| Ferring CE Primary School | | |
|---|---|---|
| Policy: | **Child Protection and Safeguarding Policy** | |
| Policy date: | Autumn 2025 | |
| Review date: | Autumn 2026 | |
| Person responsible | Chair of Governors | |

**The Designated Safeguarding Lead in this school is:**

NAME: James Cox Date 6.1.25

**The Deputy Safeguarding Leads in this school are:**

NAME: Miss Jane Jones Date 1.9.24
NAME: Miss Viv Squires Date: 1.9.24

**Additional core members of the safeguarding team are:**

NAME: Melissa Seager Date: 16.9.25

**Our Designated Teacher for looked after children is:**

NAME: Jane Jones Date 1.9.24

**Our school/college has an Emotional Well-being Lead**

NAME: Jane Jones Date: 1.9.24

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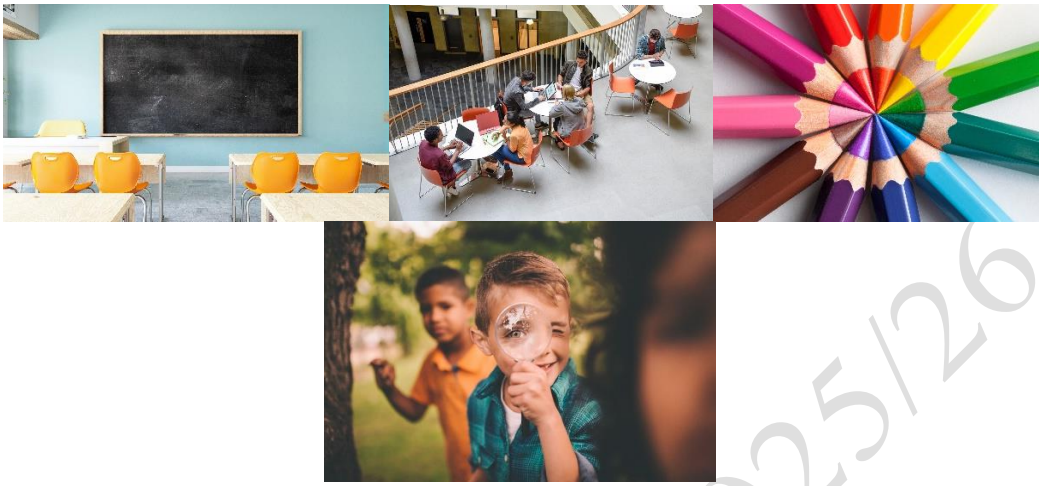
# ***Child Protection Policy***
# Procedure and Guidance



Schools and Education

Published September 2025
Review due September 2026

*Please note that this is a template – please adapt as you see fit and ensure each section is contextualised for your setting. This has been created following guidance in KCSiE 2025 and Working Together to Safeguard Children 2023. Delete this note on completion*

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# *Ferring CE Primary School* Child Protection Policy

**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 – Statutory guidance for schools colleges (KCSiE)**

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 and governors with the framework they need in order to keep children safe and secure in our school, and to inform parents and guardians how we will safeguard their children whilst they are in our care.
Specific guidance is available to staff within the procedure documents.

## 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 the school, full time or part time, in either a paid or voluntary capacity. This also includes parents and governors.

***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 will extend 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 within the procedure document.

**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 school.
- To demonstrate our commitment to protecting children.

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## 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 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.

## 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.
In this school, any individual can contact the Designated Safeguarding Lead (DSL) or their Deputy (DDSL) if they have concerns about a child or young person.
The **DSL** is ***James Cox (Headteacher)*** and the **DDSL *Vivienne Squires* (Assistant Headteacher) & Jane Jones (SENDco)*.** There is a nominated safeguarding governor, ***Melissa Seager (Parent Governor)*** , who will take leadership responsibility for safeguarding. The Chair of Governors ***Dawn Kennett*** will receive reports of allegations against the headteacher and act on the behalf of the governing body.

As an employer we follow safer recruitment guidance as set out in KCSiE 2025 including informing shortlisted candidates that online searches will be carried out.

## Training

All staff in our school are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. Training is provided at induction and updated at least annually through whole-school safeguarding and child protection training, with regular updates provided throughout the year (e.g. in staff meetings, briefings, or by email) to ensure knowledge remains current. Separate safeguarding training is provided to all new staff on appointment as part of their induction programme before they begin working with children, and this includes training on the school's safeguarding policy, the role of the DSL, Part One of KCSiE, and how to report concerns. The DSL will attend formal training at least every two years to enable them to fulfil their role, and will also access additional training, updates, and supervision as required to maintain knowledge and skills. 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. Governor training is provided as required by KCSiE 2025, with safeguarding training undertaken at

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induction and refreshed regularly to ensure that all governors understand their strategic safeguarding responsibilities.

### 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 will contact Children's Social Care and, if appropriate, the police. If the DSL or DDSL is not available or there are immediate concerns, the staff member will refer directly to Children's Social Care and the police if appropriate. We will use the guidance from 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 will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.*

### Confidentiality

- We maintain that all matters relating to child protection are to be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2024) guidance
- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- Information will be shared with individuals within the school who 'need to know'.
- All staff are aware that they cannot promise a child to keep a disclosure confidential.

### As a school we 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 on-line
- **PSHE and RSE curriculum**: Embedding safeguarding themes such as healthy relationships, consent, recognising unsafe situations, and where to seek help, in line with statutory Relationships and Sex Education (RSE).
- **Whole-school Collective Worship and themed weeks**: Using age-appropriate resources (e.g. NSPCC "Speak out. Stay safe.") and national campaigns (e.g. Anti-Bullying Week, Safer Internet Day) to reinforce messages.
- **Use of pupil voice**: Providing regular opportunities for children to express views and raise concerns through school councils, 'ask it basket', suggestion schemes, or anonymous reporting tools.

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- **Practical safeguarding tools**: Introducing simple systems such as “worry monsters,” “feelings check-ins,” or traffic-light self-assessments that help children communicate emotions and concerns.
- **Peer support and mentoring**: Establishing buddy systems or playground leaders so children feel supported by peers as well as adults.
- **Visual and accessible safeguarding information**: Displaying child-friendly posters around school (including photos of DSLs and safeguarding team members), ensuring children know who to approach for help.
- **Tailored safeguarding education for vulnerable groups**: For example, additional small-group sessions for children with SEND, EAL learners, or those at greater risk, ensuring materials are accessible and inclusive.
- **Collaboration with external agencies**: Inviting trained professionals (e.g. police community support officers, health visitors, or charities) to deliver workshops on safety, online risks, and resilience.
- **Parental engagement**: Providing information sessions, newsletters, and resources to help parents reinforce safeguarding messages at home.

**Dealing with concerns and allegations against staff**

If a concern is raised about the practice or behaviour of a member of staff, this information will be recorded and passed to the headteacher **Mr James Cox**. The headteacher 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 for all allegations and the relevant guidance will be followed. If the headteacher needs advice or guidance they will contact the LADO. If the allegation is against the headteacher, the person receiving the allegation will contact the LADO or Chair of Governors directly. (Annex 5)

**Dealing with children abusing children**

If a concern is raised that a child under 18 is abusing another child under 18, the ‘Child on Child Abuse’ guidance will be followed (Annex 6)

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**Legal context**

Section 175 of the education act 2002; the Education (Independent School Standards) Regulations 2014; the Non-Maintained Special Schools (England) Regulations
Children Act 2004 & 1989

Guidance
West Sussex Safeguarding Children Partnership protocols and guidance and their procedures
Working Together to Safeguard Children (2023)
Keeping children safe in education - GOV.UK (www.gov.uk)
FGM Act 2003 Mandatory Reporting Guidance (2016)

## Policy review

As a school, we review this policy at least annually in line with DfE, WSSCP and WSCC requirements and other relevant statutory guidance.

**Date approved by governing body:** *27th November 2025*

**Date reviewed by governing body:** *September 2026*

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## Roles and responsibilities within *Ferring CE Primary School*

**Staff responsibilities**

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

- 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.
- 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 as soon as practicable that day. If the DSL is not contactable immediately a DDSL should be informed.
- Be prepared to refer directly to social care, and the police if appropriate, if there is a risk of significant harm and the DSL or DDSL is not available.
- Follow the allegations procedures (Annex 5) 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 pupils in line with their child protection plan.
- Treat information with confidentiality but never promise to "keep a secret".
- Notify the DSL or DDSL of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an understanding of 'Early 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 DDSL 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.

**Senior Management Team responsibilities**:

- Contribute to inter-agency working in line with 'Working Together to Safeguard Children 2023 guidance'
- Provide a co-ordinated offer of early help when additional needs of children are identified

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- Ensure staff are alert to the various factors that can increase the need for early help (*para 18 KCSiE 2024*)
- 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 governing body such as training of staff, safer recruitment and maintaining a single central register.
- 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 if a concern about a member of staff is a 'low level concern' or an allegation[1]

**Governing body responsibilities**

- Ensure the school has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- Ensure WSSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding self assessment.
- Recruitment, selection and induction follows safer recruitment practice, including all appropriate checks.
- Allegations against staff are dealt with by the headteacher. Allegations against the headteacher are dealt with by the Chair of Governors.
- 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
- A nominated governor for safeguarding is identified.

**DSL responsibilities** *(to be read in conjunction with DSL role description in KCSiE)*
**In this school the DSL is *James Cox (Headteacher)***
**The Deputy DSLs are *Vivienne Squires* (Assistant Headteacher) & Jane Jones (SENDco)**

In addition to the role of all staff and the senior management team, the DSL will

- 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 Governing Body in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

[1] See Keeping Children Safe in Education 2025 Part 4 section 1 paragraph 359



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- 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 the Deputy 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 accordingly (separate from pupil files) and in a timely fashion when a child transfers school, including in-year transfers.
- 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 2025

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# *Ferring CE Primary School* Child Protection Procedures

**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 they have a disclosure of abuse made to them they must:**

1. Make an initial record of the information

2. Report it to the DSL immediately

3. The DSL will consider if there is a requirement for immediate medical intervention. Urgent medical attention should not be delayed if the DSL is not immediately available

4. Make an accurate record (which may be used in any subsequent judicial proceedings) as soon as possible and within 24 hours of the occurrence. Include everything that has happened, including details of:

    - Dates and times of observations
    - Dates and times of any discussions in which they were involved
    - Any injuries
    - Explanations given by the child / adult
    - What action was taken
    - Any actual words or phrases used by the child

    The records must be signed and dated by the author with an equivalent procedure in place for electronic based records

5. In the absence of the DSL or their Deputy, be prepared to refer directly to Children's Social Care (and the police if appropriate) if there is the potential for immediate, significant harm.

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**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.

   If there is indication that the child is suffering significant harm, a call will also be made to Integrated Front Door on 01403 229900

4. 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.

5. 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 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.

6. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider the Early Help process.

7. In cases of allegations against staff or low level concerns, the WSSCP procedure or the school Low Level Concerns (LLC) procedure will be followed.

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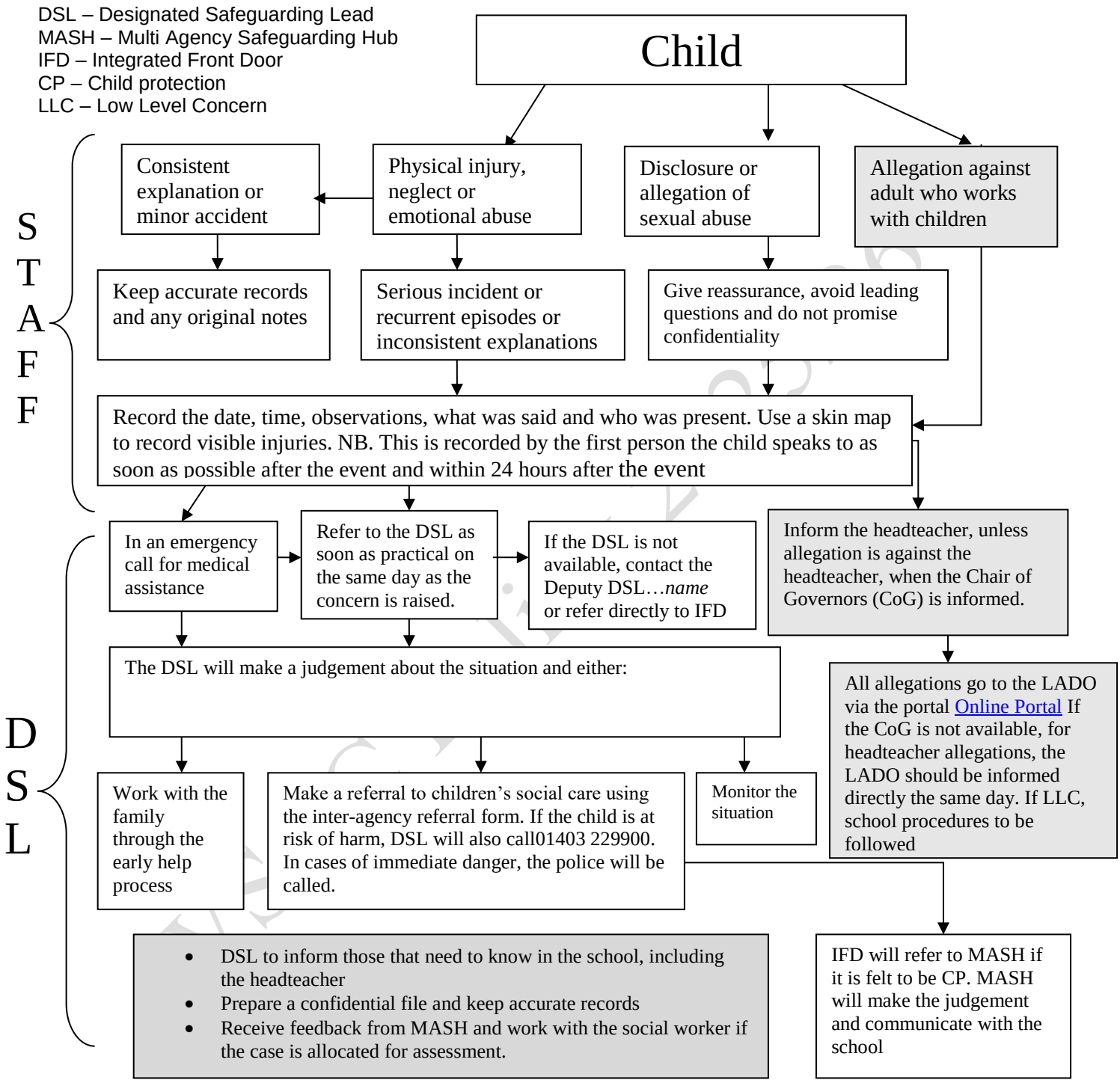
## *Annex 1 - Flowchart for child protection procedures*




***** *In the cases of known FGM, the teacher who was made aware will also make contact with the police*

***Annex 2 - Example Recording form*** *that must be uploaded onto CPOMS if used*

| | | | |
|---|---|---|---|
| **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:**

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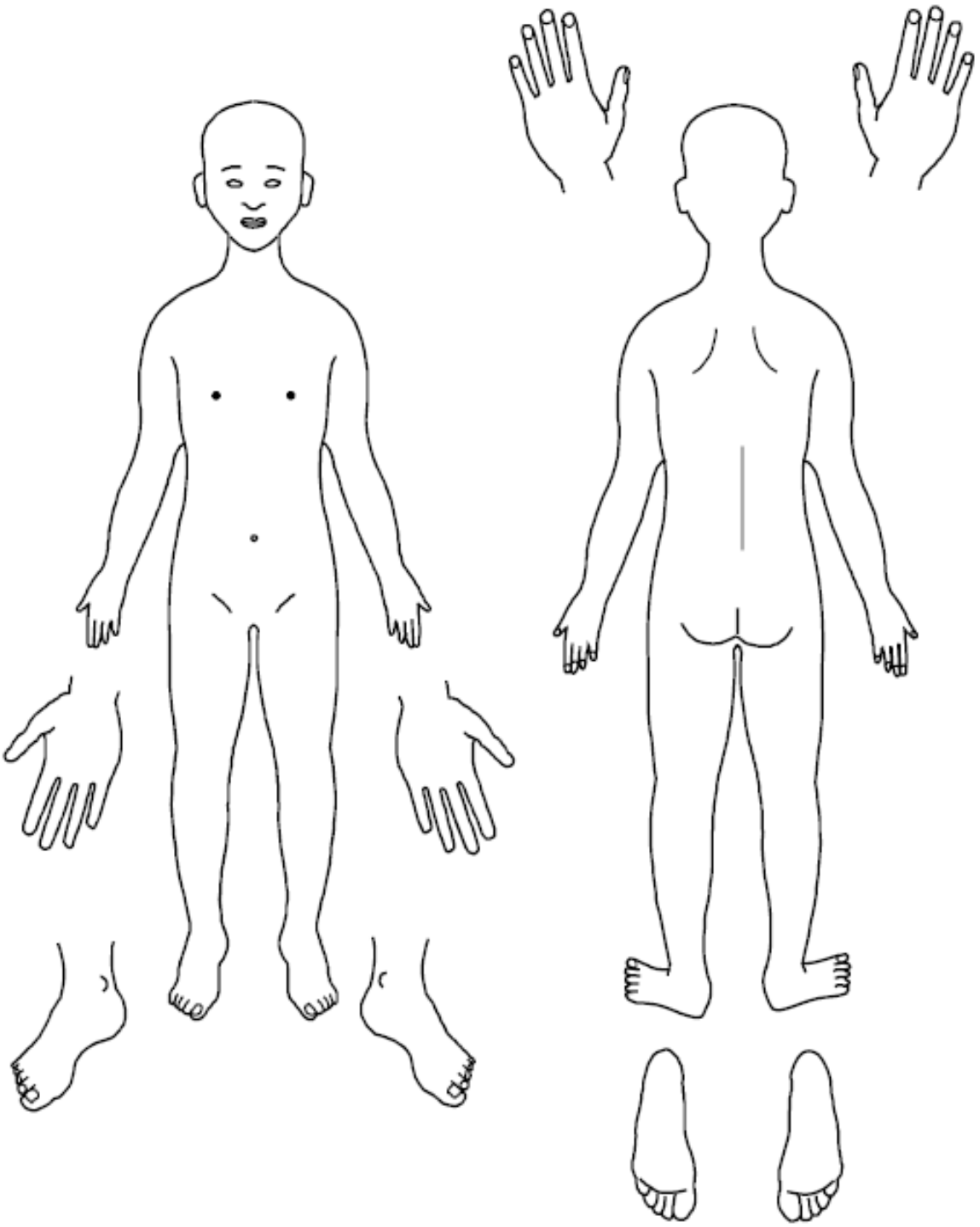
***Annex 3 - Skin map*** *that must be uploaded onto CPOMS if used*



Name of Child: _____

Date of birth: _____ Date of recording: _____

Name of person completing: _____

Any additional information:

## *Annex 4 - Dealing with disclosures*

### All staff should

A members of staff who are approached by a child should maintain a positive attitude and try to reassure them. They should 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 should 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 should do this if, 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 R's

### 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 as soon as possible
- If you are not able to contact your DSL or the Deputy, and the child is at risk of immediate harm, contact the children's services social care department 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 body map 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 abuse, 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, then the Whistleblowing procedures of the school should be followed. 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 5 - Allegations against adults who work with children*

There is now a requirement to produce a Lower Level Concern (LLC) policy and process to be set out in your existing Codes of Conduct/Safeguarding Policy.
Working Together to Safeguard Children (2023) states that organisations should have clear policies for dealing with allegations against people who work with children. Those policies should make a clear distinction between an allegation, a complaint or a concern about the quality of care or practice.

Allegations as defined by KCSiE should be reported to the LADO. Complaints or concerns can be managed independently by the school or college 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.

Lower Level Concerns LLC's , which do not reach the allegations harm threshold (or complaints criteria) should be dealt with under a school LLC procedure.

**Procedure for Allegations that meet the harm threshold.**

This procedure should be used in all cases when it is alleged a member of staff, supply staff, volunteer, 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 criteria above) the LADOs 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.

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In line with our referral process:

- Staff will report any concerns about the conduct of any member of staff, supply staff or volunteer to the headteacher as soon as possible.
- If an allegation is made against the headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.
- There may be situations when the headteacher or Chair of Governors 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 headteacher or Chair of Governors, they will contact the LADO via the portal Online Portal or 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' (2025) 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.

**Lower Level Concerns (LLCs)**

| Ferring CE Primary School | | |
|---|---|---|
| Policy: | **Low Level Concerns Policy** | |
| Policy date: | Autumn 2025 | |
| Review date: | Autumn 2026 | |
| Person responsible | Headteacher | |

**Rationale**

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This policy should be read in conjunction with Ferring CE School's Safeguarding Policy and Procedures, Staff Code of Conduct and Whistleblowing Policy, to enable staff to share their concerns, no matter how small, about their own or another member of staff's behaviour.

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the school's Code of Conduct are constantly lived, monitored and reinforced by all staff. The school deals with all concerns about adults working in or behalf of the school appropriately and promptly.

The school seeks to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below expected professional standards.

**This policy seeks to:**

• ensure that staff are clear about, and confident to distinguish between, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the blurring of professional boundaries and reporting lines
• empower staff to share any low-level concerns with the Headteacher
• help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage
• identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO
• provide for responsive, sensitive and proportionate handling of such concerns when they are raised
• help identify any weaknesses in the organisation's safeguarding system.

This policy applies to all staff at Ferring CE School.

**Defining a Low-Level Concern**

A low-level concern is one that does not meet the harm threshold as stated in the school's Safeguarding Policy. That is, when anyone working in a school (including volunteers, supply staff and contractors) has:
• behaved in a way that has harmed a child, or may have harmed a child and/or;
• possibly committed a criminal offence against or related to a child and/or;
• behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
• behaved or may have behaved in a way that indicates they may not be suitable to work with children (which includes behaviour that may have happened outside school posing a transferable risk to children).

Responses and actions to behaviours that may meet the harm threshold are contained specifically within the School's Safeguarding Policy, 'Allegations Regarding Staff (or volunteers)'. These should be reported to the Headteacher without delay.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' (i.e. they believe it could be a concern) – that an adult working in or on behalf of the school may have acted in a way that:
• is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
• does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:
• being over friendly with children;
• having favourites;
• taking photographs of children on their mobile phone;

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• 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.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

**Responsibilities of staff**

It is important that all staff are clear of the expectations the school stipulates from them as contained in the Staff Code of Conduct. This is covered annually by the Designated Safeguarding Lead, and as part of the school's induction for new staff.

It is crucial that any concerns in relation to a staff member's behaviour, including those which do not meet the harm threshold, are shared responsibly and with the Headteacher. This should be done without delay.

Where there are concerns/allegations about the Headteacher, this should be referred to the Chair of Governors.

Staff members who are concerned about how their behaviour may have been interpreted, or, on reflection, re-evaluate their behaviour as one that may have been in contrary to the school's code of conduct and expectations, they self-refer to the Headteacher.

**Dealing with Low-Level Concerns**

All low-level concerns may be shared verbally with the Headteacher in the first instance, but must then be recorded in writing.

The record should include:
• details of the concern
• the context in which the concern arose
• action taken

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Where the low-level concern is provided verbally, the Headteacher should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above. Records will be signed, timed and dated.
Records will remain confidential in accordance with the school's Data Protection policies and GDPR.

**Responding to a Low-Level Concern**

The Headteacher will in the first instance satisfy themselves that it is a low-level concern and should not be reclassified as a higher level concern/allegation and dealt with under the appropriate procedure below.

The circumstances in which a low-level concern might be reclassified are where:
(a) the threshold is met for a higher-level concern/allegation
(b) there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
(c) there is other information which when taken into account leads to a higher-level concern/allegation.

Where the Headteacher is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a 'no-names' basis.

Having established that the concern is low-level, the Headteacher will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the concern has

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been raised via a third party, the Headteacher should collect as much evidence as possible by speaking:
• directly to the person who raised the concern, unless it has been raised anonymously;
• to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Details of the concern will be recorded along with the rationale for decisions and action taken.

Any conversation with a member of staff following a concern will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may be required. Some concerns may trigger the school's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate. Some concerns may be related to performance management and advice may be sought from the school's HR providers.

**Monitoring of Low-Level Concerns**

The Headteacher will securely retain confidential files on low-level concerns. A central log will be shared and monitored by the school's Senior Leadership Team on a monthly basis to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record will be kept of this review within SLT Minutes.

No record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:
(a) the concern (or group of concerns) has been reclassified as a higher-level concern, or
(b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

**Further References**

Farrer & Co – Developing and implementing a low-level concerns policy: a guide for organisations which work with children – Adele Eastman, Jane Foster, Owen O'Rorke and David Smellie. 2020

https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concernsguidance-2020.pd

Department for Education, Keeping Children Safe in Education 202
https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2025.pdf

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Working together to Safeguard Children.

Statutory guidance on inter-agency working to safeguard and promote the welfare of children.

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https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

***Appendix 1: Low-Level Concern Form - Template***

| |
|---|
| **CONFIDENTIAL ONCE COMPLETED**<br><br>**[Name Of School] LOW-LEVEL CONCERN FORM** |
| Your Name |
| Your Role |
| Date and time form was completed |
| **DETAILS OF INDIVIDUAL WHOM THE CONCERN IS ABOUT** (or yourself if self-reporting) |
| Their Name |
| Their Role |
| Your relationship to the individual at the school (e.g., manager, colleague) |
| **DETAILS OF LOW-LEVEL CONCERN** |
| Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our school's [Enter details here e.g., Staff Code of Conduct]? |
| **DETAILS OF ANY CHILDREN INVOLVED** |
| Their name(s) |
| **FOR USE BY HEADTEACHER ONLY [or alternative]** |
| Date and time low-level concern form received |
| Signature |
| Role |
| Actions to be taken and follow-up notes |

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**CONFIDENTIAL ONCE COMPLETED**

**Note:** This record will be held securely in accordance with the school's Low-Level Concerns Policy. Low-level concerns will be treated in confidence as far as possible, but the school may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

END OF LOW-LEVEL CONCERN FORM CREATED BY KMG SHRS 19/08/2022 AND FINALISED 02/12/2022

The LLC 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 or College 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 independently by the school or college under internal procedures.
Examples of LLCs include, but is 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 or colleges 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.**

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## *Annex 6 - Sexual violence and sexual harassment between children in schools and colleges*

**Child on child – Model Policy.**

### Context

This policy is about how staff should respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of school or college premises, and or online. All staff are advised to maintain an attitude of "It could happen here"

Schools and colleges 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 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

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and by other children.

We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE (2025)

This policy is underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

We will minimise the risk of child-on-child abuse by: -

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**Prevention:**

- 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 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 our 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 as soon as practicably possible but at least within 24 hours.
- 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 (01403 229900).

**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.

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- 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.

**Options: The DSL will manage the report with the following options: -**

- Manage internally
- Refer to Early Help
- Refer to Children's Social Care
- Report to the police (generally in parallel with a referral to Social Care)

**Ongoing Response:**

- **All** concerns, discussions and decisions made, and the reasons for those decisions, should 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 same school or college would seriously harm the education or welfare of the victim (and potentially other pupils and students).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, 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 and college 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.

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- 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 or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own 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.

References: –
KCSiE (DfE 2025)

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## *Annex 7 - Online Safety and Artificial Intelligence (AI)*

As a school it is essential that we safeguard children from potentially harmful and inappropriate online material.

A comprehensive approach to online safety empowers staff to protect and educate pupils, students, and colleagues in their use of technology and

establishes the following 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, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

- **contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

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

There should be appropriate filtering and monitoring in place on all school devices and school networks. That staff training should include understanding roles and responsibilities in relation to filtering and monitoring. To support schools with this the DfE have produced the following guidance: Appropriate Filtering and Monitoring - UK Safer Internet Centre

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the National Education Network. In addition, schools and colleges should consider meeting the Cyber security standards for schools and colleges.GOV.UK. Broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff - NCSC.GOV.UK

We 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.

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The Online Safety Act 2023 (the Act) is a new set of laws that protects children and adults online. It puts a range of new duties on social media companies and search services, making them more responsible for their users' safety on their platforms. The Act will give providers new duties to implement systems and processes to reduce risks their services are used for illegal activity, and to take down illegal content when it does appear.
Online Safety Act: explainer - GOV.UK

**Artificial Intelligence (AI)**

The Department has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education

Generative AI: product safety expectations - GOV.UK

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

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## *Annex 8 - Whistleblowing*

**Whistleblowing in a safeguarding context**

Every school should have a whistleblowing procedure. Whistleblowing procedures protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

This does not replace the whistleblowing policy and should be read in conjunction with the school 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.

Within Ferring CE Primary School, the *headteacher James Cox* is the senior manager and responsible for all staff. If you are concerned that any member of staff within the school is not following safeguarding processes or behaving in a way that is placing children at risk, you should make the headteacher aware.

If your concern is about the headteacher, you should raise this with the Chair of Governors by [process to contact CoG or equivalent]

If you would prefer to raise your concerns outside the school environment you can contact Children's Social Care by calling 01403 229900 Local Authority Designated Officer via Online Portal

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## *Annex 9 - Briefing sheet for temporary and supply staff*

**For supply staff and those on short contracts in *Ferring CE Primary* School**

While working in *Ferring CE Primary* 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), who is *James Cox (Headteacher)* and can be found *in person at Ferring CE Primary School, Sealane, Ferring, West Sussex, BN12 5DU or contacted by telephone on 01903 243945 or emailed via office@ferring.w-sussex.sch.uk.*

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 write down what you saw or heard, date and sign your account, and give it to the DSL as soon as possible and no longer than 24 hours later. 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 should follow due process, including contacting Children's Social Care if appropriate.

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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, in T:\Policies.

If your concern involves the DSL or a member of the senior staff, inform the head teacher and consider/discuss contacting the LADO via the Online Portal
**Remember, if you have a concern, report it.**

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## *Annex 10 - What is child abuse?*

The following definitions are taken from W*orking Together to Safeguard Children* HM Government (2023) 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

**What is abuse and neglect?**
Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

**Physical abuse**
Physical abuse 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 persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse**
Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually

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inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect**
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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

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- 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

**<u>Emotional abuse</u>**

**The nature of emotional abuse**

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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

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- 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 body map (annex 3*)* can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries, and no child should be asked to remove clothing by a member of staff of the school.

**Indicators of physical abuse / 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

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- 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

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- 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.

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## *Annex 11 - Useful contacts*

| Key Personnel | Name (s) | Telephone No. |
|---|---|---|
| DSL | James Cox (Headteacher) | 01903 243945 |
| Deputy DSL(s) | Vivienne Squires (Assistant Headteacher)<br>&<br>Jane Jones (SENDco) | 01903 243945 |
| School's named Prevent lead | Vivienne Squires (Assistant Headteacher) | 01903 243945 |
| Schools Mental Health Lead | Jane Jones (SENDco) | 01903 243945 |
| Nominated Safeguarding Governor | Melissa Seager (Parent Governor) | 01903 243945 |
| Chair of Governors | Dawn Kennett | 01903 243945 |
| Integrated Front Door | | 01403 229900 |
| Safeguarding in Education Team | Sally Arbuckle (Manager)<br>Gabby Rodrigues<br>Natasha Cherryman<br>Sarah Young | 0330 222 4030<br>Safeguarding.education@westsussex.gov.uk |
| Police | | 101 or in emergencies 999 |
| Safeguarding advisors / Local Authority Designated Officers (LADOs) | Miriam Williams<br>Donna Tomlinson<br>Vic Williams | Online Portal |
| School nurse | | |

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| Ferring CE Primary School | |
|---|---|
| Policy: | **Child Protection and Safeguarding Policy** |
| Policy date: | Autumn 2026 |
| Review date: | Autumn 2027 |
| Person responsible | Chair of Governors |

**The Designated Safeguarding Lead in this school is:**

NAME: Miss Viv Squires

*NB: Mr James Cox will deputise between September 1st and October 11th due to a training need for Miss Viv Squires following a postponement*

**The Deputy Safeguarding Leads in this school are:**

NAME: Mr James Cox

**Additional core members of the safeguarding team are:**

NAME: David Munro

**Our Designated Teacher for looked after children is:**

NAME: Mrs Coral Cox

**Our school/college has an Emotional Well-being Lead**

NAME: Anna Todorova

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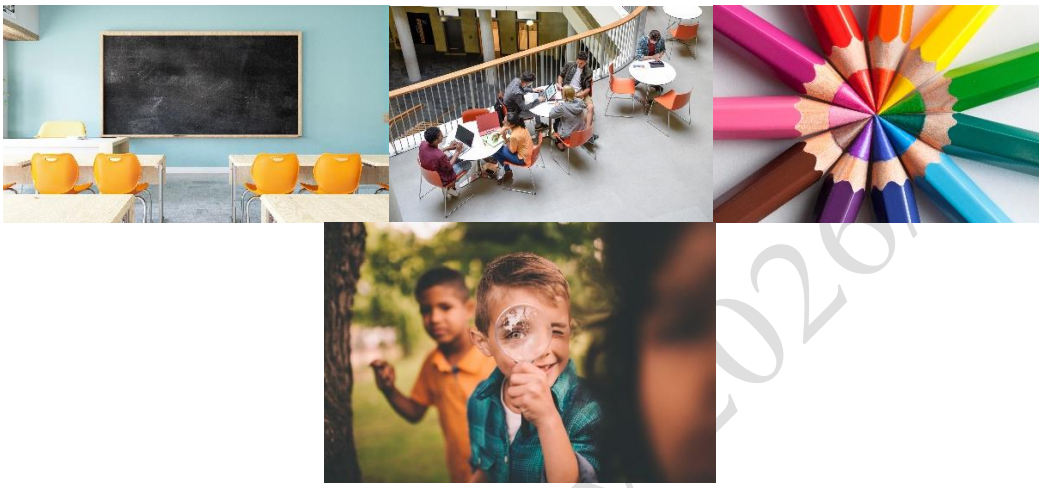
# *DRAFT – 2026/27*

# *Child Protection and Safeguarding Policy*

## Procedure and Guidance



Schools and Education

Published September 2026
Review due September 2027

*Please note that this is a template – please adapt as you see fit and ensure each section is contextualised for your setting. This has been created following guidance in KCSiE 2026 and Working Together to Safeguard Children 2023. Delete this note on completion*

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# *Ferring CE Primary School* Child Protection Policy

**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 – Statutory guidance for schools colleges (KCSiE)**

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 and governors with the framework they need in order to keep children safe and secure in our school, and to inform parents and guardians how we will safeguard their children whilst they are in our care.
Specific guidance is available to staff within the procedure documents.

## 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 the school, full time or part time, in either a paid or voluntary capacity. This also includes parents and governors.

***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 will extend 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 within the procedure document.

**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 school.
- To demonstrate our commitment to protecting children.

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## 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 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.

## 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.
In this school, any individual can contact the Designated Safeguarding Lead (DSL) or their Deputy (DDSL) if they have concerns about a child or young person.
The **DSL** is ***Viv Squires*** and the **DDSL** is ***James Cox.*** There is a nominated safeguarding governor, ***David Munro*** , who will take leadership responsibility for safeguarding. The Chair of Governors ***Dawn Kennett*** will receive reports of allegations against the headteacher and act on the behalf of the governing body.

As an employer we follow safer recruitment guidance as set out in KCSiE 2026 including informing shortlisted candidates that online searches will be carried out.

## Training

All staff in our school are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. Training is provided at induction and updated at least annually through whole-school safeguarding and child protection training, with regular updates provided throughout the year (e.g. in staff meetings, briefings, or by email) to ensure knowledge remains current. Separate safeguarding training is provided to all new staff on appointment as part of their induction programme before they begin working with children, and this includes training on the school's safeguarding policy, the role of the DSL, Part One of KCSiE, and how to report concerns. The DSL will attend formal training at least every two years to enable them to fulfil their role, and will also access additional training, updates, and supervision as required to maintain knowledge and skills. 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. Governor training is provided as required by KCSiE 2025, with safeguarding training undertaken at induction and refreshed regularly to ensure that all governors understand their strategic safeguarding responsibilities.

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## 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 will contact Children's Social Care and, if appropriate, the police. If the DSL or DDSL is not available or there are immediate concerns, the staff member will refer directly to Children's Social Care and the police if appropriate. We will use the guidance from 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 will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.*

## Confidentiality

- We maintain that all matters relating to child protection are to be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2024) guidance
- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- Information will be shared with individuals within the school who 'need to know'.
- All staff are aware that they cannot promise a child to keep a disclosure confidential.

## As a school we 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 on-line


- 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 on-line

- **PSHE and RSE curriculum**: Embedding safeguarding themes such as healthy relationships, consent, recognising unsafe situations, and where to seek help, in line with statutory Relationships and Sex Education (RSE).

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- **Whole-school Collective Worship and themed weeks**: Using age-appropriate resources (e.g. NSPCC “Speak out. Stay safe.”) and national campaigns (e.g. Anti-Bullying Week, Safer Internet Day) to reinforce messages.
- **Use of pupil voice**: Providing regular opportunities for children to express views and raise concerns through school councils, ‘ask it basket’, suggestion schemes, or anonymous reporting tools.
- **Practical safeguarding tools**: Introducing simple systems such as “worry monsters,” “feelings check-ins,” or traffic-light self-assessments that help children communicate emotions and concerns.
- **Peer support and mentoring**: Establishing buddy systems or playground leaders so children feel supported by peers as well as adults.
- **Visual and accessible safeguarding information**: Displaying child-friendly posters around school (including photos of DSLs and safeguarding team members), ensuring children know who to approach for help.
- **Tailored safeguarding education for vulnerable groups**: For example, additional small-group sessions for children with SEND, EAL learners, or those at greater risk, ensuring materials are accessible and inclusive.
- **Collaboration with external agencies**: Inviting trained professionals (e.g. police community support officers, health visitors, or charities) to deliver workshops on safety, online risks, and resilience.
- **Parental engagement**: Providing information sessions, newsletters, and resources to help parents reinforce safeguarding messages at home.

**Dealing with concerns and allegations against staff**

If a concern is raised about the practice or behaviour of a member of staff, this information will be recorded and passed to the headteacher **James Cox**. The headteacher 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 for all allegations and the relevant guidance will be followed. If the headteacher needs advice or guidance they will contact the LADO. If the allegation is against the headteacher, the person receiving the allegation will contact the LADO or Chair of Governors directly. (Annex 3)

**Dealing with children abusing children**

If a concern is raised that a child under 18 is abusing another child under 18, the ‘Child on Child Abuse’ guidance will be followed (Annex 4)

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**Legal context**

Section 175 of the education act 2002; the Education (Independent School Standards) Regulations 2014; the Non-Maintained Special Schools (England) Regulations
Children Act 2004 & 1989

Guidance
West Sussex Safeguarding Children Partnership protocols and guidance and their procedures
Working Together to Safeguard Children (2023)
Keeping children safe in education - GOV.UK (www.gov.uk)
FGM Act 2003 Mandatory Reporting Guidance (2016)

## Policy review

As a school, we review this policy at least annually in line with DfE, WSSCP and WSCC requirements and other relevant statutory guidance.

**Date approved by governing body:** *26th November 2026*

**Date reviewed by governing body:** *September 2027*

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## Roles and responsibilities within *Ferring CE Primary School*

**Staff responsibilities**

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

- 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.
- 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 as soon as practicable that day. If the DSL is not contactable immediately a DDSL should be informed.
- Be prepared to refer directly to social care, and the police if appropriate, if there is a risk of significant harm and the DSL or DDSL is not available.
- Follow the allegations procedures (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 pupils in line with their child protection plan.
- Treat information with confidentiality but never promise to "keep a secret".
- Notify the DSL or DDSL of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an understanding of 'Early 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 DDSL 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.

**Senior Management Team responsibilities**:

- Contribute to inter-agency working in line with 'Working Together to Safeguard Children 2023 guidance'
- Provide a co-ordinated offer of early help when additional needs of children are identified

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- Ensure staff are alert to the various factors that can increase the need for early help (*para 18 KCSiE 2024*)
- 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 governing body such as training of staff, safer recruitment and maintaining a single central register.
- 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 if a concern about a member of staff is a 'low level concern' or an allegation[2]

**Governing body responsibilities**

- Ensure the school has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- Ensure WSSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding self assessment.
- Recruitment, selection and induction follows safer recruitment practice, including all appropriate checks.
- Allegations against staff are dealt with by the headteacher. Allegations against the headteacher are dealt with by the Chair of Governors.
- 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
- A nominated governor for safeguarding is identified.

**DSL responsibilities** *(to be read in conjunction with DSL role description in KCSiE)*
**In this school the DSL is *Viv Squires***
**The Deputy DSLs is *James Cox***

In addition to the role of all staff and the senior management team, the DSL will

- 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 Governing Body in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.
- Attend appropriate training and demonstrate evidence of continuing professional development to carry out the role.

[2] See Keeping Children Safe in Education 2026 Part 4 section 1 paragraph 428

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- Assist the Governing Body in fulfilling their safeguarding responsibilities 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 the Deputy 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 accordingly (separate from pupil files) and in a timely fashion when a child transfers school, including in-year transfers.
- 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 2025

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# *Ferring CE Primary School* Child Protection Procedures

**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 they have a disclosure of abuse made to them they must:**

6. Make an initial record of the information

7. Report it to the DSL immediately

8. The DSL will consider if there is a requirement for immediate medical intervention. Urgent medical attention should not be delayed if the DSL is not immediately available

9. Make an accurate record (which may be used in any subsequent judicial proceedings) as soon as possible and within 24 hours of the occurrence. Include everything that has happened, including details of:

    - Dates and times of observations
    - Dates and times of any discussions in which they were involved
    - Any injuries
    - Explanations given by the child / adult
    - What action was taken
    - Any actual words or phrases used by the child

    The records must be signed and dated by the author with an equivalent procedure in place for electronic based records

10. In the absence of the DSL or their Deputy, be prepared to refer directly to Children's Social Care (and the police if appropriate) if there is the potential for immediate, significant harm.

WSCC Policy 2026/27

**Following a report of concerns the DSL must:**

8. 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
9. 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.

10. 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.

If there is indication that the child is suffering significant harm, a call will also be made to Integrated Front Door on 01403 229900

11. 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.

12. 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 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.

13. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider the Early Help process.

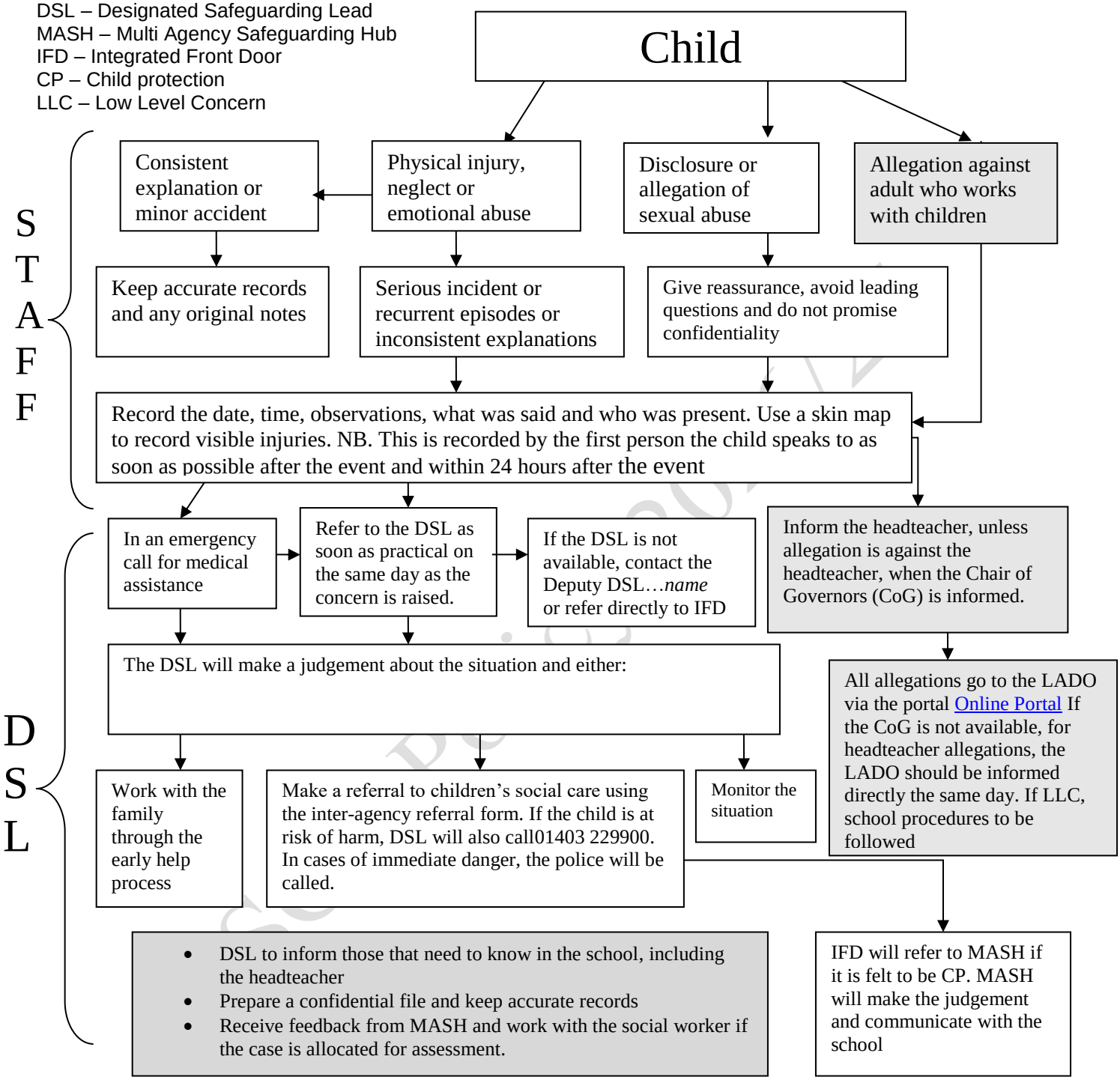
14. In cases of allegations against staff or low-level concerns, the WSSCP procedure or the school Low Level Concerns (LLC) procedure will be followed.

15. See end of policy for Dislosure form and Skin Map (Appendices 1 & 2)

WSCC Policy 2026/27

## *Annex 1 - Flowchart for child protection procedures*

DSL – Designated Safeguarding Lead
MASH – Multi Agency Safeguarding Hub
IFD – Integrated Front Door
CP – Child protection
LLC – Low Level Concern




***** *In the cases of known FGM, the teacher who was made aware will also make contact with the police*

## ***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 should 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 should 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 should do this if, 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 R's

### 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 as soon as possible
- If you are not able to contact your DSL or the Deputy, and the child is at risk of immediate harm, contact the children's services social care department 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 body map 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 abuse, 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, then the Whistleblowing procedures of the school should be followed. 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*

There is now a requirement to produce a Low-Level Concern (LLC) policy and process to be set out in your existing Codes of Conduct/Safeguarding Policy.
Working Together to Safeguard Children (2023) states that organisations should have clear policies for dealing with allegations against people who work with children. Those policies should make a clear distinction between an allegation, a complaint or a concern about the quality of care or practice.

Allegations as defined by KCSiE should be reported to the LADO. Complaints or concerns can be managed independently by the school or college 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 LLC's , which do not reach the allegations harm threshold (or complaints criteria) should be dealt with under a school LLC procedure.

**Procedure for Allegations that meet the harm threshold.**

This procedure should be used in all cases when it is alleged a member of staff, supply staff, volunteer, 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 criteria above) the LADOs 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

WSCC Policy 2026/27

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 our referral process:

- Staff will report any concerns about the conduct of any member of staff, supply staff or volunteer to the headteacher as soon as possible.

- If an allegation is made against the headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.

- There may be situations when the headteacher or Chair of Governors 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 headteacher or Chair of Governors, they will contact the LADO via the portal Online Portal or 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.

WSCC Policy 2025/27

## Low-Level Concerns (LLCs)

| Ferring CE Primary School | |
|---|---|
| Policy: | **Low Level Concerns Policy** |
| Policy date: | Autumn 2026 |
| Review date: | Autumn 2027 |
| Person responsible | Headteacher |

**Rationale**

This policy should be read in conjunction with Ferring CE School's Safeguarding Policy and Procedures, Staff Code of Conduct and Whistleblowing Policy, to enable staff to share their concerns, no matter how small, about their own or another member of staff's behaviour.

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the school's Code of Conduct are constantly lived, monitored and reinforced by all staff. The school deals with all concerns about adults working in or behalf of the school appropriately and promptly.

The school seeks to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below expected professional standards.

**This policy seeks to:**

• ensure that staff are clear about, and confident to distinguish between, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the blurring of professional boundaries and reporting lines
• empower staff to share any low-level concerns with the Headteacher
• help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage
• identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO
• provide for responsive, sensitive and proportionate handling of such concerns when they are raised
• help identify any weaknesses in the organisation's safeguarding system.

This policy applies to all staff at Ferring CE School.

**Defining a Low-Level Concern**

A low-level concern is one that does not meet the harm threshold as stated in the school's Safeguarding Policy. That is, when anyone working in a school (including volunteers, supply staff and contractors) has:
• behaved in a way that has harmed a child, or may have harmed a child
and/or;
• possibly committed a criminal offence against or related to a child and/or;
• behaved towards a child or children in a way that indicates he or she may
pose a risk of harm to children; and/or
• behaved or may have behaved in a way that indicates they may not be suitable to work with children (which includes behaviour that may have happened outside school posing a transferable risk to children).

WSCC Policy 2026/27

Responses and actions to behaviours that may meet the harm threshold are contained specifically within the School's Safeguarding Policy, 'Allegations Regarding Staff (or volunteers)'. These should be reported to the Headteacher without delay.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' (i.e. they believe it could be a concern) – that an adult working in or on behalf of the school may have acted in a way that:
• is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
• does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:
• being over friendly with children;
• having favourites;
• taking photographs of children on their mobile phone;
• engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
• using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

**Responsibilities of staff**

It is important that all staff are clear of the expectations the school stipulates from them as contained in the Staff Code of Conduct. This is covered annually by the Designated Safeguarding Lead, and as part of the school's induction for new staff.

It is crucial that any concerns in relation to a staff member's behaviour, including those which do not meet the harm threshold, are shared responsibly and with the Headteacher. This should be done without delay.

Where there are concerns/allegations about the Headteacher, this should be referred to the Chair of Governors.

Staff members who are concerned about how their behaviour may have been interpreted, or, on reflection, re-evaluate their behaviour as one that may have been in contrary to the school's code of conduct and expectations, they self-refer to the Headteacher.

**Dealing with Low-Level Concerns**

All low-level concerns may be shared verbally with the Headteacher in the first instance, but must then be recorded in writing.

The record should include:
• details of the concern
• the context in which the concern arose
• action taken

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Where the low-level concern is provided verbally, the Headteacher should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above. Records will be signed, timed and dated.
Records will remain confidential in accordance with the school's Data Protection policies and GDPR.

VSCC Policy 2026/27

**Responding to a Low-Level Concern**

The Headteacher will in the first instance satisfy themselves that it is a low-level concern and should not be reclassified as a higher level concern/allegation and dealt with under the appropriate procedure below.

The circumstances in which a low-level concern might be reclassified are where:
(a) the threshold is met for a higher-level concern/allegation
(b) there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
(c) there is other information which when taken into account leads to a higher-level concern/allegation.

Where the Headteacher is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a 'no-names' basis.

Having established that the concern is low-level, the Headteacher will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the concern has been raised via a third party, the Headteacher should collect as much evidence as possible by speaking:
• directly to the person who raised the concern, unless it has been raised anonymously;
• to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Details of the concern will be recorded along with the rationale for decisions and action taken.

Any conversation with a member of staff following a concern will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may be required. Some concerns may trigger the school's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate. Some concerns may be related to performance management and advice may be sought from the school's HR providers.

**Monitoring of Low-Level Concerns**

The Headteacher will securely retain confidential files on low-level concerns. A central log will be shared and monitored by the school's Senior Leadership Team on a monthly basis to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record will be kept of this review within SLT Minutes.

No record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:
(a) the concern (or group of concerns) has been reclassified as a higher-level concern, or
(b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

VSSC Policy 202627

**Further References**

Farrer & Co – Developing and implementing a low-level concerns policy: a guide for organisations which work with children – Adele Eastman, Jane Foster, Owen O'Rorke and David Smellie. 2020 https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concernsguidance-2020.pd

Department for Education, Keeping Children Safe in Education 202 https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2025.pdf

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2 Working together to Safeguard Children.

Statutory guidance on inter-agency working to safeguard and promote the welfare of children. https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

***Appendix 1: Low-Level Concern Form - Template***

| |
|---|
| **CONFIDENTIAL ONCE COMPLETED**<br><br>**[Name Of School] LOW-LEVEL CONCERN FORM** |
| Your Name |
| Your Role |
| Date and time form was completed |
| **DETAILS OF INDIVIDUAL WHOM THE CONCERN IS ABOUT** (or yourself if self-reporting) |
| Their Name |
| Their Role |
| Your relationship to the individual at the school (e.g., manager, colleague) |
| **DETAILS OF LOW-LEVEL CONCERN** |
| Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our school's [Enter details here e.g., Staff Code of Conduct]? |

WSCC Policy 2026/27

| DETAILS OF ANY CHILDREN INVOLVED |
|---|
| Their name(s) |
| **FOR USE BY HEADTEACHER ONLY [or alternative]** |
| Date and time low-level concern form received |
| Signature |
| Role |
| Actions to be taken and follow-up notes<br><br>**CONFIDENTIAL ONCE COMPLETED** |

WCC Policy 2026/27

**Note:** This record will be held securely in accordance with the school's Low-Level Concerns Policy. Low-level concerns will be treated in confidence as far as possible, but the school may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.
END OF LOW-LEVEL CONCERN FORM CREATED BY KMG SHRS 19/08/2022 AND FINALISED 02/12/2022

The LLC 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 or College 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 independently by the school or college under internal procedures.
Examples of LLCs include, but is 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 or colleges 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.**

WSCC Policy 2026/27

## *Annex 4 - Sexual violence and sexual harassment between children in schools and colleges*

| Ferring CE Primary School | |
|---|---|
| Policy: | **Child on child – Model Policy** |
| Policy date: | Autumn 2026 |
| Review date: | Autumn 2027 |
| Person responsible | Headteacher |

### Context

This policy is about how staff should respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of school or college premises, and or online. All staff are advised to maintain an attitude of "It could happen here"

Schools and colleges 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 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

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and by other children.

We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE (2025)

WSCC Policy 2026/27

This policy is underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

We will minimise the risk of child-on-child abuse by: -

**Prevention:**

- 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 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 our 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 as soon as practicably possible but at least within 24 hours.
- 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 (01403 229900).

**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.

WSCC Policy 2026/27

**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.

**Options: The DSL will manage the report with the following options: -**

- Manage internally
- Refer to Early Help
- Refer to Children's Social Care
- Report to the police (generally in parallel with a referral to Social Care)

**Ongoing Response:**

- **All** concerns, discussions and decisions made, and the reasons for those decisions, should 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 same school or college would seriously harm the education or welfare of the victim (and potentially other pupils and students).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, 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 and college 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.

WSCC Policy 2026/27

- 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 or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own 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.

References: –
KCSiE (DfE 2025)

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## *Annex 5 - Online Safety and Artificial Intelligence (AI) and mobile phone.*

As a school it is essential that we safeguard children from potentially harmful and inappropriate online material.

A comprehensive approach to online safety empowers staff to protect and educate pupils, students, and colleagues in their use of technology and establishes the following 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 sharing of self-generated intimate images and/or videos including those generated 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 we feel pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

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

There should be appropriate filtering and monitoring in place on all school devices and school networks. That staff training should include understanding roles and responsibilities in relation to filtering and monitoring. To support schools with this the DfE have produced the following guidance: Appropriate Filtering and Monitoring - UK Safer Internet Centre

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the National Education Network. In addition, schools and colleges should consider meeting the Cyber security standards for schools and colleges.GOV.UK. Broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff - NCSC.GOV.UK

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We 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.

The Online Safety Act 2023 (the Act) is a new set of laws that protects children and adults online. It puts a range of new duties on social media companies and search services, making them more responsible for their users' safety on their platforms. The Act will give providers new duties to implement systems and processes to reduce risks their services are used for illegal activity, and to take down illegal content when it does appear.
Online Safety Act: explainer - GOV.UK

**Artificial Intelligence (AI)**

The Department has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education

Generative AI: product safety expectations - GOV.UK

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

**Mobile phones**

Our school will be a mobile phone-free environment.

Our pupils will not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

Examples of possible methods for achieving this
Creating a mobile phone-free environment: school case studies - GOV.UK

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## *Annex 6 - Whistleblowing*

**Whistleblowing in a safeguarding context**

Every school should have a whistleblowing procedure. Whistleblowing procedures protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

This does not replace the whistleblowing policy and should be read in conjunction with the school 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.

Within *Ferring CE Primary*, the *headteacher James Cox* is the senior manager and responsible for all staff. If you are concerned that any member of staff within the school is not following safeguarding processes or behaving in a way that is placing children at risk, you should make the headteacher aware.

If your concern is about the headteacher, you should raise this with the Chair of Governors by [process to contact CoG or equivalent]

If you would prefer to raise your concerns outside the school environment you can contact Children's Social Care by calling 01403 229900 Local Authority Designated Officer via Online Portal

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## *Annex 7 - Briefing sheet for temporary and supply staff*

**For supply staff and those on short contracts in *Ferring CE Primary* school**

While working in *Ferring CE Primary* 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), who is *Viv Squires* and can be found *dsl@ferringceschool.co.uk*

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 write down what you saw or heard, date and sign your account, and give it to the DSL as soon as possible and no longer than 24 hours later. 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 should 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, in T:\Safeguarding\2026 - 2027

If your concern involves the DSL or a member of the senior staff, inform the head teacher and consider/discuss contacting the LADO via the Online Portal
**Remember, if you have a concern, report it.**

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## *Annex 8 - What is child abuse?*

The following definitions are taken from W*orking Together to Safeguard Children* HM Government (2023) 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

**What is abuse and neglect?**
Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

**Physical abuse**
Physical abuse 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 persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse**
Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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**Neglect**
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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

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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

**<u>Emotional abuse</u>**

**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

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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.

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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 body map (appendices 2*)* can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries, and no child should be asked to remove clothing by a member of staff of the school.

**Indicators of physical abuse / 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

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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.

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## *Annex 9 – Prevent Duty*

**Preventing Radicalisation and Extremism**
**1. Staff Training**

Our school/college 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.

**2. 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.

**3. Definitions**

- **Extremism** — vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. It also includes calls for the death of members of the UK armed forces.
- **Radicalisation** — the process by which a person comes to support terrorism or extremist ideologies associated with terrorist groups.
- **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.

**4. 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.

**5. Legal Duty**
Our school/college is subject to the statutory duty under Section 26 of the Counter-Terrorism and Security Act 2015, requiring us to have *"due regard to the need to prevent people from being drawn into terrorism."* This is known as the Prevent Duty.

**6. 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.

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**7. 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), pages 171–173

**8. 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.

**9. Referral Process**
Prevent referrals may be considered by a Channel Panel, which assesses vulnerability and determines appropriate support. A representative from our school/college may be asked to attend the panel to contribute to the assessment.
Engagement with Channel is entirely voluntary at every stage.

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

**11. 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 Childrens Partnership Channel - West Sussex SCP

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## *Annex 10 - Useful contacts*

| Key Personnel | Name (s) | Telephone No. |
|---|---|---|
| DSL | Viv Squires | 01903 243945<br>dsl@ferringceschool.co.uk |
| Deputy DSL(s) | James Cox | 01903 243945<br>dsl@ferringceschool.co.uk |
| School's named Prevent lead | James Cox | 01903 243945<br>dsl@ferringceschool.co.uk |
| Schools Mental Health Lead | Anna Todorova | 01903 243945<br>sbm@ferringceschool.co.uk |
| Nominated Safeguarding Governor | David Munro | 01903 243945<br>dmunro@ferringceschool.co.uk |
| Chair of Governors | Dawn Kennett | 01903 243945<br>dkennett@ferringceschool.co.uk |
| Integrated Front Door | | 01403 229900 |
| Safeguarding in Education Team | Sally Arbuckle (Manager)<br>Charlotte Whittington<br>Gabby Rodrigues<br>Natasha Cherryman<br>Sarah Newland-Young<br>Michelle Frangos | 0330 222 4030<br>Safeguarding.education@westsussex.gov.uk |
| Police | | 101 or in emergencies 999 |
| Safeguarding advisors / Local Authority Designated Officers (LADOs) | Miriam Williams<br>Donna Tomlinson<br>Vic Williams | Online Portal |
| School nurse | | |

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## *Annex 11 - Table of changes 2026*

Throughout the document changes have been made to punctuation, grammar and readability. These have not all been highlighted in the table below.

| Page | Changes |
|---|---|
| 19 | Additional wording to Child-on-child abuse added to reflect additions in KCSIE 2026. |
| 24 | Annex 5 now includes mobile phone use and guidance. |
| 33 | Annex 9 Prevent duty added to page 33. |

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## *Appendices 1 - Recording Steps on CPOMS*

**How do I log an incident?**

a) Click on **Add Incident** in the purple banner at the top of the initial screen.

b) Enter the **Student's** name in the student box it will show options from SIMS as you type.

**PLEASE ENSURE YOU SELECT THE CORRECT NAME**

c) Enter your concern in the **Incident** box.

**Guidelines for recording an incident on CPOMS**

- Write a **succinct** and **factual** account of the incident/observation
- Remember, anything you write on CPOMs could be subject to freedom of information and could, therefore, be seen by parents, courts or serious case reviews
- Do not express your opinion as these records could be used as evidence. Do not add multiple exclamation marks or write in capital letters when making your entry even though you may feel frustrated. Below are examples of your opinion rather than facts:
    - Really angry
    - Threatening
    - Rude
    - Stormed off
    - Aggressive
    - As per usual.…
    - Surprisingly … (avoid adverbs such as this)
    - The repetition of such incidents is becoming frustrating for staff and other children … (be careful not to express you own emotions regarding the situation. If CPOMs is called as official evidence, it will be very unhelpful.)
- Aim to remain factual
    - The parent spoke loudly in close proximity to my face (approx. 15cm)
    - The parent paced the room. Her fists were clenched. She would not respond to the invitation to sit down.
    - The child was tearful. They struggled to speak whilst crying. They repeatedly asked if I could not tell anyone (approx. 6 times). Their emotions and language suggested to me they were distressed.
    - I felt threatened because the parent used the phrase 'I'll make sure you don't say things like this again'.

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- I felt the parent had become angry with me because he told me in a loud voice 'You are a complete bitch and don't care about me or my children in the slightest'. (Write the actual language that was used).

- Use full names **not initials** as it can be difficult to identify who the adults and children are. The site is very secure. Do not add names of other children who may have been involved, for example,
  - Mr J Smith was informed that his daughter, Amelia Cooper, had repeatedly threatened another child over the last two days. A meeting has been set up with Mr Smith and Jane Best (AHT) after school today.
  - (If there is a common family first name ensure you identify the role clearly, e.g., John Smith (father)).
- Be careful to be accurate and specific as once you submit the incident **you cannot delete it**. Whilst the incident can be edited, this is time-stamped and shows as an edit on the system.
- Incidents should be added as soon as possible after the event but must be within 24 hours. **IF YOU ARE CONCERNED ABOUT A CHILD'S IMMEDIATE SAFETY OR NEED SOME ADVICE PLEASE SEEK OUT ONE OF THE DSLs (Trudi Sammons, Emma Britton, Jade Faircloth, Fiona Mitchell or Helen Collin TO PASS ON YOUR CONCERN IN PERSON BEFORE RECORDING IT ON CPOMS.**
- Some incidents will require an action. If you have already taken action, make sure you record this as part of the incident. If there are any additional actions following senior leader input these must also be recorded as part of the log.
- The person who has the concern or observation must be the person who records the incident; it cannot be passed on to another person.
- Please don't use CPOMS to have a conversation. It is essential however, to make an entry once you have followed up an action describing what the outcomes were. So, if one of the actions is that you will make a phone call to a parent or agency, please make sure that the main points of this conversation is summarised on CPOMS too.

d) **Categories:** Every incident must be linked to a category. Select a category which you feel best describes your concern. (See definitions list attached)

e) **Linked Student(s):** The use of this category is likely to be rare. It is necessary to add a separate entry for each child, particularly if one is a victim and one an initiator. If there is a child protection incident you may wish to link this with a sibling. Where a group of children have been involved in the same incident, it is preferable to copy and paste an entry so names can be changed rather than including them all. However, if you are unsure, it is always best to check with the DSL or HT.

f) **Body Map** – Please complete if applicable**.**

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g) **Date/Time:** Record the date and time of the incident itself.

h) **Alert Staff Members**: Each staff 'group' is represented by the buttons, clicking a button will mean that everyon**e** in that group will be alerted and be able to read the Incident. To alert specific individuals start to type the name and options will appear.

**Who to Alert: (or Pre-Set Alerts) [School to determine protocols in this section]**

- Alert SLT to all incidents
- Alert the class teacher of the child concerned
- If the child has an adult working with them 1:1 then it is a good idea to alert them
- You may want to alert the Year leader to keep them in the loop
- You may wish to alert the whole year team if it is an issue concerning several children or something that everyone needs to know. The alert will go to all the teachers, HLTA/LSAs and any other appropriate staff members working in that year group.
- If it is an issue involving a parent or a health concern, then it is a good idea to alert the admin team as the parent or child are likely to end up in the office.
- If it is a child or family who the school or partnership family worker is involved with then she also needs to be alerted.

i) **File(s):** The option to upload documents is available here e.g. previous school notes, letter from social services (generally this will only be used by SLT, SENCO or Class teachers). Before uploading a file, it is important to raise an incident simply stating the name of the file you intend to upload. This will ensure the document in correctly listed in the child's chronology.

j) **Agencies:** Select from the list of agencies pre-populated in the system if appropriate.

k) **Add Incident**: Click to submit the incident and alert members of staff - remember **YOU CANNOT EDIT THE INCIDENT ONCE IT IS SUBMITTED**. If you make a significant mistake and realise after it is submitted, take note of the incident ID number (top left corner of the incident) and let the administrators know.

l) Once you have finished adding the incident please remember to log out.

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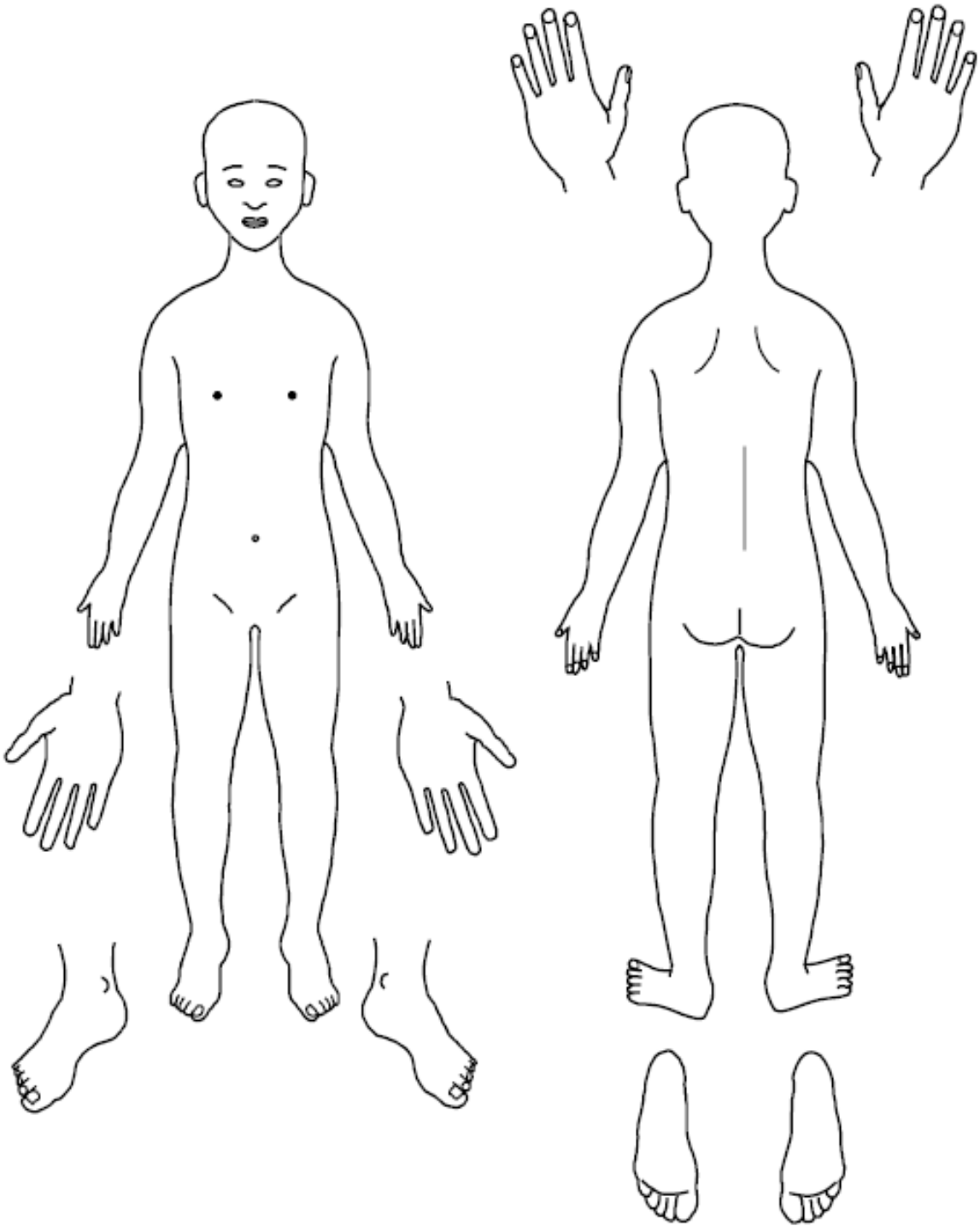
## *Appendices 2 - Skin map*

Name of Child: _____

Date of birth: _____ Date of recording: _____
Name of person completing: _____



Any additional information:

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