Bishop Luffa Learning Partnership

Rooted in Love, Together we Flourish

Child Protection and Safeguarding Policy

2026–2027

Applies to:

Bishop Luffa School

Fishbourne CE Primary School

Lavant CE Primary School

Nyewood CE Infant School

Rumboldswhyke CE Primary School

West Dean CE Primary School

Status	Approved
Date approved by the Board	20/10/2026
Review date (backstop)	By September 2027. The policy may be reviewed sooner.

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1 Introduction

1.1 How to read this policy

Throughout this policy: **must** means a legal requirement, or a Trust requirement from which there is no discretion; **will** means a commitment the Trust or the school makes; **should** means expected practice, to be followed unless there is a good reason not to, and the reason recorded; **may** means the action is permitted and is a matter of professional judgement. This follows the convention used in Keeping Children Safe in Education.

1.2 Policy statement

'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.' (*Keeping Children Safe in Education 2026*)

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to.

We maintain an attitude of "it could happen here" where safeguarding is concerned.

The purpose of this policy is to provide staff, volunteers, trustees and governors with the framework they need in order to keep children safe and secure in our schools, and to inform parents and carers how we will safeguard their children whilst they are in our care.

1.3 Aims

- To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the Trust and in each school.
- To demonstrate our commitment to protecting children.

1.4 Definitions

Child protection is an aspect of safeguarding but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

The term staff applies to all those working for or on behalf of a Trust school, full time or part time, in either a paid or voluntary capacity. It includes employed staff, supply staff, trainee teachers, volunteers and contractors. Trustees, local governors and parents are

not "staff" for the purposes of this policy, but are subject to it where they are engaged in regulated activity, and are covered separately in the sections on allegations and on regulated activity.

Child refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to pupils of our school; however, the policy applies to visiting children and students from other establishments.

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, step-parents, guardians and foster carers.

Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these, as well as children witnessing domestic abuse. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care. Explanations of these are given in Annex 8.

CEO means the Chief Executive Officer of the Trust.

1.5 Principles and values

- Children have a right to feel secure and cannot learn effectively unless they do so.
- All children have a right to be protected from harm.
- All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, whilst taking into account any contextual safeguarding.
- We acknowledge that it is essential that we work in partnership with other agencies that protect children and reduce risk and so we will engage in partnership working throughout the child protection process to safeguard children.
- Whilst the school will work openly with parents as far as possible, it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests.
- All adults working within the school should maintain professional curiosity if they are concerned about a child.
- Each school promotes an inclusive, anti-discriminatory culture in which racism and other forms of discriminatory behaviour are recognised, challenged and addressed as part of its safeguarding responsibilities.

1.6 Legal and statutory framework

This policy is made under, and should be read with, the following legislation and statutory guidance:

- section 157 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014, which place the safeguarding duty on the proprietor of an academy, that is, the Trust;
- the Children Act 1989 and the Children Act 2004;
- the Children's Wellbeing and Schools Act 2026, including the information sharing duty in section 16LA of the Children Act 2004 (in force from 30 September 2026);
- the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025;
- section 26 of the Counter-Terrorism and Security Act 2015 (the Prevent duty);
- section 5B of the Female Genital Mutilation Act 2003 (the mandatory reporting duty for teachers), with the *Mandatory reporting of female genital mutilation* procedural information (2016);
- the Crime and Policing Act 2026, which creates a mandatory reporting duty for child sexual abuse that is not yet in force (see section 2.6);
- *Keeping Children Safe in Education 2026* (KCSIE 2026), statutory guidance for schools and colleges;
- *Working Together to Safeguard Children 2026*;
- for Reception classes, section 3 of the *Early Years Foundation Stage Statutory Framework* for group and school-based providers;
- the West Sussex Safeguarding Children Partnership (WSSCP) protocols, guidance and procedures.

2 Leadership and management

We have established clear lines of accountability, training and advice to support the process of child protection and individual staff within that process.

The statutory safeguarding duty under section 157 of the Education Act 2002 rests with Bishop Luffa Learning Partnership as the academy trust. The Local Governing Body monitors safeguarding at its school and reports to the Trust Board; it does not hold the statutory duty.

Day-to-day operational safeguarding within each school is led by the headteacher and the Designated Safeguarding Lead (DSL). In this policy, "the school" means whichever of the Trust's academies named on the cover of this policy the matter concerns. All post holders named in this policy are listed in Annex 10, which is issued and version controlled separately.

All staff must follow clear escalation routes: routine concerns regarding a child's welfare must be reported immediately to the school's DSL or Deputy DSL via the school's reporting system.

In every Trust school, any individual can contact the Designated Safeguarding Lead (DSL) or a Deputy DSL if they have concerns about a child or young person. The DSL and Deputy DSL for each school are named in Annex 10, together with the nominated safeguarding governor, who monitors the effectiveness of safeguarding at the school on behalf of the Local Governing Body. Reports of allegations against a headteacher are received by the Chair of Trustees, in accordance with KCSIE 2026 paragraphs 77 to 79.

2.1 Safer recruitment and vetting

The Trust will follow safer recruitment guidance as set out in KCSIE 2026 including informing shortlisted candidates that online searches may be carried out as part of due diligence checks. The Trust will carry out the recruitment, vetting and barred list checks required by Part three of KCSIE 2026. The Trust will maintain a single central record of pre-appointment checks covering every school, structured so that each school's information can be produced separately and without delay.

From 1 September 2026 the Crime and Policing Act 2026 removed the supervision exemption from regulated activity: any volunteer who teaches, trains, instructs or supervises children frequently, on more than three days in a thirty-day period, or overnight, is in regulated activity and must have an enhanced DBS check with children's barred list information. The Trust will check the barred list status of any existing volunteer brought into regulated activity by this change. No volunteer may begin in regulated activity before the required checks are complete. Detailed arrangements are set out in the Trust's safer recruitment procedures.

2.2 Reading Keeping Children Safe in Education

All staff must read Part one of KCSIE 2026 in full, whether or not they work directly with children. The shortened version previously provided as an annex to KCSIE has been withdrawn. The school will obtain and record each staff member's written confirmation that they have read Part one of KCSIE 2026, with the date. The school will provide training and other mechanisms to help staff understand and discharge the responsibilities it sets out.

2.3 Step-by-Step Safeguarding and Escalation Procedure

This procedure is the authoritative instruction for all staff. It is summarised as a flowchart in Annex 1.

Step 1 **Immediate action and identification.** If a child is in immediate danger or requires urgent medical attention, call **999** straight away. Notify the Designated Safeguarding Lead (DSL) immediately afterwards. The DSL for the school is named in Annex 10.

Step 2 **Log the concern.** For all non-emergency welfare concerns or disclosures, you must tell the DSL immediately and must record the details factually on the school's reporting system by the end of the school day, and in any event within 24 hours. Your record must include: dates and times of your observations; dates and times of any discussions you were involved in; any injuries; explanations given by the child or adult; the action you took; and any actual words or phrases used by the child. Records must be signed and dated, with the equivalent applied to electronic records.

If your school has an early finish time, you may be required to notify the safeguarding team first and then record your report. You will be informed if this is the case in your school.

Step 3 **DSL triage and local action.** The DSL, or the Deputy DSL, reviews the report to determine next steps (for example, internal support, an Early Help assessment, or a referral to Children's Social Care).

Step 4 **Concerns or allegations about an adult.** Any safeguarding concern or allegation about a member of staff, supply staff, trainee teacher, volunteer or contractor, no matter how small, must be reported to **the headteacher of the school concerned**, without delay. The headteacher decides whether the matter is an allegation requiring referral to the Local Authority Designated Officer (LADO) or a low-level concern. Do not investigate it yourself and do not discuss it with colleagues.

- **Concerns or allegations about the headteacher** must be reported to the **Chair of Trustees**, or directly to the LADO if the Chair is unavailable.
- **Where there is a conflict of interest** in reporting the matter to the headteacher, report **directly to the LADO** (contact details in Annex 10).
- The Trust Safeguarding Lead does **not** receive allegations. Their role relates to the welfare of the child, and to patterns across Trust schools, after the matter has been triaged.
- This step applies to concerns about trustees, local governors and any other adult working with children at the school.

Step 5 **Professional challenge.** If you believe a concern about a child is not being acted on, raise it with the DSL; if you remain concerned, raise it with the headteacher, and then with the Trust Safeguarding Lead. Where the DSL is also the Trust Safeguarding Lead, or the headteacher is also the CEO, you must instead escalate to the senior board-level lead for safeguarding (named in Annex 10) or the Chair of Trustees, so that the concern reaches someone independent of the original decision. Escalating a concern is a professional duty, not a criticism of a colleague.

Step 6 **External escalation.** If a concern remains unresolved internally, any member of staff has the right and the duty to escalate the matter directly to Children's Social Care, the Local Authority Designated Officer (LADO), or the NSPCC Whistleblowing Advice Line (0800 028 0285). You do not need permission to do this and you do not need to exhaust internal routes first where a child is at risk. If you refer directly because the DSL is not available, you must inform the DSL as soon as possible afterwards.

2.4 Training

All staff must be aware of the signs and symptoms of abuse and must be able to respond appropriately. All staff must receive safeguarding and child protection training at induction, before they begin working with children, and must receive a whole-school update at least annually, with briefings during the year as guidance changes. Induction training covers this policy, the Staff Behaviour Policy, the Step-by-Step Safeguarding and Escalation Procedure, the identity of the DSL and deputies, and the school's response to children who are absent from education. The DSL and deputies must complete DSL training at least every two years and must keep their knowledge up to date through regular briefings. The DSL must ensure a safeguarding training register is maintained for each member of staff.

Any update in national or local guidance will be shared with all staff in briefings and then captured in the next whole school training. This policy will be updated during the year to reflect any changes brought about by new guidance.

Trustees and local governors receive safeguarding and child protection training at induction, and it is updated regularly, as required by KCSIE 2026.

2.5 Referral

Following any concerns raised, the DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached, or if it is not clear if the threshold is met, the DSL must contact Children's Social Care and, if appropriate, the police. If the DSL or Deputy DSL is not available or there are immediate concerns, the staff member must refer directly to Children's Social Care and the police if appropriate. The DSL will use the guidance from the National Police Chiefs' Council (NPCC) to determine when to contact the police.

Generally, the DSL will inform the parents prior to making a referral. However, there are situations where this may not be possible or appropriate, particularly when informing parents may place the child at further risk.

N.B. The exception to this process is in cases of known FGM, where there is a mandatory requirement for the teacher to report directly to the police. The DSL must also be made aware.

2.6 Forthcoming duty: mandatory reporting of child sexual abuse

The Crime and Policing Act 2026 creates a new legal duty on people undertaking regulated activity with children to report child sexual abuse to the police or the local authority when a child or a perpetrator tells them about it, when they witness it, or when they see or hear it in images, videos or recordings. It also makes it a criminal offence to prevent or deter someone from making such a report. *These provisions received Royal Assent on 29 April 2026 but are not yet in force.* The Government has said it will publish guidance before they commence; no commencement date has yet been set.

Until the duty commences, staff must continue to report any concern about child sexual abuse to the DSL without delay, in accordance with this policy, and may at any time report directly to Children's Social Care or the police. Nothing in this policy prevents any person from doing so.

The Trust will revise this policy and re-issue it to all staff before the duty comes into force, and will brief staff on what the duty requires of them personally. Staff should expect a revised policy to be adopted during the 2026–2027 school year.

2.7 Confidentiality

- Child protection information is confidential. Staff must share it only with those who need it to safeguard and promote the welfare of the child. Within the school and the Trust, staff will share information only with those who 'need to know'; sharing with other agencies is covered below.
- The Children's Wellbeing and Schools Act 2026 introduced an information sharing duty to provide clarity for safeguarding practitioners on what and when they should share information for the purposes of safeguarding and promoting the welfare of children. The information sharing duty applies to information that may help another relevant person exercise their functions, including assess risk, make a decision, provide support or take action to safeguard and promote the welfare of a child.
- Under section 16LA of the Children Act 2004 (as amended by the Children's Wellbeing and Schools Act), the school must share information with another relevant person (a person or body to whom the duty applies, for example the local authority, the police, health services and other schools and colleges) where it considers that the disclosure may facilitate that person's safeguarding or welfare functions, unless sharing the information would be more detrimental to the child than not sharing it. The school must respond in the same way to a request for information from another relevant person. The DSL and staff will have regard to *Information Sharing Duty: Statutory guidance for safeguarding organisations and their practitioners* (DfE, 2026), which replaces the earlier non-statutory advice.
- Data protection law (the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025) is not a barrier to sharing information to keep a child safe. Consent is

not required where the duty applies, but children and families will normally be told what will be shared, with whom and why, unless doing so would place a child at greater risk.

- The DSL will record on the school's safeguarding recording system each decision to share, or not to share, information, and the reasons for it.
- All staff are aware that they cannot promise a child to keep a disclosure confidential.

2.8 Teaching children to keep safe

Each school will educate pupils to recognise when they are at risk and how to get help when they need it through:

- The content of the curriculum will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with SEND.
- A school ethos which helps children to feel safe and able to talk freely about their concerns, believing that they will be listened to and valued.
- Every child having access to a 'trusted adult' in the school.
- Children will be taught about how to keep themselves and others safe when online.

2.9 Dealing with concerns and allegations against staff

If a concern is raised about the practice or behaviour of a member of staff working in or visiting a school, the information will be passed to the headteacher of the school where the concern arose. The headteacher must ensure the information is recorded. Concerns related to a member of the Trust central staff should be passed to the CEO.

The headteacher or CEO will make an assessment to determine if the matter is a 'low level concern' or an 'allegation'. The Local Authority Designated Officer (LADO) will be contacted in relation to all allegations and their guidance will be followed. If the headteacher or CEO needs advice or guidance they will contact the LADO in relation to any concern.

If a concern is raised about the CEO, the person receiving the information will contact the Chair of Trustees, who will consult the LADO. If the concern is about the Chair of Trustees, the person receiving the information will contact the nominated Trustee, who will act as case manager and will inform the LADO without delay. The full procedure is in Annex 3.

2.10 Dealing with children abusing children

If a concern is raised that a child under 18 is abusing another child under 18, the procedure in Annex 4 will be followed.

2.11 Policy review and publication

The Trust Board will review this policy at least annually in line with DfE, WSSCP and WSCC requirements and other relevant statutory guidance. The review date on the cover page is a backstop: the Trust Board may review the policy sooner. Each revision is recorded in Annex 11.

This policy takes effect in every school from the date on which the Trust Board approves it. The Trust will circulate it to each Local Governing Body as soon as possible after approval. Local Governing Bodies are informed of the policy and do not need to adopt it.

The policy will additionally be reviewed, out of cycle, on: publication of a new version of Keeping Children Safe in Education or Working Together to Safeguard Children; commencement of new safeguarding legislation; any material change to Trust or school safeguarding arrangements; and following any serious safeguarding incident or local or national learning review.

Planned mid-year revision. A restructured version of this policy, comprising a trust-wide policy and the separate contacts annex (which has a section for each school), will be prepared and approved in time for the commencement of the mandatory reporting duty under the Crime and Policing Act 2026. The Trust will announce the date of approval to staff once the commencement date is confirmed.

This policy will be published in a prominent, easily found location on each school's website.

3 Roles and responsibilities

3.1 Staff responsibilities

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this, they must:

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- Where appropriate to their role, plan opportunities within the curriculum for children to develop skills they need to recognise, assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and be alert to the signs of abuse.
- Maintain an attitude of “it could happen here” with regards to safeguarding.
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- Recognise that abuse, neglect, or other adverse childhood experiences, can have an impact on the mental health, behaviour and education of children.
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately. If the DSL is not contactable a Deputy DSL must be informed immediately.
- Be prepared to refer directly to Children's Social Care, and the police if appropriate, if there is a risk of significant harm and the DSL or Deputy DSL is not available.
- Follow the allegations procedure (Annex 3) if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the WSSCP and take account of guidance issued by the DfE.
- Support children in line with their child protection plan.
- Treat information with confidentiality but never promise to "keep a secret".
- Notify the DSL or Deputy DSL of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an understanding of 'Early Help' (the term used in West Sussex for what Working Together to Safeguard Children 2026 calls Family Help) and be prepared to identify and support children who may benefit from this intervention.
- Liaise with other agencies that support pupils and provide early help.
- Ensure they know who the DSL and Deputy DSL are and know how to contact them.
- Have an awareness of the Child Protection Policy, the Behaviour Policy, the Staff Behaviour Policy (or Code of Conduct), child on child abuse procedures, the safeguarding response for children who go missing or are absent from education and the role of the DSL.

3.2 Senior Leadership Team responsibilities

The Senior Leadership Team will:

- Contribute to inter-agency working in line with 'Working Together to Safeguard Children2026'
- Work with West Sussex County Council to coordinate an offer of early help when additional needs of children are identified.
- Ensure staff are alert to the various factors that can increase the need for early help.
- Working with Children's Social Care, support their assessment and planning processes including the school's attendance at conference and core group meetings.
- Carry out tasks delegated by the Trust Board such as training of staff, safer recruitment and maintaining the single central record.

- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the school.
- Treat any information shared by staff or pupils with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE) and the West Sussex Safeguarding Children Partnership (WSSCP) procedures.
- Determine whether a concern about a member of staff is a 'low-level concern' or an allegation.[1]

3.3 Trust Board and Local Governing Body responsibilities

The Trust Board holds the statutory safeguarding duty under section 157 of the Education Act 2002, as set out in KCSIE 2026. The Local Governing Body monitors safeguarding at its school on the Trust Board's behalf and reports to it; it does not discharge the statutory duty itself. **The Trust Board must ensure that:**

- Every school follows the Trust Child Protection and Safeguarding Policy and the Staff Behaviour Policy, has a behaviour policy, and has a safeguarding response to children who are absent from education.
- The annual safeguarding audit is completed in line with WSCC and WSSCP requirements.
- Recruitment, selection and induction follows safer recruitment practice, including all appropriate checks.
- Allegations against staff are dealt with by the school's headteacher, who acts as case manager. Allegations against the headteacher are dealt with by the Chair of Trustees as case manager, in accordance with KCSIE 2026. Where there is a conflict of interest, the matter goes directly to the LADO.
- A member of the Senior Leadership Team is appointed as Designated Safeguarding Lead (DSL) and has this recorded in their job description.
- Staff have been trained appropriately and this is updated in line with guidance.
- Any safeguarding deficiencies or weaknesses are remedied without delay.
- Each school has robust, documented arrangements to cover the DSL role when the DSL is unavailable, including a confidential shared safeguarding mailbox or equivalent system and arrangements for out-of-hours activities and trips, recorded in Annex 10.
- Where reasonably possible, each school holds more than one emergency contact number for each pupil.

[1] See Keeping Children Safe in Education 2026, Part four, section two, paragraph 509 (definition of a low-level concern).

- A nominated safeguarding governor is identified on each school's Local Governing Body, and the Trust Board appoints a trustee as the senior board-level lead for safeguarding; both are named in Annex 10.
- This policy is published in a prominent, easily found location on each school's website and is available to parents on request.
- The Trust Board receives regular, and at least annual, safeguarding reports covering training, concerns and referral volumes, allegations, any safeguarding deficiency identified and the action taken.

3.4 Senior board-level lead for safeguarding

The Trust Board appoints one of its trustees as the senior board-level lead for safeguarding, as KCSIE 2026 paragraph 86 requires. The senior board-level lead takes leadership responsibility, on behalf of the Trust Board, for the Trust's safeguarding arrangements. The senior board-level lead:

- commissions independent assurance of a school where the Trust Safeguarding Lead also holds the DSL post (see section 3.6); and
- is, with the Chair of Trustees, the route for escalating a concern where Step 5 would otherwise return it to the same person (see Step 5).

The senior board-level lead is named in Annex 10, which records any change of post-holder.

3.5 DSL responsibilities

This section is to be read in conjunction with the DSL role description at Annex B of KCSIE 2026. The DSL and Deputy DSL for each school are named in Annex 10.

In addition to the role of all staff and the Senior Leadership Team, the DSL must:

- Refer cases to social care, and the police where appropriate, in a timely manner avoiding any delay that could place the child at more risk.
- Assist the Trust Board, and the school's Local Governing Body acting on its behalf, in fulfilling their safeguarding responsibilities as set out in legislation and statutory guidance.
- Attend appropriate training and demonstrate evidence of continuing professional development to carry out the role.
- Ensure every member of staff knows who the DSL and any Deputies are, have an awareness of the DSL role and know how to contact them.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns about a child to the DSL and concerns about an adult to the headteacher.

- Ensure that those staff that need to know, are aware of those children who have experienced, or are experiencing abuse in order to promote their educational outcomes and provide the appropriate support.
- Ensure whole school training occurs regularly with at least annual updates so that staff and volunteers can fulfil their responsibilities knowledgeably.
- Ensure any members of staff joining the school outside of the agreed training schedule receive induction training prior to the commencement of their duties.
- Keep records of child protection concerns securely and separate from the main pupil file and use these records to support the assessment and likelihood of risk.
- Ensure that safeguarding records are transferred separately from pupil files when a child moves school, as soon as possible and within 5 days for an in-year transfer, or within the first 5 days of a new term. Transfer is recorded, and receipt confirmed.
- Ensure child protection records are stored securely, kept separate from the main pupil file, retained in accordance with the Trust retention schedule, and accessible only to those who need them.
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. Consideration is given to a transition meeting prior to moving if the case is complex or on-going.
- Be aware of the training opportunities and briefings provided by WSSCP to ensure staff are aware of the latest local guidance on safeguarding.
- Develop, implement and review procedures in the school that enable the identification and reporting of all cases, or suspected cases, of abuse.
- Meet any other expectations set out for DSLs in KCSIE 2026.
- Work with the school's senior mental health lead, who is named in Annex 10, where a child's mental health is a factor in a safeguarding concern. Mental health problems can be an indicator of abuse, neglect or exploitation, and the DSL remains responsible for the safeguarding response.
- Ensure that the school's DSL cover arrangements are in place and known to staff, and that the DSL or a deputy is available during school hours.
- Act on Operation Encompass and temporary accommodation notifications as part of the child's wider safeguarding picture.
- Refer to the Trust Safeguarding Lead or to the WSCC Safeguarding in Education team for advice.

3.6 Trust Safeguarding Lead responsibilities

The Trust Safeguarding Lead is a Trust-level role. **It is not a statutory role, it is not a DSL role, and it does not carry DSL authority.** KCSIE 2026 places lead responsibility for

safeguarding and child protection with the designated safeguarding lead at each school, provides that this lead responsibility must not be delegated, and states that it is not appropriate for the proprietor, which for an academy means the academy trust, to be the designated safeguarding lead. The role below is defined so that it supports the DSL role without displacing it.

The Trust Safeguarding Lead does:

- Provide advice, support and a source of challenge to DSLs across the Trust, at the DSL's request or on their own initiative.
- Provide assurance to the CEO and the Trust Board that safeguarding arrangements at each school are effective. In order to discharge this responsibility, the Trust Safeguarding Lead has delegated authority from the Trust Board to access confidential safeguarding records held within each school in relation to children. Such access will be for audit and assurance purposes, with the DSL's knowledge, and proportionate to the purpose.
- Maintain oversight of training, record keeping, policy compliance and the quality of practice across the Trust.
- Identify patterns and risks visible across more than one school that an individual DSL would not see.
- Support a school in an advisory capacity, without acting as case manager, in complex, high-risk or protracted cases (involving pupils or staff), at the invitation of the DSL or the headteacher.
- Act as an escalation point for professional challenge where a member of staff believes a concern is not being acted on at school level.
- Co-ordinate the Trust's relationship with the local authority, the safeguarding partnership and the diocese on safeguarding matters of Trust-wide significance.
- Commission or conduct safeguarding audits and follow up the actions arising.

The Trust Safeguarding Lead does not:

- Act as the designated safeguarding lead, or as a deputy DSL, for any school. Where the post holder also holds a DSL post at a school, the two roles are exercised separately and the post holder does not use the Trust role to act on matters belonging to the school role, or the reverse.
- Take, or direct, the decision on whether to refer a case to Children's Social Care. That decision rests with the DSL. The Trust Safeguarding Lead may advise, and may challenge a decision, but cannot overrule it and cannot instruct a DSL to withdraw or alter a referral.

- Receive concerns or allegations about members of staff. These go to the headteacher, or to the Chair of Trustees where the headteacher is the subject, in accordance with KCSIE 2026 paragraphs 77 to 79.
- Act as case manager for an allegation. KCSIE 2026 provides that the case manager is the headteacher, or the Chair of Trustees where the headteacher is the subject of the allegation.
- Decide whether a matter meets the LADO threshold, or make the referral to the LADO. That is for the case manager.
- Hold or manage a school's child protection records, except where necessary for a specific audit or a case in which the school has requested support, and then with the DSL's knowledge.

Where the Trust Safeguarding Lead also holds a DSL post at a school, assurance of that school will be provided by another person, commissioned by the senior board-level lead for safeguarding (named in Annex 10), and reported directly to the Trust Board.

Where the Trust Safeguarding Lead disagrees with a DSL

Disagreement is raised first with the DSL, then with the headteacher, and then with the CEO. It is not resolved by the Trust Safeguarding Lead substituting their own decision. Where the Trust Safeguarding Lead believes a child remains at risk, they may, like any other person, make a referral to Children's Social Care or contact the LADO directly, and must do so rather than allow a disagreement about process to delay protection of a child.

Where the concern is about the Trust

Safeguarding concerns relating to the Trust as an organisation must be reported to the Chair of Trustees, or to the NSPCC Whistleblowing Advice Line. A concern relating to the CEO must be reported to the Chair of Trustees, who will consult the LADO. A concern relating to the Trust Safeguarding Lead must be reported to the CEO, or directly to the LADO if there is any conflict of interest.

4 Child protection procedures

4.1 Overview

The following procedures apply to all staff working in the school and will be covered by training to enable staff to understand their role and responsibility. The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or is at risk of harm.

The prime concern at all stages must be for the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children, those with disabilities, special needs, certain medical conditions or with language deficit / English as a second language may have more difficulty in communicating concerns or feelings. They may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility, which will include children (for example younger siblings) visiting the site in addition to pupils.

If a member of staff suspects abuse, spots signs or indicators of abuse, or has a disclosure of abuse made to them, they must follow the Step-by-Step Safeguarding and Escalation Procedure in section 2.3**.** That procedure is the authoritative instruction for all staff and includes what to record and when.

Two points from the Step-by-Step Safeguarding and Escalation Procedure are repeated here because they apply directly to the DSL procedure that follows:

- The DSL will consider whether immediate medical intervention is required. Urgent medical attention must not be delayed if the DSL is not immediately available.
- In the absence of the DSL and the Deputy DSL, any member of staff must be prepared to refer directly to Children's Social Care, and the police if appropriate, where there is potential for immediate significant harm. This is separate from the professional challenge route at Step 5.

4.2 Action by the DSL

Following a report of concerns the DSL must:

1. Decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to Children's Social Care and the police if it is in keeping with the National Police Chiefs Council "When to call the Police" guidance. The rationale for this decision should be recorded by the DSL
2. Normally the school should try to discuss any concerns about a child's welfare with the family and where possible seek their agreement before making a referral to Children's Social Care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could have an impact on a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be considered when appropriate.
3. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm the DSL (or Deputy) must contact Children's Social Care via Request support or raise a concern about a child - West Sussex County Council making a clear statement of:
   - the known facts

- any suspicions or allegations
- whether or not there has been any contact with the child's family.

4. If there is indication that the child is suffering significant harm, the DSL will also call the Integrated Front Door (contact details in Annex 10).
5. If a child is in immediate danger and urgent protective action is required, the police must be called. The DSL must then notify Children's Social Care of the occurrence and what action has been taken.
6. When a pupil needs *urgent* medical attention and there is suspicion of parental abuse causing the medical need, the DSL or their Deputy should take the child to the nearest hospital with an accident and emergency facility and must inform Children's Social Care. Advice should be sought from Children's Social Care about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
7. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider the Early Help process.
8. In cases of allegations against staff, the procedure in Annex 3 will be followed; low-level concerns will be dealt with under the Trust Low-Level Concerns Policy.

The recording form and skin map are at Annex 12 and Annex 13.

4.3 Children missing education and elective home education

Children missing education can be a warning sign of abuse, neglect or exploitation. The school must monitor attendance and must follow up unexplained absence on the first day. The school must notify the local authority of any pupil who fails to attend regularly, or who is absent for a continuous period of ten school days or more without authorisation, and must make the returns required by the School Attendance (Pupil Registration) (England) Regulations 2024, including when a pupil's name is to be added to or deleted from the admission register at a non-standard transition point. Detailed arrangements are set out in the Trust Attendance Policy.

Where a parent or carer expresses an intention to remove a child to educate them at home, the school will notify the local authority and will work with it to arrange a meeting with the parents or carers before a final decision is made, particularly where the child has special educational needs or a disability, has a social worker or is otherwise vulnerable. When the relevant provisions of the Children's Wellbeing and Schools Act 2026 come into force, the school must notify the local authority of any intended removal for home education, and must not remove from the roll a child who attends a special school, or who is or in the last five years has been the subject of child protection enquiries or action, unless the local authority has given consent. The Trust will confirm the commencement date to schools.

4.4 Child exploitation and contextual safeguarding

Children can be at risk of criminal exploitation, including county lines, and of sexual exploitation, both of which may involve children being coerced while appearing to consent. Exploitation can be committed or facilitated by an individual or by an organised network or gang, and a child who is exploited is a victim even where they have been coerced into committing offences. Staff must be alert to indicators including unexplained absence, unexplained money or possessions, changes in peer group, and injuries, and must report concerns to the DSL in the usual way. The DSL must consider contextual risk, meaning harm arising outside the home, when assessing and referring, and will share information with partners in accordance with local arrangements.

Staff must also be alert to modern slavery and trafficking, financial exploitation and serious violence, including knife crime. Where a potential victim of child criminal or sexual exploitation is identified, the DSL will make a child protection referral to Children's Social Care and will ensure a modern slavery referral is considered, in accordance with the Modern Slavery statutory guidance.

4.5 Looked-after and previously looked-after children

The most common reason for a child to be looked after is abuse or neglect. The school must have a designated teacher for looked-after and previously looked-after children, named in Annex 10, who will work with the local authority Virtual School Head. The DSL must hold details of each looked-after child's legal status, contact arrangements and care arrangements, and must ensure that staff who need to know are informed. The DSL and designated teacher will also work with the Virtual School Head in relation to children who have a social worker and children in kinship care, including to improve their attendance.

4.6 Domestic abuse

Children who witness or experience domestic abuse are victims in their own right. The police must notify the school, through Operation Encompass, where they have reasonable grounds to believe a child may be a victim of domestic abuse, including where the child was not present at the incident. The DSL will ensure the information is received before the start of the next school day where possible, and that appropriate support is in place. The information must be recorded and must be shared only with those who need to know. Notifications from the local housing authority that a child has been placed in temporary accommodation will be treated in the same way. Neither type of notification replaces a referral to Children's Social Care where a child has been harmed or is at risk of harm.

4.7 Private fostering

A private fostering arrangement is one in which a child under 16, or under 18 if disabled, is cared for by someone who is not a parent or close relative, for 28 days or more. Where the

school becomes aware of such an arrangement it must notify the local authority, whether or not the arrangement appears satisfactory.

4.8 Children who may be at greater risk of harm

Some children face additional barriers to recognising abuse or being heard. Staff must be particularly alert to the needs of children with special educational needs or disabilities or with medical conditions, those who have or have had a social worker, young carers, children in care or previously in care, those who are LGB or gender-questioning, children with a parent in prison, those who are absent from education, and those who have been repeatedly removed from the classroom, have had multiple suspensions, are on a part-time timetable or are at risk of permanent exclusion. Behaviour, mood or injury must not be attributed to a child's disability or condition without exploring whether abuse or neglect is a factor, and staff must not assume that a child who does not disclose is not at risk.

An incident relating to the management of a child's medical condition, including allergies, does not in itself warrant a safeguarding referral. A referral is needed where the incident suggests the child may be at increased risk of neglect, abuse or exploitation because of their medical condition, for example where relevant information about the condition is not provided to the school or the child is repeatedly sent to school without essential medication. Each school's medical conditions policy applies.

4.9 Children who are questioning their gender

Each school will follow Part two of KCSIE 2026 on children who are questioning their gender, including its guidance on requests for social transition, the use of toilets and changing rooms, and single-sex sport. Schools will not initiate social transition. Where a child who is questioning their gender asks for support, the school will engage the child's parents or carers as a matter of priority. In the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the school will involve the DSL to determine what action is needed to safeguard the child before the parents or carers are contacted or any decisions are taken. The school will document its decision-making and keep records. Where a child confides in a member of staff but does not ask for any change in how they are treated, staff must not break that confidence unless there is a related safeguarding risk. Primary schools, including infant schools, will exercise particular caution. Any related safeguarding concern must be referred to the DSL.

4.10 Alternative provision

Where the school places a pupil with an alternative provider, the school remains responsible for that pupil's safeguarding. Before any placement the school must obtain written confirmation from the provider that the checks required by Part three of KCSIE

2026 have been completed on all staff working with the pupil, and the DSL must be satisfied that the provider's safeguarding arrangements are adequate.

4.11 Work experience, homestay and exchange visits

Where the school arranges for a pupil to undertake work experience, or to be accommodated by a host family in the United Kingdom or abroad, the school must consider what checks are appropriate on the adults who will have responsibility for the pupil, in accordance with Part three of KCSIE 2026, and must record its assessment. Where a host family arrangement is made by the school, the school must obtain an enhanced DBS check on the adults in the household. This section applies to any school that makes such arrangements, principally Bishop Luffa School.

4.12 Use of reasonable force

Staff may use reasonable force to prevent a pupil from hurting themselves or others, damaging property, or causing disorder, in accordance with the Trust Behaviour Policy and the Department for Education's advice *Restrictive interventions, including use of reasonable force, in schools*. Force must never be used as a punishment. Where a pupil has special educational needs or a disability, mental health needs or a medical condition, staff must recognise their additional vulnerability, take account of the school's duties under the Equality Act 2010, including reasonable adjustments and the Public Sector Equality Duty, and plan positive and proactive behaviour support so as to reduce the occasions on which force may be needed. Every use of force must be recorded and reported to the DSL.

4.13 Use of school premises by other organisations

Where the school allows its premises to be used by another organisation, or where before- or after-school provision is run by a third party on school premises, the school must obtain written assurance that the organisation has appropriate safeguarding and child protection policies and procedures in place, including inspecting these where appropriate, and that it has arrangements for liaising with the school on safeguarding matters. The arrangement must be set out in a written agreement and the school must terminate it where these assurances are not met.

4.14 Early years (Reception) provision

Schools with Reception classes are subject to the safeguarding and welfare requirements in section 3 of the *Early Years Foundation Stage Statutory Framework*, which must be read alongside KCSIE 2026.

In Reception classes and on Reception outings:

- images of children must be taken only for purposes the school has agreed, on equipment the school has approved for that purpose, and in line with the Trust's data protection arrangements and the consent given by parents or carers;
- personal devices must not be used while children are present, except in the circumstances the Trust Staff Behaviour Policy permits, for example in an emergency or for multi-factor authentication of school systems;
- staff must take a school mobile phone on outings for use in an emergency;
- the Trust Staff Behaviour Policy sets out the practical arrangements, including which devices may be used for images, how images are stored, transferred and deleted, and how visitors are told, and staff, volunteers and visitors must follow it;
- no volunteer may begin working in the Reception class until the school has received their enhanced DBS certificate with children's barred list information.

Any concern about the use of a device in the setting must be reported to the DSL or, if it concerns a member of staff, to the headteacher in accordance with Annex 3.

Annex 1

Flowchart for child protection procedures

This flowchart summarises the Step-by-Step Safeguarding and Escalation Procedure in section 2.3. Where they differ, section 2.3 applies.

Concern about a child

A concern about a child. You notice signs or indicators of abuse or neglect, a child tells you something, or someone else raises a concern with you.
▼
Is the child in immediate danger or in need of urgent medical attention? If yes, call **999** and then tell the DSL.
▼
Listen and reassure. Do not promise confidentiality, do not ask leading questions and do not investigate (Annex 2).
▼
Tell the DSL immediately (Step 2). If the DSL is not available, tell a Deputy DSL. If neither is available and there is a risk of significant harm, refer directly to the Integrated Front Door and tell the DSL as soon as possible afterwards.
▼
Record what you saw and heard, the child's own words, the date and time and who was present, by the end of the school day and in any event within 24 hours. Use the skin map (Annex 13) to record visible injuries.
▼
The DSL decides, and records the reasons: monitor and support in school; Early Help; or a referral to Children's Social Care through the Integrated Front Door, and to the police where appropriate. Reports of rape, assault by penetration or sexual assault are passed to the police (Annex 4).
▼
Follow up. The DSL tells you what has happened. If you remain concerned, use professional challenge (Step 5) or external escalation (Step 6).

* In cases of known FGM, the teacher who was made aware must also report it to the police.

Concern about an adult who works with children

A concern or allegation about an adult who works with children, including staff, supply staff, volunteers, contractors, trustees and local governors.
▼

Report it to the headteacher without delay. If it is about the headteacher, report it to the Chair of Trustees. If it is about the CEO, report it to the Chair of Trustees. If there is a conflict of interest, report it directly to the LADO (Annex 3).
▼
The case manager decides. An allegation that meets the harm threshold is discussed with the LADO without delay and before any investigation. A low-level concern is dealt with under the Trust Low-Level Concerns Policy.

Abbreviations

CSC	Children's Social Care
DSL	Designated Safeguarding Lead
IFD	Integrated Front Door, the West Sussex point of contact for referrals to Children's Social Care
LADO	Local Authority Designated Officer
LLC	Low-level concern

Annex 2

Dealing with disclosures

All staff should

A member of staff who is approached by a child should maintain a positive attitude and try to reassure them. They must not promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preferred communication method.

All staff must know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the right to make a referral to the police or social care directly and must do this where a child is at immediate risk and, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home.

Guiding principles: the three Rs

Recognise

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable
- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep, e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure e.g. you could say: 'I am listening to you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond

- Respond to the pupil only as far as is necessary for you to establish whether you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later court proceedings
- Do not ask the child why something has happened

- Do not criticise the alleged perpetrator; the pupil may care about them, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and to whom you need to talk. Reassure the pupil that it will be a senior member of staff in confidence.

Report

- Share concerns with the DSL immediately
- If you are not able to contact the DSL or a Deputy DSL, and the child is at risk of immediate harm, contact Children's Social Care directly.
- If possible, make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- Complete a skin map (Annex 13) to indicate the position of any noticeable bruising or marks
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.
- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Try to get some support for yourself if you need it.
- All staff should be aware that children may not feel ready or know how to tell somebody that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful.

Consideration

- Has the action taken provided positive outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened

after the report being made. If they do not receive this information, they should be proactive in seeking it out.

If a staff member believes that their concerns have not been dealt with effectively or that the child remains at risk, they should initially ask the DSL to reconsider ensuring that the risks are understood. If this does not result in a satisfactory outcome, or the DSL rationale appears to miss the risk to the child, they can refer to the Trust DSL or use the Whistleblowing procedures of the school. If the DSL is unhappy with the response from Children Social Care, they should consider following the WSSCP escalation protocol, beginning with a manager to manager conversation.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed the procedure correctly and that their swift actions will enable the allegations to be handled appropriately. For some staff, use of an employee-based counselling service may be appropriate.

Annex 3

Allegations against adults who work with children

The Trust's Low-Level Concerns (LLC) Policy applies in every Trust school.

Allegations as defined by KCSIE must be reported to the LADO. Complaints or concerns can be managed by the school under internal procedures.

Complaints could include:

- Breaches of the code of Conduct
- Any breach of data protection or confidentiality
- Poor behaviour management
- Inappropriate use of social media
- Misadministration of medication

Concerns could include:

- Inappropriate use of language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence, of pupils
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such.

Low-level concerns, which do not reach the allegations harm threshold (or complaints criteria), must be dealt with under the Trust Low-Level Concerns Policy.

Procedure for allegations that meet the harm threshold

This procedure must be used in all cases when it is alleged that a member of staff, supply staff, trainee teacher, volunteer, contractor, trustee, local governor or another adult who works with children has either:

- 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 he or she would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

When considering allegations of suitability (the fourth criterion above), the LADO would consider the following situations:

- Parents of children who are placed on a CIN plan or are receiving Early Help;
- Arrests for offences against adults;
- Presentation to other professionals around mental health, domestic abuse and/or substance misuse;
- Extreme political or religious viewpoints which could be considered Hate Crime;

- Concerns about behaviour in their private lives which may impact on children

In any of these situations the LADO criteria for intervention will be assessed against the likelihood and impact of transferable risk to children.

In line with the Trust's referral process:

- Staff will report any concerns about the conduct of any member of staff, supply staff or volunteer to the school's headteacher as soon as possible.
- If an allegation is made against the school's headteacher, the concerns must be raised with the Chair of Trustees as soon as possible. If the Chair of Trustees is not available, or there is a conflict of interest, the LADO must be contacted directly. KCSIE 2026 provides that the case manager is the Chair of Trustees where the headteacher is the subject of the allegation. The CEO will be informed (unless conflicted), while the Chair of Trustees remains the case manager.
- If an allegation is made against the CEO, it must be raised with the Chair of Trustees, who will act as case manager and consult the LADO. If an allegation is made against the Chair of Trustees, it must be raised with the nominated Trustee of the Trustees, who will act as case manager and must inform the LADO without delay.
- There may be situations when the headteacher or Chair of Trustees will want to involve the police immediately, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the case manager, they will contact the LADO as soon as possible and before carrying out any investigation into the allegation.
- Inform the parents of the allegation unless there is a good reason not to

In liaison with the LADO, the school will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care and/or the police.

When receiving information from outside agencies about school staff, the LADO will assess the potential for transferable risk and make a disclosure to the school where there is the likelihood of transferable risk to children and there is a pressing need.

If the matter is investigated internally, the LADO will advise the school to seek guidance from their personnel/HR provider in following procedures set out in Part 4 of 'Keeping Children Safe in Education' (2026) and the WSSCP procedures.

Supply staff

While supply staff are not employees of the school, it is still required that the school report the allegation to the LADO.

If the matter requires an internal investigation, this will be carried out by the school in liaison with an HR rep (acting as the employer) from the supply agency.

Trainee teachers

Concerns or allegations about a trainee teacher are dealt with by the headteacher under this annex in the same way as for staff. The headteacher will inform the trainee's initial teacher training provider, and will consult the LADO where the harm threshold may be met. The school and the provider share safeguarding responsibility and will agree who takes which actions.

Low-level concerns (LLCs)

The Trust's Low-Level Concerns Policy is part of the whole school approach to safeguarding. The purpose of the policy is to encourage an open and transparent culture, which enables the school to identify concerning, problematic or inappropriate behaviour at an early stage. It should also empower staff to share LLCs with the DSL. LLCs will be managed by the school under the Trust Low-Level Concerns Policy.

Examples of LLCs include, but are not limited to:

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

The LLC policy will:

- Ensure that staff are clear about what constitutes appropriate behaviour, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- Empower staff to share any low-level safeguarding concerns with the DSL;
- Address unprofessional behaviour and support the individual to correct this at an early stage;
- Provide a responsive, sensitive and proportionate handling of such concerns when they are raised;
- Help identify any weakness in the school's safeguarding system.

In line with the LLC policy:

- All LLCs will be shared responsibly with the DSL, recorded in writing and dealt with in an appropriate and timely manner.
- All LLCs will be reviewed, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- If LLCs are found to be escalating and are reaching the harm threshold, a referral will be made to the LADO.

If there is any doubt about the level at which behaviour needs to be addressed, LADO advice will be taken.

Annex 4

Child-on-child abuse, including sexual violence and sexual harassment

This annex sets out how each school prevents and responds to child-on-child abuse in all its forms. For sexual violence and sexual harassment it should be read with Part five of KCSIE 2026, *Child-on-child sexual harassment and sexual violence*, which was substantially rewritten for 2026 to reflect the progressive continuum from harmful sexual behaviour to sexual violence.

Context

This applies to all reports and concerns of child-on-child abuse, including those that have happened outside school premises or online. All staff are advised to maintain an attitude of "It could happen here".

Schools not recognising, acknowledging or understanding the scale of harassment and abuse, and /or downplaying some behaviours relating to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in a worst-case scenario a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Sexual violence and sexual harassment

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This can adversely affect their educational attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. It is also important to recognise that some perpetrators may themselves also be victims.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children and young people including school and college staff are supported and protected as appropriate.

Policy

All children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and by other children. However, we recognise

that children are capable of abusing their peers, including online. Child-on-child abuse may be taking place even where no cases have been reported. For some (but not all) forms of child-on-child abuse girls are more likely to be victims and boys perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

This policy is underpinned by the principle that there is a zero-tolerance approach to child-on-child abuse of every kind, including sexual violence and sexual harassment. It must never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys", as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children. We are clear that child-on-child abuse is not acceptable, will never be tolerated and is not an inevitable part of growing up.

Child-on-child abuse in its widest sense can take different forms including:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence and sexual harassment, which may include misogyny or misandry. Part five of KCSIE 2026 sets out how schools should respond to reports of this nature
- consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated or altered using AI (for example deepfakes); the school's approach is set out below
- 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
- upskirting (which is a criminal offence), 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
- initiation/hazing type violence and rituals

Prevention

Each school will minimise the risk of child-on-child abuse by:

- Promoting an inclusive and respectful school culture in which abusive and discriminatory behaviour is recognised, challenged and addressed.
- Taking a whole school approach to safeguarding and child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the curriculum
- Engaging with specialist support and interventions.

Responding to all reports of child-on-child abuse

Whatever its form, a report of child-on-child abuse must be taken seriously. For every report:

- staff must tell the DSL immediately, and the DSL will decide the response;
- the DSL will record the report, the decisions taken and the reasons on the school's safeguarding recording system;
- the DSL will consider an immediate risk and needs assessment for the child who has been harmed, the alleged perpetrator and any other child affected, and will keep it under review;
- the DSL will refer to Children's Social Care where a child is at risk of harm, and to the police where the behaviour may be a criminal offence, for example a physical assault, a threat or assault with a weapon, upskirting or a hate crime;
- the school will investigate and deal with the report under its behaviour and anti-bullying policies, unless the police or Children's Social Care ask it not to, and will not wait for an outside investigation before protecting children;
- the school will support the child who has been harmed, the alleged perpetrator and any other child affected, because child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator;
- parents or carers of the children involved will normally be informed, unless doing so would put a child at greater risk or prejudice an investigation; and
- Children can report concerns to any member of staff they trust. Each school publicises to pupils how they can report concerns, so that the routes are well promoted, easily understood and easily accessible.

Reports of sexual violence and sexual harassment are also dealt with as set out below.

Responding to reports of sexual violence and sexual harassment

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be supported.

- Understanding that the initial response to a report from a child is incredibly important and can encourage or undermine the confidence of victims of sexual violence and harassment to report or to come forward in the future.
- If the report includes an online element, staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2022): Searching, Screening and Confiscation (publishing.service.gov.uk) guidance.
- Staff taking the report will inform the DSL or their Deputy immediately.
- Staff taking a report will never promise confidentiality.
- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care. Where a report of rape, assault by penetration or sexual assault is made, the starting point is that it will be passed to the police, including where the alleged perpetrator is under ten; this will generally be in parallel with the referral to Children's Social Care.

Nudes and semi-nudes

Every incident involving the making or sharing of nudes or semi-nudes of a child, whether consensual or not and including images created or altered using AI, requires a safeguarding response.

- Staff must not view, copy, print, forward or delete the image, and must not ask a child to show or send it to them.
- Staff must secure any device involved where it is safe to do so, and must refer the matter to the DSL immediately.
- The DSL will respond in line with the UKCIS Education Group advice *Sharing nudes and semi-nudes: advice for education settings working with children and young people* and the DfE *Searching, screening and confiscation* advice, will view an image only where that advice permits, and will refer to Children's Social Care and/or the police where required.
- The children involved will be supported, and will be helped to understand that making or sharing nude images of anyone under 18 is illegal, even where it is consensual.

Risk assessment

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis. The risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs, and any disciplinary action.
- All other children at the school.

- The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils and form a risk reduction plan.

Action

The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children/young people involved.
- Developmental stages of the children/young people.
- Any power imbalance between the children/young people.
- Any previous incidents.
- On-going risks.
- Other related issues or wider context.

Process for responding to reports of sexual violence and sexual harassment

1. **Receive and record the disclosure or concern:** listen to the child, avoid leading questions, record their account accurately and report immediately to the DSL.
2. **Immediate safeguarding assessment:** the DSL considers the child's immediate safety and whether urgent action is required.
3. **Refer or seek advice promptly:** where the report is of rape, assault by penetration or sexual assault, the starting point is that it will be passed to the police, normally alongside a referral to Children's Social Care. For other reports that may constitute an offence, the DSL will consider police referral at an early stage, normally alongside a referral to Children's Social Care.
4. **Consider parental contact:** the DSL must consider whether and when to inform the parents or carers of the alleged victim and the parents or carers of the alleged perpetrator, taking advice from Children's Social Care and/or the police where appropriate. Parents or carers should not be contacted if doing so could place a child at increased risk or prejudice a safeguarding or criminal investigation.
5. **Avoid unnecessary investigation by the school:** once sufficient information has been obtained for referral, do not undertake detailed or repeated questioning of the child.
6. **Consider contact with the alleged perpetrator** only where appropriate and, where the police or Children's Social Care are involved, after seeking advice from the relevant agency.

7. The DSL determines the safeguarding pathway, which may include:
   - managing the report through school safeguarding procedures;
   - a referral to Early Help;
   - a referral to Children's Social Care;
   - a report to the police, normally alongside a referral to Children's Social Care.
8. Follow multi-agency advice: the school will cooperate with Children's Social Care and/or the police. It will not investigate the facts in parallel without the agreement of the police or Children's Social Care, but will continue to protect and support the children involved and may consider disciplinary action after liaison with those agencies.

Ongoing response

- All concerns, discussions and decisions made, and the reasons for those decisions, must be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.
- The DSL will manage each report on a case-by-case basis and will keep the risk reduction plan under review.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim during that investigation.
- The DSL will consider how best to keep the victim and perpetrator apart on school premises and transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the school would seriously harm the education or welfare of the victim (and potentially other pupils).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school will, if it has not already, consider any suitable sanctions in light of its behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the school, the principle of keeping the victim and perpetrator in separate classes where possible should be maintained and continued. Consideration would be given to the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and other witnesses (children and adults) will receive appropriate support and safeguards on a case-by-case basis.

- When ongoing support is required by the victim, the victim should be asked whether they would find it helpful to have a designated trusted adult to talk about their needs. The choice of any such adult should be made by the victims (as far as reasonably possible) and this choice should be supported.
- The school will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in the school.
- The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

Unsubstantiated, unfounded, false or malicious reports

- If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and whether this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.
- If a report is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it, in accordance with its behaviour policy.

Physical abuse

While a clear focus of child-on-child abuse is linked to sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.

These are equally not tolerated and, if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

Reference: KCSIE 2026, Part five.

Annex 5

Online safety, artificial intelligence and mobile phones

Each school within the Trust acknowledges it is essential to safeguard children from potentially harmful and inappropriate online material.

A comprehensive approach to online safety empowers staff to protect and educate children and colleagues in their use of technology and establishes the mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories;
- **contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated or altered using AI, e.g. deepfakes), sharing other explicit images and online bullying; and
- **commerce**: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff believe that pupils or staff are at risk, the school will report it to the Anti-Phishing Working Group (https://apwg.org/).

Each school will ensure that online safety is a running and interrelated theme when devising and implementing policies and procedures.

The Trust will ensure each school meets the DfE filtering and monitoring standards, reviews its provision at least annually, and considers the Cyber security standards for schools and colleges.

Within each school, there must be appropriate filtering and monitoring in place on all school devices and school networks. The effectiveness of the provision must be reviewed at least once every academic year. The review should be led by the member of the senior leadership team responsible for filtering and monitoring, named in Annex 10, supported by the DSL and IT support; it must include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record of the checks must be

kept. Staff training should include understanding roles and responsibilities in relation to filtering and monitoring.

Each school will consider how online safety is reflected as required in all relevant policies and embedded across all areas of the curriculum, included in teacher training and within the role and responsibilities of the designated safeguarding lead as well as discussions with parents.

Artificial intelligence (AI)

The Trust will apply the DfE generative AI product safety expectations when approving AI tools.

Generative AI: product safety expectations - GOV.UK

Using AI in education settings: support materials - GOV.UK

Mobile phones

In line with KCSIE 2026, all Trust schools will be mobile phone-free environments by default. Children will not have access to their mobile phone throughout the school day, including during lessons, the time between lessons, breaktimes and lunchtime. Each school's headteacher decides how this is achieved and may vary the arrangements for that school, including any exception (for example, for sixth form students), in the school's own behaviour policy. Any exception must be by exception only. Variations are a matter for the school and are not recorded in this policy or its annexes.

Annex 6

Whistleblowing

Whistleblowing in a safeguarding context

Whistleblowing procedures protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

This annex should be read in conjunction with the Trust's whistleblowing policy.

The whistleblowing policy is not designed to be used for concerns that fall under statutory procedures (for example child protection or allegations against staff) as these should be reported under the relevant procedures. However, the whistleblowing policy will apply if there is good reason to believe that the relevant procedure is not being followed or will not be followed effectively.

If you are concerned that any member of staff is not following safeguarding processes, or is behaving in a way that places children at risk, you should make the headteacher aware. Contact details are in Annex 10.

If your concern is about the headteacher, raise it with the Chair of Trustees.

If your concern is about the Trust, or about how the Trust has responded, raise it with the CEO or the Chair of Trustees.

If you would prefer to raise your concerns outside the school and the Trust, you can contact (contact details in Annex 10):

- Children's Social Care, through the Integrated Front Door
- the Local Authority Designated Officer (LADO)
- The NSPCC Whistleblowing Advice Line on 0800 028 0285
- The police, on 101, or 999 in an emergency

You do not need to raise a concern internally first.

Annex 7

Briefing sheet for temporary and supply staff

For supply staff and those on short contracts

While working in the school, you have a duty of care towards the children and young people here. This means that at all times you should act in a way that is consistent with their safety and welfare. In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school designated safeguarding lead (DSL). The DSL for this school, and where to find them, are recorded in Annex 10 and on the briefing given to you on arrival.

This is not an exhaustive list, but you may have become concerned as a result of:

- Observing a physical injury, which you think may have been non-accidental.
- Observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for.
- Observing child behaviour that leads you to be concerned about a child or young person.
- A child or young person telling you that they have been subjected to some form of abuse
- Observing adult behaviour that leads you to be concerned about their suitability to work with children or young people.

In any of the circumstances listed here, you must tell the DSL immediately. You must also write down what you saw or heard, date and sign your account, and give it to the DSL by the end of the school day and in any event within 24 hours. This may be the beginning of a legal process; it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:

- Rather than directly questioning the child, just listen and be supportive
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish.
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help; do not promise confidentiality. You are obliged to share any information relating to abuse or neglect.
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it and give your record to the DSL who will follow due process, including contacting Children's Social Care if appropriate.

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, on the school's website and from the school office.

If your concern involves the DSL or a member of the senior staff, inform the headteacher and consider contacting the LADO (contact details in Annex 10).

Remember, if you have a concern, report it.

Annex 8

What is child abuse?

The following definitions are taken from *Keeping Children Safe in Education 2026* (paragraphs 25 to 29), which mirror *Working Together to Safeguard Children 2026*. In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, through honour-based violence, forced marriage or female genital mutilation.

To support the local context, all staff have access to the West Sussex Safeguarding Children Partnership (WSSCP) threshold chart: https://www.westsussexscp.org.uk/wp-content/uploads/2024/02/Thresholds-on-a-page-FINAL-Feb2024.pdf

Abuse

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

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include 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.

Sexual abuse

Involves forcing, causing or inciting a child 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, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse 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 as well as offline, 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. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. There are specific offences for children under 13, who can never provide valid consent to sexual activity, and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.

Neglect may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The WSSCP neglect strategy is used to provide a more detailed summary of neglect and the local thresholds for referrals.

Indicators of abuse

Neglect

The nature of neglect

Neglect is a lack of parental care, but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on child protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment.

NSPCC research has highlighted the following examples of the neglect of children under 12:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The WSSCP neglect toolkit provides a more detailed list of indicators of neglect and is available to all staff

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional abuse

The nature of emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents.

Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Children can be harmed by witnessing someone harming another person, as in domestic violence.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse

Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour ,e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical abuse

The nature of physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. However, accidental injuries normally occur on the *bony prominences* – e.g., shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A skin map (Annex 13) can assist in the clear recording and reporting of physical abuse. The skin map must only be used to record observed injuries, and no child may be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse and factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adult words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

Sexual abuse

The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

Indicators of sexual abuse

Physical observations

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity
- Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be ‘ultra-good’ or perfect; overreacting to criticism.

Annex 9

Prevent duty

Preventing radicalisation and extremism

Staff training

Each school ensures that all staff receive annual safeguarding training, which includes specific training on preventing radicalisation and understanding the risks associated with extremist ideology. This training forms a core part of our wider safeguarding responsibilities.

Recognising vulnerability to extremism

We recognise that children can be susceptible to extremist ideology and radicalisation. Protecting children from these risks is treated with the same level of importance as protecting them from any other form of harm or abuse. Safeguarding against radicalisation is therefore embedded within our overall safeguarding approach.

Definitions

- Extremism — the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- Radicalisation — the process of a person legitimising support for, or use of, terrorist violence (as defined in the Prevent duty guidance).
- Terrorism — an action that endangers or causes serious violence to people, causes serious property damage, or seriously disrupts electronic systems, where the use or threat is intended to influence the government or intimidate the public for political, religious, or ideological purposes.

Identifying risk

There is no single indicator that a child is at risk of extremist ideology. A combination of background factors, personal vulnerabilities, and external influences (including online content, social media, peers, or family) may contribute.

Radicalisation can occur in a range of settings, including the home environment. Staff are expected to remain vigilant and alert to changes in behaviour, patterns of isolation, or expressions of extremist views that may indicate a child is in need of help or protection.

Where concerns arise, staff must act proportionately and report concerns to the Designated Safeguarding Lead (DSL) or deputy, who may consider making a Prevent referral.

Legal duty

Each school is subject to the statutory duty under section 26 of the Counter-Terrorism and Security Act 2015, requiring it to have *"due regard to the need to prevent people from being drawn into terrorism."* This is known as the Prevent duty.

Safeguarding context

The Prevent duty is part of our wider safeguarding obligations. The DSL and deputies are responsible for understanding local Prevent referral pathways and ensuring staff know how to raise concerns.

Guidance and expectations

Senior leaders and DSLs have familiarised themselves with the revised Prevent duty guidance, particularly paragraphs 57–76 relating to schools and childcare: https://www.gov.uk/government/publications/prevent-duty-guidance

The guidance is structured around four key themes:

- Risk assessment
- Working in partnership
- Staff training
- IT policies

Further information is also available from:

- Prevent duty guidance: England and Wales (2023) - GOV.UK
- Keeping Children Safe in Education 2026, Annex A (Preventing radicalisation)

Purpose of Channel

We recognise that Channel is a voluntary, confidential, multi-agency programme designed to provide early support to individuals who may be vulnerable to being drawn into terrorism.

Referral process

Prevent referrals may be considered by a Channel Panel, which assesses vulnerability and determines appropriate support. A representative from the school may be asked to attend the panel to contribute to the assessment. Information relevant to a Prevent or Channel referral should be shared with the police, as set out in KCSIE 2026 Annex A.

Engagement with Channel is entirely voluntary at every stage.

DSL responsibilities

The DSL and senior safeguarding staff understand when it is appropriate to make a Channel referral and how to follow local procedures.

Further information

- Channel and Prevent Multi-Agency Panel (PMAP) guidance - GOV.UK
- The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK
- National Prevent referral form

Additional advice and guidance can be accessed via the West Sussex Safeguarding Children Partnership: Channel - West Sussex SCP

Annex 10

Safeguarding contacts

Names and contact details are not recorded in this policy. They are held in a separate, version-controlled document, *BLLP Safeguarding Contacts*, which contains a Trust section, a section for each school and a section for external agencies. It is updated whenever a post holder or contact detail changes, without this policy being reissued. The current version is published alongside this policy and is available from each school office. References in this policy to a post holder being "named in Annex 10" are to that document.

The table below lists the posts and contacts recorded in *BLLP Safeguarding Contacts*. Only work contact details are published; personal telephone numbers are not.

Post or contact	Where recorded
Chair of Trustees	Trust section
Senior board-level lead for safeguarding (a trustee)	Trust section
CEO (Chief Executive Officer)	Trust section
Trust Safeguarding Lead	Trust section
Headteacher	School section
DSL	School section
Deputy DSL(s)	School section
School's named Prevent lead	School section
Senior mental health lead	School section
Designated teacher for looked-after children	School section
SLT lead for filtering and monitoring	School section
Nominated safeguarding governor	School section
Chair of Local Governing Body	School section
Integrated Front Door (Children's Social Care referrals)	External agencies section
Safeguarding in Education Team (West Sussex County Council)	External agencies section
Local Authority Designated Officer (LADO), including the online referral route	External agencies section
Police	External agencies section
NSPCC Whistleblowing Advice Line	External agencies section
School nurse	School section

Annex 11

Version control and table of changes

Version control

Revision	Summary
r1	Original based on WSCC Model Policy for maintained schools, adapted for BLLP as a MAT with multiple academies.

The status of the policy, the date of approval by the Trust Board and the review date are shown on the cover page. The revision, the date and the status are repeated in the footer of every page.

Annex 10 (contacts) is version controlled separately and may be updated without a new revision of this policy being issued.

Circulation to Local Governing Bodies

The policy takes effect on Trust Board approval. Local Governing Bodies do not need to adopt it. Each Local Governing Body records here the date on which it received this version.

School	Date received by the Local Governing Body	Recorded by
Bishop Luffa School		
Fishbourne CE Primary School		
Lavant CE Primary School		
Nyewood CE Infant School		
Rumboldswhyke CE Primary School		
West Dean CE Primary School		

Table of changes from the WSCC model

Throughout the document changes have been made to punctuation, grammar and readability. These have not all been highlighted in the table below, which summarises the significant changes from the WSCC Model Policy.

Section	Changes
Whole policy	Rewritten from a policy for maintained schools into a policy for a multi-academy trust: the Trust, as proprietor, holds the statutory safeguarding duty (section 157 of the Education Act 2002); references to governing bodies and to colleges removed; numbered sections, annexes and cross-references; “must”, “will”, “should” and “may” used consistently.

Section	Changes
Cover and Annex 11	Status, date of approval and review date moved to the cover page and footer; revision control and circulation to Local Governing Bodies recorded here; the policy takes effect on Trust Board approval.
Introduction and section 1.6	Policy statement, aims and a legal and statutory framework added, including the Children's Wellbeing and Schools Act 2026 and the Crime and Policing Act 2026.
Section 2	Trust-level leadership replaces single-school wording: Trust Board and Local Governing Body roles, safer recruitment with one single central record across the Trust, and written confirmation that staff have read Part one of KCSIE.
Section 2.3 and Annex 1	New single, authoritative Step-by-Step Safeguarding and Escalation Procedure, with professional challenge and external escalation; flowchart redrawn to match.
Sections 2.7 and 2.6	Confidentiality rewritten around the statutory information sharing duty; new section on the forthcoming mandatory reporting duty for child sexual abuse.
Sections 2.9 and Annex 3	Separate routes for school staff, Trust central staff, headteachers, the CEO and the Chair of Trustees (the nominated Trustee acts as case manager for an allegation against the Chair); the Trust Low-Level Concerns Policy applies in every school.
Section 3	Governing body responsibilities replaced by Trust Board and Local Governing Body responsibilities; new sections for the senior board-level lead for safeguarding (3.4) and the Trust Safeguarding Lead (3.6); DSL responsibilities revised, including cover arrangements.
Section 4	Procedures made Trust-wide; new sections on missing education and home education, child exploitation, looked-after children, domestic abuse, private fostering, children at greater risk, children questioning their gender, alternative provision, work experience, reasonable force, use of premises, and early years (Reception) provision (4.14).
Annex 2, Annex 6 and Annex 7	Adjusted for the Trust and KCSIE 2026: staff tell the DSL immediately; whistleblowing routes name the Chair of Trustees and the NSPCC Whistleblowing Advice Line; supply staff briefing aligned.
Annex 4	Retitled to cover all child-on-child abuse, including sexual violence and sexual harassment; general response section; approach to nudes and semi-nudes; police starting point for rape, assault by penetration and sexual assault; reporting routes for children.
Annex 5	Online safety obligations for the Trust and schools replace quoted guidance; artificial intelligence; filtering and monitoring review; schools mobile phone-free by default, with any variation a matter for each school's own behaviour policy.

Section	Changes
Annex 8 and Annex 9	Definitions of abuse updated to KCSIE 2026; Prevent duty annex aligned to current definitions and guidance, including sharing information with the police.
Annex 10	The model's useful contacts and key contacts annexes replaced by a list of posts; names and contact details held in a separate, version-controlled contacts document (work contact details only).
Annex 11	The model's page-based table of changes replaced by revision control, a circulation record and this table.
Annex 12 and Annex 13	Recording form and skin map retained; the form is for visitors and supply staff without access to the school's recording system.

Annex 12

Example recording form

Use this form where the school's electronic recording system is not available, for example for visitors and supply staff without system access.

Child's name:			
Date and time:			
Name and role of person raising concern:			

Details of concern (where? when? what? who? behaviours? Use child's words)

Actions taken			
Date	Person taking action	Action taken	Outcome of action

Name: Designation:

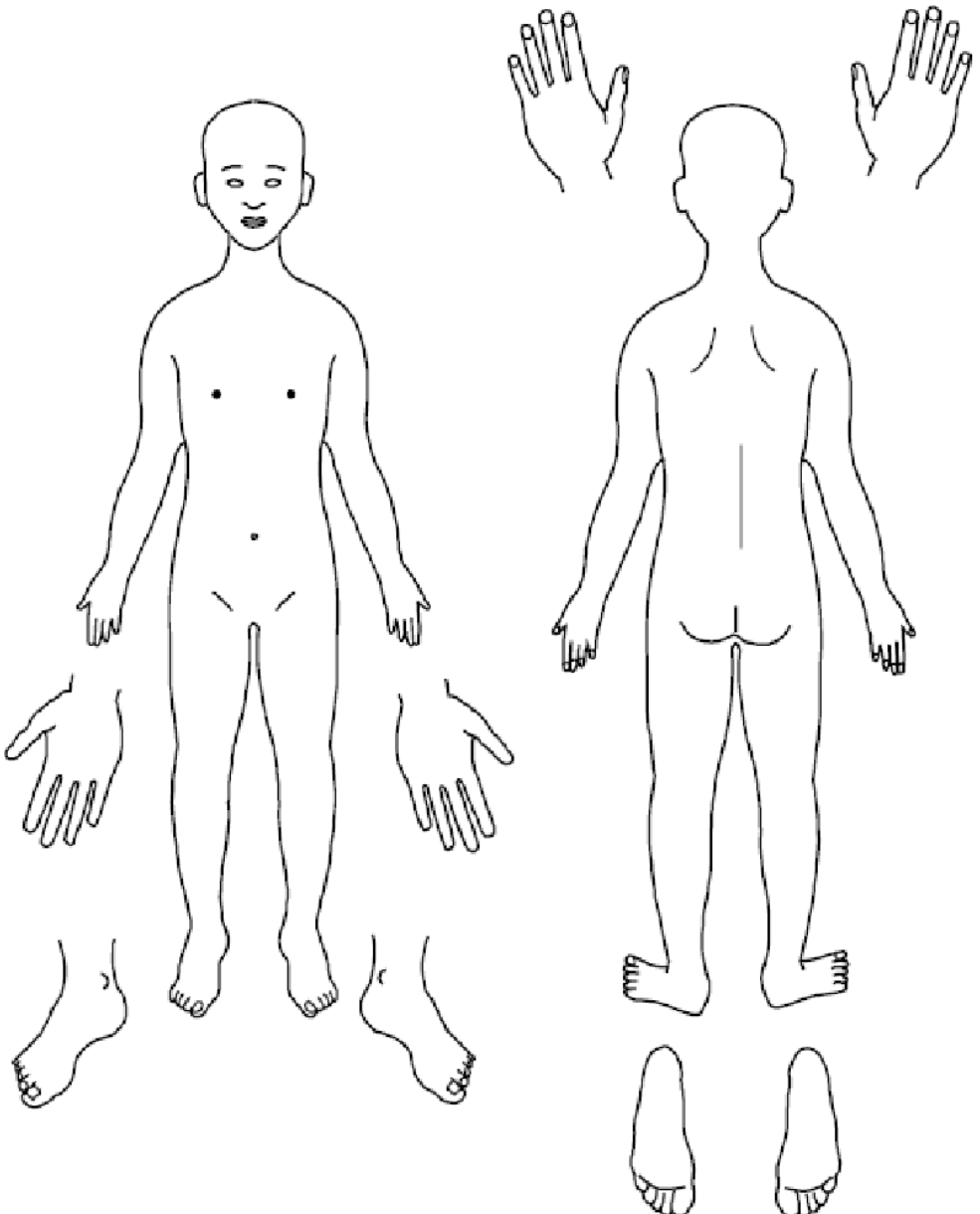
Annex 13 **Skin map**

This form records what has been observed in the ordinary course of the school day, or what a child has described. It is not authority to examine a child, and no member of staff may ask a child to remove clothing.

Name of Child: _____

Date of birth: _____ Date of recording: _____

Name of person completing: _____











Any additional information: