1.3 **Child protection** is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online.

1.4 **Child-on-Child abuse** is when children abuse other children and is a safeguarding issue for both the victim and the alleged perpetrator.

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

1.6 **Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.

1.7 **Safeguarding children** is the action we take to promote the welfare of children and protect them from harm. **Safeguarding and promoting the welfare of children** is defined in *Working Together to Safeguard Children* (2026) as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

    .1 Outcome 1: Children, young people and families stay together and get the help they need

    .2 Outcome 2: Children and young people are safe in and outside their homes

    .3 Outcome 3: Children and young people are supported by their family network

    .4 Outcome 4: Children in care and care leavers have stable, loving homes

1.8 **Significant harm** is the statutory threshold that justifies local authority intervention in family life where there are concerns that a child is suffering, or is likely to suffer, significant harm, under Section 31 of the Children Act 1989.

1.9 For more definitions, see *Sussex Safeguarding Child Protection Policy and Procedures*.

2 Categories of Abuse

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

corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

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

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

3 Recognition – what to look for

3.1 There is detailed information about the categories of abuse and risk indicators in 4.3 of the *Sussex Safeguarding Children Procedures*, as well as Annex A of *Keeping Children Safe in Education, 2026*.

3.2 In an abusive relationship, the child may:

- appear frightened of their parent(s)

- act in a way that is inappropriate to their age and development, although full account needs to be taken of different patterns of development and different ethnic groups

3.3 In an abusive relationship, the parent or carer may:

- persistently avoid child health services and treatment of the child's illnesses
- have unrealistic expectations of the child
- frequently complain about or to the child and fail to provide attention or praise
- be absent
- be misusing substances
- persistently refuse to allow access on home visits by professionals
- be involved in domestic violence and abuse
- be socially isolated
- fail to protect the child from harm

3.4 Serious case reviews and Child Safeguarding Practice Reviews have found that parental substance misuse, domestic abuse and mental health problems, sometimes referred to as the ‘toxic trio’, if they coexist in a family could mean significant risks to children. Problems can be compounded by poverty, frequent house moves or eviction.

3.5 Staff are aware of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below):

- drug taking and/or alcohol misuse
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation (including that linked to county lines),
- radicalisation, and
- consensual and non-consensual making or sharing of nudes or semi-nudes

3.6 Children with special educational needs and disabilities can face additional safeguarding challenges both online and offline, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, and without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse

- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

4 What staff do if they have concerns about a child

Staff member	**Actions to take**
Any member of staff, governor, volunteer, contractor or activity provider	• **Always act in the best interest of the child** • Report concerns to the DSL or a Deputy**, as soon as possible, and immediately if there is any immediate risk of harm.** • Staff will log a concern on CPOMS. • A DSL or deputy should always be available. In the exceptional circumstances that they are not, staff will speak to a member of the Senior Leadership Team or contact the Front Door For Families themselves. Staff can contact 999 if a child is at immediate risk. Staff will inform the Designated Safeguarding Lead about what actions have been taken.
Designated Safeguarding Lead or Deputy	**The family or child may need support, but the child is not at risk of significant harm** • The DSL (or another appropriate member of staff) will discuss concerns with the parents/carers (and child if appropriate). • The DSL will use the Right Support at the Right Time Framework Document to identify the level of need. • The DSL may discuss concerns with senior colleagues in another agency, if necessary. • If the child and family appear in need of help at Level 2 of the Framework Document, the school may provide additional support and/or refer the child or their family to other agencies providing

	Family Help services, or other relevant support, with the family's agreement**.** • We will keep the family and child updated with our actions. • The DSL will record all discussions and decision-making on the child's safeguarding file, as described in the earlier Record Keeping section within this policy.
	The child is at risk of significant harm • The DSL will contact the **Front Door For Families** immediately. • The DSL (or another appropriate member of staff) will discuss the concern and the referral with parents/carers prior to making it. This will not be the case in the circumstances that this could be put the child at risk of harm, e.g. by delaying an urgent referral or where informing the parent/carer may put the child at risk of harm. • Having agreement from the family will not prevent the school from making a referral to Front Door for Families in cases of suspected significant harm or risk of significant harm. • If the child is in immediate danger, or a crime may have been committed, the DSL will also contact the police. • We will keep the family and child updated with our actions, as long as it is safe to do so. • The DSL will record all discussions and decision-making on the child's safeguarding file, as described in the earlier Record Keeping section within this policy.

5 Dealing with a disclosure made by a child

If a child discloses that he or she has been abused in some way, the member of staff or volunteer will follow this guidance.

5.1 Listen to what is being said without displaying shock, disbelief, or judgement and accept what is said.

5.2 Only ask questions when necessary to clarify, and without suggesting what the answer might be. Use TED questions "tell me…", "explain to me…", "describe to me…".

5.3 Allow the child to talk freely without interrupting.

5.4 Do not criticise the alleged perpetrator.

5.5 Reassure the child that what has happened is not his or her fault and they did the right thing in telling.

5.6 Do not make promises that you may not be able to keep, including confidentiality, you will need to share information with the designated lead and they may need to share information with Front Door for Families.

5.7 Explain what has to be done next and who has to be told.

5.8 Complete the processes in the table above.

5.9 Dealing with a disclosure from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the Designated Safeguarding Lead.

6 Discussing concerns with the family and the child

6.1 In general, we will discuss any concerns with the child's parents/carers and will keep them updated about any actions that we take, including referrals to other agencies. They need to know that we are worried about their child and what we are doing about it. However, we will not do so if there is reason to believe that this would place the child at greater risk or lead to loss of evidence for a police investigation.

6.2 We may need to seek advice from the Front Door for Families or the police to ensure that neither the safety of the child nor any subsequent investigation is jeopardised by actions we plan to take, such as discussing a concern with a family or a child or making a referral without parent/carer agreement.

6.3 **If a decision is made not to discuss a concern with the child's parents/carers** this will be recorded in the child's child protection file with a full rationale.

6.4 **We will consider the child's wishes and feelings**, if age appropriate, as part of planning what action to take in relation to concerns about their welfare.

6.5 When talking to children, we will take account of their age, understanding and preferred language, which may not be English. We will consider how a disabled child may need support in communicating.

6.6 If concerns have arisen as a result of information given by a child, we will reassure the child but not promise confidentiality.

7 Information Sharing

7.1 It is essential that people working with children can confidently share information as part of their day-to-day work. This is necessary not only to safeguard and protect children from harm but also to work together to support families to improve outcomes for all.

7.2 We understand that we should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's Family Help services, including social work.

7.3 We will have regard to the Information Commissioner's Office guidance on Sharing Information to Safeguard Children and Young People in the Education Sector in the UK (https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/sharing-information-to-safeguard-children-and-young-people-education-sector/) and the Information Commissioner's Office 10 Step Guide to Sharing Information to Safeguard Children (https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/a-10-step-guide-to-sharing-information-to-safeguard-children/).

7.4 When deciding what information to share, we will consider:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised.

7.5 When sharing information, we may summarise or omit information which is not necessary for safeguarding purposes but will be careful not to omit information where it may be relevant to understanding or managing safeguarding risk.

7.6 The school may have to share information about parents or carers, such as their medical history, disability or substance misuse issues, for s. 47 investigations.

7.7 We will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support children.

7.8 The Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) are not barriers to sharing information. They are designed to ensure that personal information is handled lawfully, fairly and securely, while enabling appropriate information sharing where necessary. A balance should

be maintained between an individual's right to privacy and the need to protect and safeguard people.

7.9 We will share concerns with parents/carers at an early stage, unless this would put a child at greater risk or compromise an investigation. Parents/carers need to know what our responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals.

7.10 We will be clear about the purpose of sharing confidential information and only share as much as needed to achieve our purpose and will always record this information in the child's child protection file.

7.11 We will inform parents/carers (or the child, if they have sufficient understanding[1]) when we share their information for safeguarding reasons, if possible. However, **we do not need to seek agreement from parent/carers (or the child) if we have serious concerns about a child's safety and well-being.**

7.12 **We will not inform parents/carers (or the child) that we are sharing information if** it would place a child or adult at increased risk of harm, it would prejudice a criminal investigation, it would lead to unjustified delay in making enquiries about reports of significant harm to a child, or it's required by law or a court order to share information.

7.13 **We will not inform parents/carers (or the child) that we are sharing information** in cases where there are child protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Front Door for Families and/or individual agencies involved such as Family Help Pods or Police; and staff members will record what information has been shared.

7.14 **If we are seeking the following types of support, we will seek agreement from parents/carers**:

- Family Help investigations or assessments of concerns under section 17 of the Children Act 1989 or as part of targeted Early Help. Family Help services will assume that we have obtained meaningful agreement from the parents to share information and make a referral for support.

7.15 Where there is doubt about the need for seeking agreement to referral or information sharing, staff members will get advice from the DSL, and/or Front Door For Families.

[1] Children aged 12 or over may generally be expected to have sufficient understanding. Younger children may also have sufficient understanding. All people aged 16 and over are presumed, in law, to have the capacity to give or withhold their consent, unless there is evidence to the contrary.

7.16 We do not need to let parents/carers know we are making a referral if we consider the child is in need of protection from harm, although we will inform them if this doesn't pose a risk to the young person. Parents/carers will ultimately be made aware of which organisation made the referral. If parents/carers don't want us to make a referral but we decide to continue, we will make this clear when we make the referral.

7.17 We are aware that 'public task' is a legal basis for sharing safeguarding information. This includes sharing information to prevent harm, promote the welfare of the child, and to identify risk in order to prevent harm. We will ensure that data sharing is relevant, necessary, clearly presented, and appropriately contextualised.

7.18 We have legal obligations to share information to safeguard a child through statutory legislation, for example, the legal obligation for staff to report if they discover an incident of Female Genital Mutilation.

7.19 We are aware that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.

7.20 We will keep a record of our decision to share information, with or without parent/carer agreement, and the reasons for it.

7.21 When we make our referral, if we have not informed the child and parent/carer we will agree with Front Door for Families what the child and parents will be told, by whom and when.

8 Children's Services Framework Document: The Right Support at The Right Time

8.1 The Children's Services Framework Document has been developed so that everyone working with children in Brighton & Hove has a common language for understanding the needs and risks surrounding children and their families.

8.2 For example, if the school has concerns about a child and needs advice or support from the Front Door for Families, they will use the Framework Document as a guide to understand the school's concerns and provide advice about what to do or to decide whether the child and family need support and from which agency. The Framework Document does not replace professional

judgement, but it is intended to support decision-making and discussions between services and practitioners.

8.3 It is important that staff members are familiar with the Framework Document, which can be accessed at https://www.bhscp.org.uk/parents-carers-and-the-community/brighton-hove-family-help-right-support-at-the-right-time/.

8.4 The Framework Document shows that a child's or family's additional needs can be on a range, and that needs can within this range. It covers children whose needs are increasing as well as children whose needs are decreasing after professional involvement. The Framework Document will help practitioners to identify the right level of support for the child in the least intrusive way while keeping the child safe.

8.5 The Framework Document identifies three levels of need, level 1 (universal), level 2 (Family Help), and level 3 (Specialist services to address acute and chronic need).

8.6 By referring to the Framework Document, the school can identify when assessment and support for a child and family may be required and what the school can do to support a child and family with a range of concerns.

9 Front Door for Families

9.1 Referrals accepted by Front Door for Families will be screened by a multi-agency hub, with a social worker and their manager evaluating the concerns to identify the sources and levels of risk and to agree what protective action may be necessary. They may send the referral on for support via the Best Start Family Hubs, the Family Help Pods, and/or other local support services. The majority of this will be via agreement from parents/carers after a social worker has spoken to them. If it is deemed that a child is at risk of significant harm, then further enquiries under s47 will take place which may be without parental agreement.

9.2 We will participate in information sharing as part of this screening, to allow Front Door for Families to make an accurate assessment.

10 Best Start Family Hubs

10.1 Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from our school or other services such as the NHS. Providing help early is more effective in promoting the welfare of children than reacting later.

10.2 Best Start Family Hubs also provide a range of support such as triple P parenting courses, cost of living support, parental relationships and conflict support. More information can be found at https://www.brighton-hove.gov.uk/family-help-online/family-hubs-and-what-they-offer

11 Family Help for Children and Families, including Social Work Support

11.1 Our school will work together with other agencies to provide a coordinated offer of Family Help, in line with *Working Together to Safeguard Children (2026)* and local guidance, to any child who needs it.

11.2 We will pool our knowledge within the school and with other agencies about which families or children need additional support in a range of ways so that we can work out how best to help them. We will use the Framework Document to identify what level of need, and specific needs, the child or their family has.

11.3 We will work closely with targeted early help services, via the Front Door For Families, and Family Help, which may include social work support, if we feel families need more support and input, or children are at risk of harm, and we will continue to provide support if other services are also needed.

11.4 Family Help support can be accessed by making a referral to the Front Door For Families, this includes targeted Early Help Support, S.17 support, and S. 47 support. If S. 47 support is being sought, agreement is not required from the family, although if safe to do so, we will seek agreement (see Section 7, Information Sharing). For all other support, meaningful agreement from the family is required.

11.5 Our school will work with other services in Family Help planning and coordination of interventions to meet young peoples and families.

11.6 Sometimes Family Help support will be co-ordinated by a social worker, for example if the child is suffering, or at risk of suffering, significant harm and enquiries need to be made under section 47 of the Children Act 1989, and in some cases, where the child is in need and should be assessed under section 17 of the Children Act 1989. Sometimes Family Help support under section 17 and targeted early help will be provided by an alternatively qualified worker.

11.7 We will cooperate with Family Help and the police in any emergency action they take using their legal powers for immediate protection of the child.

11.8 We will participate in any multi-agency discussions (strategy discussions), if invited to do so, and share information about the child and their family to plan the response to concerns.

11.9 We will share information about the child and their family for section 47 enquiries and family assessments undertaken by Family Help.

11.10 We will ensure that a relevant staff member participates in all initial and review child protection conferences, if we are invited to attend. The staff member will work together with other agencies to discuss the need for and agree to an outcome-focused child protection plan and will ensure that the child's wishes and views are considered in their own right in planning.

11.11 If we are members of the core group to implement a child protection plan, we will ensure a relevant staff member participates in core group meetings.

11.12 We will ensure that we complete all actions allocated to us as part of the outcome-focused plan, whether a child protection plan or a family support plan, in a timely way.

11.13 We will continue to monitor children once their plans are ended to ensure that they are supported and kept safe.

12 Record Keeping

12.1 Good record keeping is an important part of the school's accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children.

12.2 The Designated Safeguarding Lead will be responsible for safeguarding records, see more about record keeping in paragraphs 10 of section 1 and the DSL's responsibilities with regards to record keeping in Appendix A.

13 Professional Challenge and Disagreements

13.1 Working with children and families, and in particular child protection work, is stressful and complex, as well as involving uncertainty and strong feelings. To ensure that the best decisions are made for children, we need to be able to challenge one another's practice.

13.2 We will promote a culture within our school that enables all staff members to raise, without fear of repercussions, any concerns they may have about the management of child protection in the school. This may include raising concerns about decisions, action and inaction by colleagues about individual children. If necessary, staff members will speak with the Designated Safeguarding Lead, the head teacher, the chair of governors or with the Local Authority Education Safeguarding Officer.

13.3 Cooperation across agencies is crucial; professionals need to work together, using their skills and experience, to make a robust contribution to safeguarding children and promoting their welfare within the framework of discussions, meetings, conferences and case management.

13.4 If there are any professional disagreements with practitioners from other agencies, the Designated Safeguarding Lead or the head teacher will raise concerns with the relevant agency in line with guidance in the *Sussex Safeguarding Children's Procedures Professional Differences, Resolution, and Escalation Protocol*.

13.5 If the school disagrees with the child protection conference chair's decision, the Designated Safeguarding Lead or the head teacher will consider whether they wish to challenge it further and raise the matter with Children's Services Head of Safeguarding.

Appendix C – Specific Safeguarding Concerns

1 Specific Safeguarding Issues

1.1 School staff members need to be aware of specific safeguarding issues. Staff will read and understand Part One of *Keeping Children Safe in Education 2026*, which provide essential safeguarding information, indicators of abuse and neglect, and guidance on responding to the following safeguarding concerns:

- Child abduction and community safety incidents;
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE);
- County lines;
- Children and the court system;
- Children missing from education;
- Children with family members in prison;
- Cybercrime;
- Domestic abuse;
- Homelessness;
- Modern slavery and the National Referral Mechanism (NRM);
- Preventing radicalisation;
- The Prevent Duty;
- Channel;
- Serious violence;
- Honour-based abuse (including Female Genital Mutilation and Forced Marriage);
- The mandatory reporting duty relating to Female Genital Mutilation (FGM);
- Forced marriage.

1.2 Chapter 8 of the *Sussex Child Protection and Safeguarding Procedures* has detailed information about local procedures for some specific issues. These will be referred to when relevant.

1.3 Within this Appendix, there is further local information, in addition to the information provided within Annex A of *Keeping Children Safe in Education 2026* and within the Sussex Safeguarding Children Procedures, topics include:

- Children Missing from Education

- CSE, CCE, and County Lines
- Domestic Abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Mental Health
- Neglect
- Online Safety
- Private Fostering
- Self-Harm, Suicidal Behaviour, and Suicide

1.4 Child-on-Child abuse is addressed with *Part 5 of Keeping Children Safe in Education (2026)* and in Appendix D of this policy.

1.5 Prevent and radicalisation are addressed in Appendix E of this policy.

2 Children Missing from Education

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

2.2 Attendance under 90% is considered 'persistent absence' and attendance under 50% is considered 'severe absence'.

2.3 In-school attendance procedures are defined within the Attendance Policy. Staff will speak to the DSL if they have concerns about a child's attendance.

2.4 The guidance *Working Together to Improve Attendance (2026)* is followed to work with the local authority to support where an attendance concern is present and may be related to safeguarding. Therefore, where a child's attendance drops below 30%, we will consider referral to the local Multi-Agency Attendance Panel for advice and guidance.

3 CSE, CCE, and County Lines

3.1 Exploitation involves situations, contexts, and relationships where a person or persons receive ‘something’ (for example food, accommodation, drugs, alcohol, cigarettes, gifts, money, affection) because of them completing a task on behalf of another individual or groups of individuals. Exploitation involves grooming and coercion and so often occurs without the child’s knowledge/understanding and they may believe they are in control of the situation.

3.2 Child Sexual Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

3.3 Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.

3.4 County lines is a term used to describe organised crime groups (OCGs) involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines. They are likely to exploit children and young people to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. This may not always involve crossing a county border, e.g. could exist from one part of Sussex to another, or from one part of a town or city to another. County Lines is one form of criminal exploitation, and not all drug related exploitation is County Lines.

3.5 Staff are aware that children involved in any form of exploitation are victims of abuse.

3.6 Staff are aware of adultification bias, where children from diverse or minoritized communities are treated as more mature than they are by a reasonable social standard of development. We will be aware of this when considering possible exploitation.

3.7 Staff will be aware of CCE, CSE, and County Lines from reading Part One of *Keeping Children Safe in Education (2026)* and from relevant training within school. They will be aware of signs and indicators from these resources and where these are noted will follow the Child Protection Procedures set out in this policy.

3.8 If a child is identified as at risk of exploitation, they will be referred to Front Door for Families, and may access Family Help, including social worker support, who can take steps to support such as, referral into the National Referral Mechanism and/or referral into the local AVRM (Adolescent Vulnerability Risk Meeting).

3.9 The DSL is aware of the National Referral Mechanism, the UK's framework for identifying and supporting victims of exploitation and modern slavery.

4 Domestic Abuse

4.1 See *Keeping Children Safe in Education (2026) page 161-164*.

4.2 Our school is part of Operation Encompass, co-ordinated by Sussex Police.

4.3 Operation Encompass is a national police and education early intervention safeguarding partnership which supports children who experience Domestic Abuse. Operation Encompass is in place in every police force in England and Wales, the Isle of Man, Jersey, Guernsey, Scotland, Northern Ireland and Gibraltar.

4.4 Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act. There is a legislative requirement for police forces to share information with educational settings through Operation Encompass.

4.5 Through Operation Encompass the police will share information with our school about police attended domestic abuse incidents which involve any of our children who are related to any of the adults involved in the incident. This sharing of information will occur prior to the start of the next school day, as far as possible. The notification will inform us about the context of the incident and will include the Voice of the Child.

4.6 The DSL has been trained to receive Operation Encompass notifications, as have our deputies, and these help us to support children who may have been the victims of domestic abuse.

5 Female Genital Mutilation (FGM)

5.1 FGM is a form of child abuse and violence against women and girls, sometimes referred to as a form of so-called 'honour or faith-based abuse'. It is illegal in the UK and is a safeguarding concern regardless of whether it takes place in the UK or abroad.

5.2 Staff understand and will comply with their mandatory duty to report FGM: Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Staff will not be examining pupils or students.

5.3 The duty applies when staff are informed by a girl under 18 that an act of FGM has been carried out on her; or when staff observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

5.4 For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

5.5 Staff can find procedural information about the mandatory reporting duty here: https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

5.6 Staff are aware of signs that a girl could be at risk of FGM:

- a relative or someone known as a 'cutter' is visiting from abroad;
- a special occasion or ceremony takes place where a 'girl becomes a woman' or is 'prepared for marriage';
- a female relative, like a mother, sister, or aunt has undergone FGM;
- a family arranges a long holiday overseas or visits a family abroad during the summer holidays or are evasive about why/where/who the girl is going on holiday with and/or taken abroad whilst brothers remain in the UK;
- a girl has an unexpected or long absence from school and/or is secretive about an upcoming holiday;
- a girl struggles to keep up in school;
- a girl runs away, or plans to run away, from home.

5.7 Staff are aware of signs that FGM might have taken place:

- having difficulty walking, standing, or sitting;

- spending longer in the bathroom or toilet;
- urinary tract infections;
- appearing quiet, anxious, or depressed;
- acting differently after an absence from school or college;
- reluctance to go to the doctors or have routine medical examinations;
- asking for help – although they may not be explicit about the problem because they're scared or embarrassed.

5.8 Staff are aware that the presence of one or more warning signs does not necessarily indicate a risk of FGM. However, staff will remain professionally curious and seek advice from the DSL where concerns arise.

5.9 Where there are concerns that a child may be at risk of FGM, the DSL will follow the Child Protection Procedures set out in this policy and may use the National FGM Centre Referral Guide (https://nationalfgmcentre.org.uk/wp-content/uploads/2018/05/Referral-Guide-.pdf) to support decision-making and discussions with parents/carers where it is safe and appropriate to do so. This is distinct from situations where a teacher has discovered that FGM has already taken place, in which case the teacher must make a personal report to the police in accordance with their statutory duty.

5.10 In the UK, the Home Office have identified girls and women from certain communities as being more at risk, this information can be found on the NSPCC website (https://www.nspcc.org.uk/keeping-children-safe/types-of-abuse/female-genital-mutilation-fgm/#risk). The National FGM Centre's World FGM Map can also be used to find the prevalence in countries across the world (https://nationalfgmcentre.org.uk/world-fgm-prevalence-map/). The DSL will be aware of but not use this list to make assumptions based on a child's ethnicity, culture, religion, or national origin.

5.11 The DSL, school staff, and parents/carers can find additional information and resources related to FGM on the Brighton & Hove Safeguarding Children's Partnership website, via this link: https://www.bhscp.org.uk/parents-carers-and-the-community/types-of-abuse-and-how-to-spot-the-signs/female-genital-mutilation-fgm/?highlight=female%20genital%20mutilation

6 Forced Marriage

6.1 Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one of both parties and where violence, threats or any other form of coercion is used.

6.2 Staff are aware that it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. In cases where staff suspect marriage is planned before the age of 18, they will follow the Child Protection Procedures set out in this policy.

6.3 6.1 and 6.2 apply to non-binding, unofficial 'marriages' as well as legal marriages.

6.4 As part of response to forced marriage concerns, the DSL, or a member of the safeguarding team, may contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

7 Mental Health

7.1 Staff are aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where staff become aware of mental health problems, they will follow the Child Protection Procedures set out in this policy.

7.2 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff, however, still have an important role to play. Specifically, we support the fulfilment of 4 key roles:

• promoting good mental wellbeing and preventing the onset of mental illness,

• observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,

• ensuring early targeted support is provided, and

• liaison with/referral to specialist services where needed.

7.3 Staff are aware of indicators and signs of distress which may include:

- significant changes in behaviour, including acting out, being boisterous and increased aggression as well as withdrawal and people pleasing;
- persistent difficulty sleeping;
- withdrawal from social situations;
- loss of interest in activities previously enjoyed;
- signs of self-harm or self-neglect;
- expressions of hopelessness or suicidal thoughts.

7.4 Where support is needed, the designated safeguarding lead (or a deputy) will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

7.5 See the section on 'Self-harm, suicidal-behaviour, and suicide' for further information on these situations.

7.6 We may make referrals to relevant mental health services where appropriate, such as the Schools Mental Health Service, the Brighton & Hove Wellbeing Service, and/or CAMHS. These referrals will be co-ordinated by the DSL, or the Mental Health Lead, who may seek advice from the relevant service prior to referral to establish whether the child's needs meets the threshold for support. This may include speaking directly with our named Mental Health Practitioner, to talk about the situation informally and anonymously to decide the most appropriate next steps.

8 Neglect

8.1 The definition of neglect is included in Appendix B of this policy. Where staff become aware of signs of neglect, they will follow the Child Protection Procedures set out in this policy.

8.2 Neglect is the most common form of child abuse and has four broad types:

- Physical neglect: where a child's basic needs (e.g. food, shelter, clothing) are not met or the child isn't kept safe
- Emotional neglect: involves a parent or carer failing to provide the nurture and stimulation they require
- Educational neglect: when a parent or carer doesn't ensure that a child is properly educated
- Medical neglect: involves a child not being given proper health care and dental care

8.3 Staff will be aware of signs of neglect, including:

- Being frequently absent from school
- Inappropriate clothing (e.g. shoes too small, clothes are ill-fitted or unsuitable for the weather conditions)
- Clothes are consistently dirty or smelly
- Being hungry
- Hands are cold, red and swollen
- Unkempt appearance and poor hygiene; hair quality is poor or is messy, teeth are dirty, skin dirty
- Lacking necessary medical or dental care, including immunisations or glasses

- Missing medical appointments
- Health problems, including anaemia, body issues, poor muscle tone or prominent joints, regular illness of infections, repeated accidental injuries (often cause by lack of supervision), skin issues (e.g. sores, rashes, flea bites, scabies, ringworm), thin or swollen tummy, weight or growth issues, untreated injuries
- Developmental problems, including poor language or social skills
- Frequent and untreated nappy rash in infants
- Being constantly underweight or considerably losing weight
- The parent or carer has failed to keep the child protected from physical harm or danger
- Begging or stealing things like money or food
- Living in an unsuitable environment (e.g. no heating, messy)
- Being left home alone for long periods of time
- Taking on the role of a carer for other family members
- Changes in behaviour, such as becoming clingy, aggressive, withdrawn, depressed or anxious, displaying obsessive behaviour
- Changes in eating habits
- Using drugs or alcohol
- Self-harm or attempts at suicide

8.4 In order to be vigilant around signs of neglect and ensure that neglect isn't causing harm to children, we may use the Graded Care Profile 2 (GCP2) to support us in measuring care of children by their carer/parent. This will allow us to provide guidance and/or interventions, or signpost or refer on to the most appropriate support for families.

8.5 Where we have noticed signs of neglect, we may refer into the Brighton & Hove Neglect Forum, a multi-agency forum where practitioners can gain advice and guidance. For more information on the Neglect Forum, see the Brighton & Hove Safeguarding Children's Partnership's website (https://www.bhscp.org.uk/people-working-with-children/brighton-hoves-neglect-forum/).

9 Online Safety

9.1 We will ensure that parents and carers are aware of what their children are being asked to do online, including the websites, platforms and applications they may be required to access, and we will be clear about who from the school (if anyone) children may interact with online. Governing bodies and

proprietors will provide children/young people with a safe environment in which to learn and will do all that they reasonably can to limit children's exposure to risks from the school's or college's IT system. This includes protecting pupils from harmful content, inappropriate online contact, cyberbullying, commerce risks, online exploitation, misinformation, disinformation and emerging online risks, including those associated with artificial intelligence (AI).

9.2 We recognise the importance of teaching children about online safety risks and embed this within our PSHE curriculum.

9.3 Where online learning or remote engagement takes place, we will ensure appropriate safeguards are in place to protect children and staff.

9.4 We recognise the impact of cyberbullying and other harmful online contact and will address any online behaviour concerns as per our Behaviour Policy, and the following section on Child-on-Child harm, where appropriate. Any online safety concern that places a child at risk of harm will be managed in accordance with the Child Protection Procedures set out within this policy.

9.5 Staff are aware that generative AI may be used to create, manipulate or distribute harmful, abusive, sexualised or misleading content involving children. Such incidents will be treated as safeguarding concerns and managed through this policy.

9.6 Where there are concerns about online content involving children, we will take steps to report and remove content via the Internet Watch Foundation (https://www.iwf.org.uk/en/uk-report/) and/or Report Harmful Content (https://reportharmfulcontent.com) and may report incidents to the police and other relevant agencies as required (see Child Protection Procedures section of this policy). We will also share these websites with parents/carers so that they can report/remove content themselves.

9.7 **Filtering and Monitoring**

9.8 The governing body, leadership team, and DSL, are responsible for limiting children's exposure to the above risks from the school's or college's IT system. The governing body and leadership team consider those who are potentially at greater risk of harm and how often they access the IT system. The DSL will take lead responsibility for online safety as part of their wider safeguarding responsibilities and will work closely with the SLT lead for filtering and monitoring and relevant IT staff.

9.9 We:

• designate a named member of the Senior Leadership Team (SLT) to take strategic responsibility for filtering and monitoring: [insert name of SLT lead]

• ensure the effectiveness of filtering and monitoring systems is reviewed at least once every academic year by the SLT lead responsible for filtering and monitoring, with support from the DSL and IT support.

• consider relevant and emerging risks, such as Prevent/radicalisation and risks relevant to AI technologies.

• block harmful, illegal, and inappropriate content without unreasonably impacting teaching and learning.

• have effective monitoring strategies in place that meet our safeguarding needs.

• meet the Department for Education Digital and Technology Standards for schools and colleges.

10 Private Fostering

10.1 Private fostering (defined by the Children Act 1989) occurs when a child under the age of 16 (under 18 for children with a disability) 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. The arrangement must last, or be intended to last, for 28 days or more.

10.2 For the purpose of private fostering, a parent or person with parental responsibility is defined in the Children Act 1989 as a birth parent, adoptive parent, or person with the rights, duties, powers, responsibilities, and authority which by law a parent has in relation to a child (e.g. acquired through law or court order, such as Child Arrangement Order or Special Guardianship Order). A relative in their own home would include a grandparent, brother, sister, uncle or aunt (whether by full blood, half blood, marriage or civil partnership), or step-parent. A relative would not include great-aunts and great-uncles, cousins, family friends, or neighbours.

10.3 Private fostering arrangements must be reported to the Local Authority at least 6 weeks prior to the arrangement starting, or immediately if the arrangement will begin within 6 weeks. Sometimes this doesn’t happen as those involved are unaware of this legal requirement.

10.4 This lack of awareness means that many privately fostered children remain hidden and can be vulnerable.

10.5 If the school become aware of a planned private fostering arrangement, we will advise the parent/carer of their legal obligations to report this arrangement to the Local Authority. If the school is not satisfied that this has happened or become aware of an arrangement that may not have been reported to the Local Authority, the school will report the arrangement to the Local Authority via Front Door for Families.

10.6 Our school will consider whether home stay arrangements within the UK amount to “private fostering” and therefore require notification to the Local Authority.

11 Self-harm, suicidal behaviour, and suicide

11.1 The Mental Health Foundation define self-harm as “behaviours that lead to bodily harm as a result of overwhelming feelings or difficult emotions”. This can take many forms.

11.2 Where staff members have concerns about self-harm, suicidal behaviour, and suicide, they will follow the Child Protection Procedures set out within this policy.

11.3 Staff are aware of indicators and signs of distress, including those outlined in the Sussex Safeguarding Children’s Procedures, Chapter 8.4.1. Staff are aware that self-harm and suicidal ideation may be safeguarding concerns in their own right and/or indicative of other abuse or harm may be occurring.

11.4 When a child who has self-harmed presents to a member of staff, the staff member will (in collaboration with a member of the safeguarding team)

- treat the child with respect, dignity and compassion, with an awareness of cultural sensitivity;
- work collaboratively with the child to ensure that their views are taken into account when making decisions;
- address any immediate physical health needs resulting from the self-harm, in line with our First Aid policy, if necessary calling 111, 999, or other external medical support (The Sussex Mental Health line can be contacted via 111 and selecting the mental health option);
- seek advice from a healthcare professional or social care practitioners, which may include referral to a healthcare or mental health service, or advising a parent/carer to take the child to their GP or A&E;
- ensure that the child is aware of sources of support such as the Sussex Mental Health Line (111; mental health option), Samaritans (116 123); Sussex messaging support (text SUSSEX to 85258); Childline; and PAPYRUS HopeLine (0300 102 2470; TEXT HOPE to 88247; EMAIL pat@papyrus-uk.org).
- treat the incident as a safeguarding concern and follow the Child Protection Procedures outlined in this policy.
- ensure a safety plan is in place going forward from this event, or review any safety plans already in place.

11.5 Parents/carers will be informed and involved in planning support for the child, as early as possible, as long as it is safe to do so. Decisions made by the DSL about parental involvement will be in the best interests of the child and will take account of safeguarding risks, welfare of the child, the views of the child, and advice from relevant professionals (e.g. CAMHS Duty – 0300 304 0061, emergency services – 999, Front Door for Families, Sussex Mental Health Line – 111, and others).

11.6 When staff become aware of self-harm and in collaboration with the safeguarding team, they will try to ascertain:

- the severity of the injury and how urgently medical treatment is needed (in line with our First Aid policy);
- the child's emotional and mental state, and level of distress;
- whether there is immediate concern about the child's safety;
- whether there are any safeguarding concerns;
- a recognition of protective factors and the network around the child;
- whether the child has mental health care and a safety plan.

11.7 Where suicidal ideation, suicidal behaviour or suicide risk is identified, staff will follow the Child Protection Procedures outlined in this policy. We will ask children directly, age-appropriately, and sensitively, whether they are thinking about ending their life and whether they have made any plans to do so. We recognise that suicide-prevention and healthcare organisations encourage direct questioning as evidence indicates that this does not increase risk and may help people to feel understood and supported, as well as enabling a more accurate assessment of risk.

Appendix D – Child-on-Child Harm

1 Children can abuse other children, inside and outside of school. All staff play an important role in preventing this and responding where they believe children may be at risk from it. When staff have concerns about children abusing other children, they will follow the Child Protection Procedures set out in this policy.

2 Staff will challenge inappropriate behaviours between children that are abusive in nature and will be aware that these are a safeguarding concern for both the child who has been harmed and the child who has caused harm. They will also be managed via the schools positive relationships and behaviour management policy and anti-bullying policy when appropriate.

3 Child-on-child harm is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'),
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),
- serious physical assault and harm, or the threat of harm with a weapon,
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence),
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- consensual and non-consensual making or sharing of nudes and semi-nudes,
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

3.2 When staff receive reports of child-on-child harm, they will respond in the same way as to other disclosures, as described in our Child Protection Procedures set out in this policy.

3.3 When it is necessary to report instances of child-on-child abuse to the police, we will explain to children involved and their families that the law is in place to protect children rather than to necessarily criminalise them and will try to avoid distressing or alarming them.

3.4 We will take account of the wishes of the child who has been harmed when managing an allegation of harm from another child, when deciding how to proceed. However, this will need to be balanced with the school's duty and responsibilities to protect other children.

4 Harmful sexual behaviour (HSB), sexual harassment and sexual violence

4.1 Where we have concerns about HSB, sexual harassment and sexual violence, our response will be guided by Part 5 of *Keeping Children Safe in Education 2026*, which holds more detail that this policy, and we may reach out to partner agencies for advice, including Front Door for Families, the local authority Education Safeguarding Officer, and/or the police.

4.2 Children's sexual behaviour exists on a continuum and will always be considered in context, using continuum tools such as Hackett's continuum (found on the NSPCC website) and considering the ages and developmental stages of children. Where behaviour is judged to be 'harmful' we will always take a safeguarding approach.

4.3 Sexual harassment refers to 'unwanted conduct of a sexual nature' and sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 (see *Keeping Children Safe in Education 2026* paragraph 540).

4.4 We take a zero-tolerance approach to sexual harassment and sexual violence, and such concerns will be addressed using the Child Protection Procedures set out in this policy, including consideration of reporting to the police. In such cases, the DSL will have regard to the guidance set out in *Keeping Children Safe in Education 2026*, paragraphs 593-603.

4.5 We are aware that children who are victims of HSB, sexual harassment or sexual violence may find the experience stressful and distressing and will be exacerbated if the alleged child who caused harm attends the same school or college. We will reassure all victims that they are taken seriously and will be supported and kept safe.

4.6 We take a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, including digitally altered or AI-generated images.

4.7 Upskirting is a criminal offence. Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing

their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

4.8 Where there are reports of HSB, sexual harassment and sexual violence, we may: manage internally, manage internally whilst seeking additional support from Universal services and/or community based Early Help assessment, refer to Family Help, or reporting to the police. When making decisions about how to manage reports and actions to take, we will always consider the needs of and support for both the child who has been harmed and the child who has harmed.

5 Risk Assessment

5.1 It may be necessary to put in place risk assessments to support all children involved in an incident of child-on-child abuse. This will always consider potential intra-familial harms and risk to siblings. These will be completed in collaboration with the children and their families, although details of other children involved will not be able to be shared. We will also collaborate with other involved agencies (such as police or Family Help services) when creating risk assessments, where appropriate.

5.2 Where there is a report of child-on-child sexual violence, the DSL, or a deputy, will carry out a risk and needs assessment which considers:

- the child who has suffered harm's safety and support needs
- potential other children who may have suffered harm
- the child(ren) who has (have) harmed
- the wider school or college community, including staff and students, and any actions that are appropriate to protect them from the alleged child who has caused harm, or from future harms,
- the location and time of the incident, with steps to improve safety in that area.

5.3 Risk assessments will be shared with staff within the school, as necessary, to ensure that staff are aware of the measures in place to safeguard those children.

5.4 Risk assessments may be required for the location where the harm took place.

5.5 Risk assessments will be reviewed and used to inform ongoing safeguarding decisions.

6 Whole School Approach

6.1 In order to minimise risk of child-on-child harm, we have an active RSHE curriculum which promotes a zero-tolerance approach to harming one

another. Our curriculum helps to create an environment where all children feel safe, supported, and respectful of their peers.

6.2 We also:

- challenge behaviours, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- recognise the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence,
- address any inappropriate behaviour (even if it appears to be relatively innocuous) is an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future
- challenge any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images and sexist or misogynistic language
- be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys, whilst at the same time recognising that any of these issues can affect any pupils regardless of their gender
- ensure our whole school approach to safeguarding and preventive curriculum helps to educate pupils about appropriate behaviour and consent
- ensure pupils are aware of the different ways in which they can speak with a trusted adult in the school, either directly or through other means such as worry boxes or online help buttons, which are monitored by key staff in the safeguarding team. (Amend this sentence to reflect what the systems in your school are.)
- ensure pupils are aware of the different ways in which they can speak with an adult outside of the school through agencies such as Child Line or the NSPCC
- ensure that staff are aware of child-on-child abuse and maintain an attitude of 'it could happen here', as they do with all areas of safeguarding
- ensure that staff are trained to understand that a child harming another child could be a sign that the child is being abused themselves.

6.3 Our policies are consistently under review with respect to child-on-child harm.

6.4 We monitor patterns in child-on-child harm through data review and use this to take a proactive and preventative stance with regards to child-on-child harm. This includes informing risk assessment, whole-school actions, the RSHE curriculum, and CPD. Such data and resulting actions will be shared

with the governing body for oversight. We wil also share emerging trends with safeguarding partners.

Appendix E – Prevent: Extremism and Radicalisation

1 The Prevent Duty

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

1.2 The aim of Prevent is to stop people from becoming terrorists or supporting terrorism, by tackling the ideological concerns of terrorism and intervening early to support those susceptible to radicalisation. Prevent also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.

1.3 The CTSA 2015 has also placed Channel as a statutory duty (section 36 to section 38 of the CTSA). Channel is the multi-agency framework to identify, refer, assess, and support individuals susceptible to being drawn into terrorist-related activities or supporting terrorism. The Local Authority leads on Channel and all schools and colleges have a 'Duty to Co-operate' with Channel as far as compatible with their legal responsibilities in respect of their functions.

2 Definitions:

2.1 Radicalisation: the process of a person legitimising support for, or use of, terrorist violence.

2.2 Terrorism: an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

2.3 Extremism: is defined as the promotion or advancement of an ideology based on violence, hatred, or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or,
- undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2).

2.4 The definition also sets out the types of behaviour that are indicative of the kind of promotion or advancement which may be relevant to the definition.

2.5 Prevent Guidance remains unchanged and Prevent continues to be involved in extremism which can be reasonably linked to terrorism, such as where it might lead to radicalisation into participating in or supporting terrorism.

3 What We Do

3.1 The governing body/proprietor, alongside the DSL and Prevent lead, are responsible for ensuring the school complies with the Prevent Duty. The Prevent Duty is included in the Governor's Essential Safeguarding Training and the governing body has oversight of our Prevent Risk Assessment.

3.2 In order to comply with the Prevent Duty, our school

- ensures staff understand the terms 'radicalisation', 'extremism', and 'terrorism', the risk of radicalisation that results in support for terrorism or involvement in terrorism, and signs of and susceptibility to radicalisation, (all staff complete the Prevent Awareness training through the National College with safeguarding staff additionally taking the 'Referrals' course and the DSL takes the 'Channel or Prevent Multi-Agency Panel (PMAP)' course every 2 years, and holds records of which staff have completed which training;
- deals with radicalisation concerns within our Child Protection Procedures set out in this policy offering a formal pathway to escalate concerns, with the DSL responsible for considering referral to Prevent or other appropriate safeguarding services where necessary, and keeping records of referrals within the child's child protection file;
- promotes the importance of Prevent and the role staff can play in reducing the risk of susceptible individuals being drawn into terrorism or supporting terrorism, through internal communications and staff training;
- works with partners, including local Prevent leads (see contacts Section 6 below) and the Channel process, when applicable;
- holds a whole-school Prevent risk assessment, which is updated annually by the DSL and Prevent Lead and overseen by the governing body, and uses this to inform other areas of practice, such as filtering and monitoring arrangements;
- considers radicalisation, terrorism, and extremism as part of our filtering and monitoring practices to limit potential online harmful influence and within our IT policy;
- reduces permissive environments and builds resilience through a broad and balanced curriculum, including RSHE, critical thinking, online safety education, and promotion of fundamental British values;
- ensures that any visiting speakers, whether invited by staff or by children themselves, are suitable and appropriately supervised. Speakers may not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs, whilst remaining mindful of political impartiality. They may not promote extremism, as defined in 2.3.

3.3 We will not tolerate behaviour, language, materials or activities that promote, encourage or legitimise terrorism, extremist ideologies, hatred or violence. Any prejudice, discrimination, or extremist views, including derogatory language, displayed by pupils or staff will always be challenged and, where appropriate, dealt with in line with our Positive Relationships & Behaviour management Policy and Staff Code of Conduct.

3.4 We will promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We will teach children to respect one another and to respect and tolerate differences.

4 Prevent Risk Assessment:

4.1 In line with the DfE guidance on Understanding and identifying radicalisation risk in your education setting (2023), our Prevent Risk Assessment considers:

- local and national risks, including promoting staff awareness of these
- risk of children being drawn into terrorism
- staff awareness and training arrangements, including whole-staff training and DSL/safeguarding team training
- IT systems and filtering and monitoring
- building children's resilience through curriculum content and delivery
- working in partnership

5 Signs of Concern and Vulnerability to Radicalisation

5.1 There is no single way of identifying whether a child may be susceptible to radicalisation into terrorism or supporting terrorism. We will promote staff awareness of the following indicators from the Department for Education's Guidance: *Managing risk of radicalisation in your education setting (September 2023)*, so that they can appropriately explore concerns and contact the DSL/follow our Child Protection Procedures for Prevent safeguarding concerns.

5.2 Increasingly, extremist and terrorist groups use social media (for example, apps, forums, blogs, chat rooms) to identify, target, and influence susceptible individuals. This online influence may include online gaming and gaming adjacent platforms. Learners may be at risk of accessing inappropriate and harmful extremist content online. There is a rapid proliferation of terrorist content online and the internet has become the preferred avenue for those searching for terrorist propaganda.

5.3 The DSL will use the Department for Education's Guidance: *Managing risk of radicalisation in your education setting (September 2023)*, to decide on next steps, which may include multi-agency working or a Prevent referral.

Risk Level	Indicators
Low Risk (when seen alone would not necessarily need to be	• holding strong opinions or values (non-violent or non-extremist) • criticising government policies • adopting visible signs, for example wearing clothing (non-violent or non-extremist), to express identity or sense of belonging • being active on social media

explored further)	• taking a keen interest in national and international affairs • demonstrating support and supporting causes, for example animal rights (non-violent) • showing new interest in a political ideology or religion • holding or expressing conservative values or practices, whether traditional, cultural or religious (unless they cause harm to a child or others, for example female genital mutilation)
At Risk (behaviours that could increase their risk and vulnerability to radicalisation)	• being drawn to conspiracy theories • beginning to isolate themselves from family and friends • viewing or engaging with inappropriate online content and having uncontrolled or unsupervised access to the internet • expressing concerns about being victimised, for example feeling under attack • discriminating against other individuals or groups of people • a sudden change in behaviour • showing interest in extremists or extreme groups • expressing views that divide us, for example talking about 'us' and 'them'
Medium Risk (learner is at heightened risk of radicalisation)	• legitimising the use of violence to defend ideology or cause • accessing extremist or terrorist websites, forums and publications • expressing dehumanising views • expressing an interest to travel to a conflict zone • being in contact with a group or individuals known to support a violent extremist ideology, either online or in real life • expressing persistent intolerance towards groups of people perceived as 'other' - this may be based on protected characteristics such as gender, religion or ethnicity, but not exclusively • demonstrating a fixation with weaponry or explosives (this may include posing in concerning photographs or videos with weaponry), without an otherwise reasonable explanation • being obsessed with massacre, or extreme or mass violence, without targeting a particular group (for example, high school shootings)
High Risk (behaviours indicate they	• verbally or physically attacking someone due to their race, religion, sexuality and so on

are currently exposed to terrorist or extremist activity and there's a significant risk to their safety)	• committing violent acts guided by a violent extremist ideology or group • taking part in any proscribed violent extremist group (financing, sharing material online, recruiting others and so on) • having a 'kill list' or detailed plan to carry out mass violence • producing or sharing terrorist material offline or online • recruiting others to a proscribed terrorist group or organisation

6 Contacts, multi-agency arrangements, and Channel:

6.1 We will work with local partners to fulfil our Prevent Duty, including:

- Local Authority Family Help services (including social work support) (through Front Door For Families)
- Brighton & Hove Safeguarding Children's Partnership
- Brighton & Hove's Prevent Lead Officer (channel.prevent@brighton-hove.gov.uk, Telephone 01273 291154)
- Counter Terrorism Police South-East – Prevent Team (SussexPrevent@ThamesValley.police.uk)
- Brighton & Hove Channel Panel (Channel.Prevent@brighton-hove.gov.uk, Telephone 01273 291154)

6.2 There are a range of outcomes the DSL may decide on when there are indicators that a child may be susceptible to radicalisation into terrorism. This might include school-based intervention include the use of resources from Educate Against Hate, referring to external support such as Family Help Services (including social work support), requesting support from local Police Community Support Officers or Neighbourhood Youth Officers, making a referral to Prevent, or making a referral to police.

6.3 Where a decision is made to refer into Panel, the DSL will complete the National Prevent Referral Form and email the completed form to preventreferralbandh@thamesvalley.police.uk.

6.4 This form will go to the South East Counter Terrorism Policy Prevent Team and to Front Door For Families.

6.5 Channel uses a multi-agency approach to identify people at risk, assess the nature and extent of that risk, and develop the most appropriate support plan for the person involved. These monthly multi-agency meetings are chaired by the Local Authority.

7 Resources and Further Information

7.1 Information on the Brighton & Hove City Council website: Prevent – preventing terrorism

7.2 Support from NSPCC

- Parents and adults who are concerned about their children being radicalised and the impact of terrorism can phone the NSPCC on 08088 005 000
- visit the protecting children from radicalisation page on the NSPCC website

7.3 Support from Action Counters Terrorism (ACT)

- Phone the ACT Early Support Line on 08000 113 764, in confidence, to share your concerns with specially trained police officers. The ACT Early Support Line is open from 9am to 5pm every day.

7.4 Visit the ACT Early website to see signs of radicalisation, and hear real stories of people affected by radicalisation and the support offered, signs and behaviours that may warn you about possible radicalisation, how to speak to individuals about radicalisation.

7.5 **What You Share Leaves A Trace:** The campaign provides clear guidance on what constitutes terrorist content, the risks of sharing it, and how young people, parents and professionals can report concerns.

7.6 **You Won't Know Until You Ask:** This campaign is to help parents have open conversations with children about harmful online content, including misogynistic material, body-shaming and rage-bait. The campaign provides practical tools and prompts to support parents to talk about what children are seeing online, strengthen critical thinking, and challenge misinformation. https://kidsonlinesafety.campaign.gov.uk/

Appendix F - Safer Recruitment

1 Safer Recruitment

1.1 Our school has robust recruitment and vetting procedures to help prevent unsuitable people from working with children, which are in line with those stipulated within *Keeping Children Safe in Education, 2026.* We will refer to this guidance when we carry out recruitment.

1.2 Our job advertisements and application packs make explicit reference to the school's commitment to safeguarding children, including compliance with disclosure and barring regulations and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.

1.3 Application forms will include a statement that providing false information or applying for the role if the applicant is barred from engaging in regulated activity relevant to children is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and possible referral to the police and other professional regulatory bodies.

1.4 CVs alone will not be accepted as job applications and a standard application form will be used. Gaps or discrepancies in employment on the form must be explained by candidates.

1.5 At least one member on every interview panel will have completed safer recruitment training. At least two people will carry out shortlisting, and they will consider any inconsistencies, gaps in employment and reasons given for them, and explore all potential concerns.

1.6 We will consider carrying out an online search as part of due diligence on shortlisted candidates and will inform them of this.

1.7 References will be requested prior to interview wherever possible, so that concerns raised can be explored during interview. In the case that candidates have indicated on their application forms that they do not wish their current employer to be contacted, the reference will be taken up immediately after interview and prior to any offer of employment being made.

1.8 References will ask about:

- the referee's relationship with the candidate
- whether the referee is completely satisfied that the candidate is suitable to work with children and, if not, for specific details of the concerns and the reasons why the referee believes that the person might be unsuitable.
- the applicant's current post and salary.
- performance history and conduct including details on any situation where any formal action has been taken using capability procedures within the last 2 years.
- any disciplinary procedures in which the sanction is current.
- any disciplinary procedures involving issues related to the safety and welfare of children, including any in which the sanction has expired and the outcome of those.

- details of any substantiated allegations or concerns that have been raised that meet the harm threshold and relate to the safety and welfare of children or behaviour towards children and the outcome of these concerns. *NB cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references

1.9 References will be considered satisfactory when they meet the requirements set out in *Keeping Children Safe in Education 2026*, paragraphs 300-302. In the case that such references cannot be provided, it will be the Headteacher's responsibility, on behalf of the governing body, to assess the circumstances and resolve the situation satisfactorily, keeping a written record of decision-making.

1.10 Shortlisted applicants will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children (see page 73 of *Keeping Children Safe in Education, 2026*). This information will be confidential to the chair of the selection panel / Headteacher, who will review this prior to the interview. The chair of the panel / Headteacher will discuss relevant, positive declarations confidentially with the applicant either prior to or on the interview day. The disclosure of convictions, cautions or pending cases will not necessarily prevent employment but will be considered in the same way as positive DBS disclosures.

1.11 All information considered in decision making will be clearly recorded along with decisions made.

1.12 All staff members, including volunteers, who have contact with children, young people and families will have appropriate pre-employment checks in line with *Keeping Children Safe in Education, 2026,* which may include, dependent on role:

-
- verification of the candidate's identity, using the guidelines on the Government's website about identity proofing and verification of an individual
- satisfactory DBS clearance (enhanced DBS check, with children's barred list for all engaging in regulated activity); original certificate will be viewed in person
- verification of the candidate's mental and physical fitness to carry out their work responsibilities
- verification of right to work in the UK
- further checks the school considers appropriate, if the person has lived or worked outside of the UK
- verification of qualifications, as appropriate, including of qualified teacher status, and completion of teacher induction or probation
- confirmation that those employed to carry out teaching work are not subject to a prohibition order issued by the Secretary of State for prohibition or any sanction

or restriction imposed (that remains current) by the GTCE, before its abolition in March 2012

- PRIMARY - confirmation (where relevant) that the individual is not disqualified from working with children under the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2018

1.13 All offers of employment are conditional on the satisfactory completion of pre-employment checks.

1.14 School governors are required to have both an enhanced DBS check and a section 128 check. This does not apply to associate members appointed to serve on governing body committees.

1.15 Interview notes for all short-listed applicants will be retained for 6 months before shredding. Applicants who wish to access notes from the recruitment process must make a subject access request in writing to the chair of the panel or Headteacher within 6 months of the interview date.

1.16 The school will retain the following information which will make up part of the personnel file for the successful candidate:

- application form
- references
- proof of identification
- proof of professional qualifications, as appropriate
- evidence that the Employer Access online checks have been made – teaching qualification, successful completion of induction year and no prohibition orders in place
- evidence of medical clearance from occupational health (where applicable)
- evidence of the DBS clearance (the notification form, DBS certificate reference number, and not retaining the actual certificate)
- certificate of Good Conduct or risk assessment and additional reference (where applicable)

1.17 In line with DfE requirements, the school will keep and maintain a single central record of recruitment and vetting checks. The central list will record all staff who are employed at the school, including casual staff, supply agency staff whether employed directly or through an agency, volunteers, governors who also work as volunteers, teacher trainees of salaried routes, all members of the proprietor body, and those who provide additional teaching or instruction for pupils but who are not staff members such as specialist sports coach or artists.

1.18 The Single Central Record will indicate which checks have been completed, including who undertook the check and the date on which the check was completed, or the relevant certificate was received, including:

- identity checks
- a standalone children's barred list check
- an enhanced DBS check (with children's barred list check) requested/certificate provided
- prohibition from teaching check
- further overseas records where appropriate
- qualification checks for any qualifications legally required for the job
- checks of right to work in the United Kingdom
- checks on Disqualification rules under the 2006 Childcare Act and the Childcare (Disqualification) Regulations 2018, where appropriate
- Independent/Academies/Free schools only: section 128 checks for those in positions of management
- section 128 checks for governors
- the SCR may also record additional information the school chooses to maintain for qualify assurance purposes

1.19 In order to record agency and third-party supply staff on the record, the school will require written confirmation (or a completed 'statement of checks' form) from the supply agency that it has satisfactorily completed the checks described above and will record on the SCR that this was received and hold it on file. The school does not need to carry out checks itself except where there is information contained within the disclosure. Identity checks must be carried out by the school to check the person arriving is the person the agency intends to refer to them, and there will be confirmation of this taking place on the SCR.

1.20 The governing body are responsible for ensuring the school has effective policies and procedures in place for the recruitment of all staff and volunteers in accordance with DfE requirements and legal guidelines, and that these are adhered to.

1.21 The headteacher and other management involved in recruitment are responsible for ensuring that the school operates safer recruitment procedures and that all required checks are carried out as necessary

1.22 We ensure our single central record, including pre-employment checks, is compliant with statutory guidance via checks by our head teacher and regular monitoring of this by our nominated governor for safeguarding/child protection.

Appendix G - Managing Allegations of Abuse Against Staff

See also our Staff Code of Conduct, Whistleblowing, and/or Disciplinary Procedures.

1 Introduction

1.1 The school takes seriously all allegations of abuse made against staff members, including supply staff and volunteers, and will investigate them in line with the statutory guidance, *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2026,* Part 4 and the *Sussex Child Protection and Safeguarding Procedures*, Section 6.4. We will refer to these named documents when managing allegations, which provide more detail than this summary.

1.2 We have an open and transparent culture in which all concerns are dealt with promptly and appropriately. We will treat all concerns with significance including allegations and low-level concerns.

1.3 This procedure applies to all adults working in the school or providing a service on behalf of the school to our pupils either within or outside school premises, i.e. all permanent, temporary and ancillary staff, governors, volunteers, contractors and external service or activity providers (collectively referred to as staff or staff members in this procedure).

1.4 The allegations management procedure will be used in all cases where it is alleged that a staff member, has:

- behaved in a way that has harmed a child, or may have harmed a child; or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would pose a risk of harm if they work regularly or closely with children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour which may have taken place outside of school)

1.5 Where allegations are made, the school will consider the welfare of the child alongside the investigation and support to the person subject to the allegation.

1.6 We also have a low-level concerns procedure, for instances that do not meet the thresholds described above (see paragraphs 13 below).

2 Roles and responsibilities:

2.1 Anyone who has concerns about, or has received an allegation about, the behaviour of a staff member needs to report the concerns immediately to the head teacher or the designated safeguarding lead. If the head teacher is the subject of the allegation, concerns must be reported to the chair of governors. If the designated safeguarding lead is the subject of the allegation, concerns must be reported to the head teacher. If both the head teacher and the chair

of governors are absent, the allegation needs to be reported to the Local Authority Designated Officer (LADO).

2.2 The Designated Safeguarding Lead (or a deputy) will be responsible for ensuring that the child is not at risk and referring cases of suspected abuse to Front Door for Families. Where the concern is about the DSL, the head teacher will be responsible.

2.3 The head teacher will act as the case manager for investigations of allegations and liaise with the LADO.

2.4 The chair of governors will act as the case manager, if the allegation is made against the head teacher.

2.5 The LADO is involved in providing consultation and advice to ensure allegation management procedures are followed in oversight of individual cases. They will provide advice and guidance to the case manager, liaise with the police and other agencies and monitor the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. They will follow up on any outcomes and actions from Internal Investigations.

3 Initial action by the person noticing concerns or receiving an allegation first:

- Treat the matter seriously and keep an open mind.
- Do not make assumptions or offer alternative explanations.
- Do not investigate or ask leading questions, if seeking clarification.
- Do not promise confidentiality but give assurance that the information will only be shared on a need-to-know basis.
- Act quickly.
- Make a written record of the information. Where possible, record the exact words of the person making the allegation or the child's own words.
- Record the time, date and place and names of people present when the allegation was made or concerning behaviour was observed. Record the time, date and place of alleged incidents, persons present and what was said, if these were mentioned by the person making the allegation.
- Sign and date the written record.
- Immediately report the matter to the head teacher or designated safeguarding lead or the chair of governors, as above, and give them the written record.

4 Initial response by the case manager:

- Conduct basic enquiries to establish the facts and help determine if there is any foundation to the allegation, whilst remaining careful not to investigate the incidents and only fact-finding and preserving evidence, this may include establishing whether they were in the school or college at the time of the

allegation, whether the individual did or could have come into contact with the child, whether there were any witnesses, whether there is any CCTV footage

- obtain written details of the concern or allegation, signed and dated by the person reporting it. Countersign and date the written details
- record information about times, dates and locations of incident/s and names of any potential witnesses
- record discussions about the child and/or member of staff, any decisions made and the reasons for those decisions
- Contact the LADO within one working day if the information suggests that the adult may have harmed a child, may have committed a criminal offence, or has behaved in a way indicating risk to children
- If information suggests that the adult has not harmed a child, committed a criminal offence, or behaved in a way indicating risk to children, the incident can be managed internally via HR processes, and rationale should be recorded
- If the case manager is in doubt about the above two points, they can contact the LADO for consultation, as should do so as soon as possible
- Consider impact on children involved and follow the procedures outlined in the Child Protection Procedures set out in this policy
- Refer allegations against a staff member who is no longer working in the school to the police in the first instance and then inform the LADO

5 Persons to be notified

5.1 Informing the accused: the case manager will decide when to inform the accused of the allegation and of their actions, and this may be before or after consultation with the LADO. Where the case manager is not sure on when to inform the accused, this should be raised in the consultation with the LADO and a decision made together. If appropriate, guidance on this may also be taken from the police or other involved agencies, such as Front Door for Families or Family Help services.

5.2 In cases where a strategy discussion may be required, or police and/or Family Help (including social work) need to be involved, the case manager will always discuss notifying the accused with the LADO and not inform the accused prior to the consultation with the LADO.

5.3 Notifying the family: In principle, the case manager should inform the parents or carers of the children involved about the allegation. The LADO should be consulted first to ensure that this will not impede any investigation or disciplinary process. In some cases, the parents or carers may need to be informed right away, e.g. if a child is injured and needs medical attention.

5.4 The parents or carers and the child, if sufficiently mature, should be helped to understand the process and kept informed about the progress of the case and the outcome if no criminal prosecution will take place.

6 Confidentiality

6.1 Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated. Information should be restricted to only those who need to know in order to protect the children concerned, carry out the investigation and manage the disciplinary process.

6.2 The Education Act 2011 introduced reporting restrictions that prohibit the publication of information likely to identify a teacher who is the subject of an allegation of a relevant criminal offence made by, or on behalf of, a registered pupil at the same school.

6.3 Reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about the investigation or decision from the disciplinary process. Reporting restrictions also cease if the accused person goes public themselves, thereby waiving their right to anonymity.

6.4 Breaching reporting restrictions is a criminal offence. Therefore, the case manager should inform the parents/carers about the implications of publishing details of the allegation on social networking sites. They should be advised to seek legal advice, if they wish to apply to court for removal of reporting restrictions.

6.5 The LADO, case manager, and any other agencies involved will work together to support confidentiality and how to manage speculation and press interest, should it arise. HR will support with messaging to staff.

7 Interim response and risk assessment

7.1 Suspension is not an automatic response when an allegation is reported. All options to avoid suspension will be considered prior to taking that step. The case manager will consider carefully whether the circumstances warrant suspension from contact with children at the school or college, until the allegation is resolved. We will follow guidance from *Keeping Children Safe in Education (2026)* and if considering suspension, the case manager will seek immediate consultation from their personnel adviser/Human Resources, and involve the LADO, and include the police and other involved agencies, such as Family Help services, where they have been involved.

7.2 Often, an inquiry can be resolved quickly and without the need for suspension. The case manager will consult with their personnel advisor/Human Resources and the LADO to support the case manager to decide whether the individual should continue to work at the school. Based on consultation and/or a risk assessment, the following alternatives may be considered before deciding on suspension:

- redeployment within the school or college so that the individual does not have direct contact with the child or children concerned,
- providing an assistant to be present when the individual has contact with children,
- redeploying to alternative work in the school or college so the individual does not have unsupervised access to children,

- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interests of the child or children concerned and takes account of their views. It should be made clear that this is not a punishment and parents have been consulted, or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or where available, work for the local authority or academy trust.

7.3 The school may use these alternatives whilst deciding whether to suspend and will consider the potential professional reputational damage that could result from suspension where the allegation is later found to be unfounded, unsubstantiated, malicious, or false.

7.4 Wherever suspension is used, the case manager will record rationale and what alternatives have been considered and why they were rejected.

7.5 Where it has been deemed appropriate to suspend the person, written confirmation will be given within one working day, giving as much detail as appropriate for the reasons for the suspension. The school will not leave a person who has been suspended without any support. The person will be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

8 Support

8.1 The school, together with other involved agencies, such as the police and Family Help services (including social work), will consider the impact on the child concerned and provide support as appropriate.

8.2 The head teacher will ensure that the child and family are kept informed of the progress of the investigation, subject to any legal, disciplinary, or investigative constraints, and only in relation to their child – no information can be shared regarding the staff member

8.3 The staff member who is the subject of the allegation will be advised to contact their union, professional association or a colleague and will be provided with information about available wellbeing support; the school has a duty of care towards the staff member

8.4 Human Resources/Personnel Services will be consulted at the earliest opportunity to ensure that the staff member is provided with appropriate support, if necessary, through occupational health or welfare arrangements.

8.5 The head teacher will appoint a named representative to keep the staff member updated on the progress of the investigation; this will continue during any police or section 47 investigation or disciplinary investigation.

8.6 All parties will be reminded of the need to maintain confidentiality and to avoid discussing the allegation outside the formal process, in order to protect the welfare of the child and the rights of the staff member.

9 Outcomes

9.1 Possible outcomes are:

- **Substantiated:** there is sufficient evidence to prove the allegation,
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation,
- **False:** there is sufficient evidence to disprove the allegation,
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence, or
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

9.2 The case manager will work with the LADO and Human Resources, in accordance with the guidance set out in *Keeping Children Safe in Education 2026 Part 4*, to take appropriate action in all cases. This will be on a case-by-case basis and may involve the accused returning to work or not and could include internal disciplinary procedures.

9.3 The above will include referral to the DBS (and the Teaching Regulations Agency, where appropriate) where the employer removes an individual from regulated activity (or would have removed them had they not left their post, resigned, retired or otherwise ceased to provide their services) because they have harmed a child, may have harmed a child, pose a risk of harm to a child, or have otherwise engaged in relevant conduct.

9.4 See the flow chart in Appendix H.

10 Record Keeping

10.1 In malicious or false outcomes, details will be removed from personnel records unless the individual gives their consent for retention of the information. For all other allegations, the following will be kept:

- a clear and comprehensive summary of the allegation,
- details of how the allegation was followed up and resolved,
- a note of any action taken, decisions reached and the outcome i.e. substantiated, unfounded or unsubstantiated,
- a declaration on whether the information will be referred to in any future reference.

10.2 We will provide a copy of the above to the subject of the allegation, where agreed by involved agencies, such as the police.

10.3 All records will be kept until the accused reaches normal pension age or for a period of 10 years from the date of the allegation, if that is longer.

11 References:

11.1 If the allegation was proven to be malicious, false or unsubstantiated, it will not be included in any references for the staff member.

12 Supply staff

12.1 In line with *Keeping Children Safe in Education September 2026*, under no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

12.2 The agency for the supply teacher will be fully involved and expected to co-operate in any enquiries from the LADO, police and/or Front Door for Families.

12.3 Where directed to do so by the LADO, police and/or Front Door for Families or Family Help services, the school will support any safeguarding investigation of a supply teacher by collecting the facts when an allegation is made.

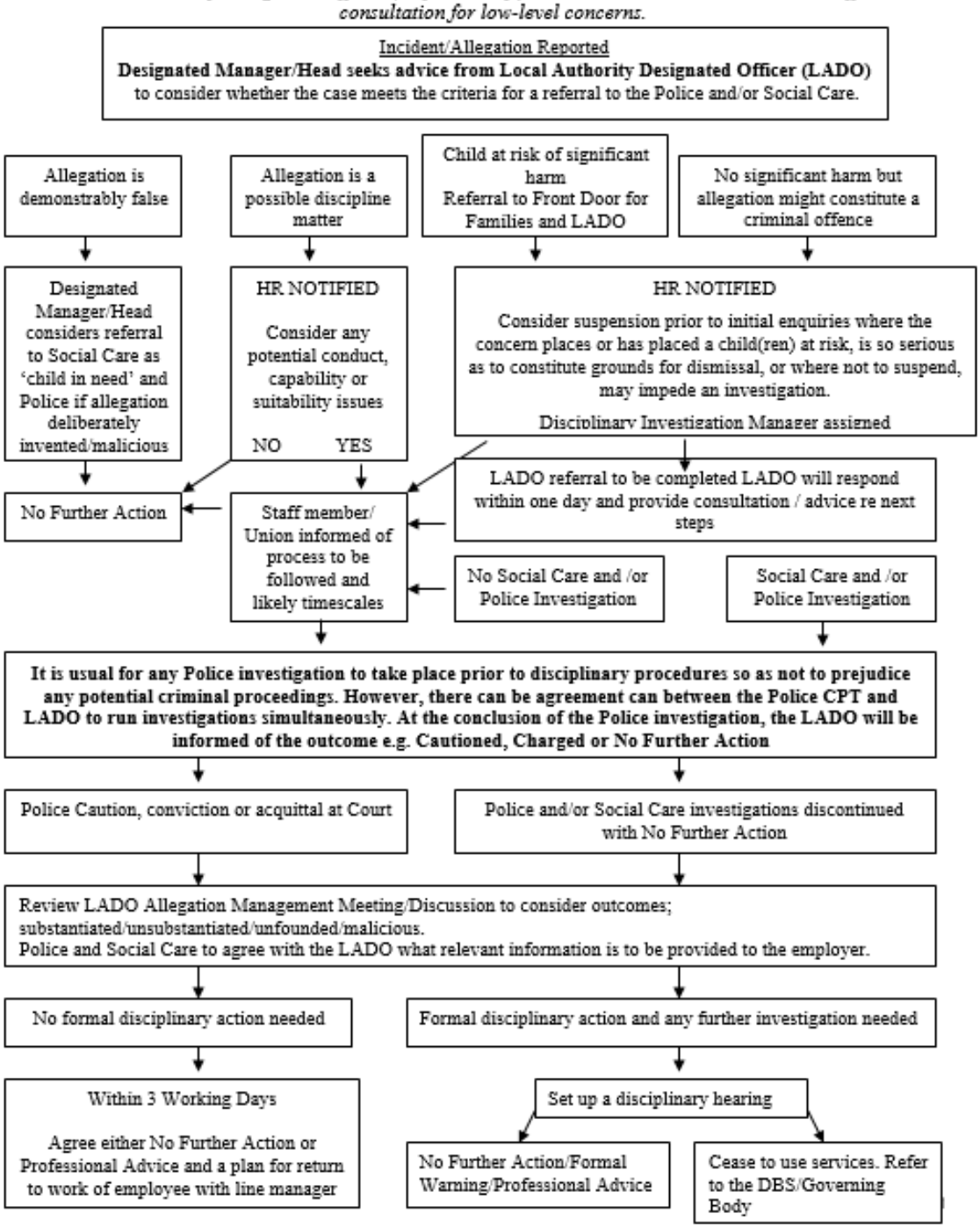
13 Low-Level Concerns

13.1 Low-level concerns are concerns that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

13.2 This might include: being overfriendly with children, having favourites, taking photographs of children on their mobile phone, contrary to school policy, engaging with a child on a one-to-one basis in a secluded areas or behind a closed door, or humiliating children.

13.3 Our Staff code of conduct includes a procedure for sharing low-level concerns and how the school will respond to these.

Appendix H – Flowchart for dealing with allegations against staff

Summary flowchart for HR/ Managers when dealing with Allegations against Staff on Child Protection Issues.

The flowchart below is designed as a quick reference guide to procedures for dealing with allegations made against staff on child protection issues. Please refer to the full guidance available through the Local Authority Designated Officer (Kay Whitcroft) and the HR Team. The LADO also offers a consultation for low-level concerns.