

Our Lady of Sion School

Safeguarding and Child Protection Policy 2025 (in collaboration with West Sussex Safeguarding Children Partnership)

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Contents Page

Page	Contents	
2	Contents Page	
3	Policy Statement and Definitions	
4	Aims/Principles and Values	
5	Leadership and Management/Training	
6	Training Continued and Referral	
7	Pupil Education and safeguarding awareness/dealing with concerns and	
	allegations against staff	
8	Dealing with children abusing children and legal context and guidance	
9	Roles and responsibilities within our lady of Sion school	
10	Senior management and governing body responsibilities	
11	DSL responsibilities	
12	OLOS Child Protection procedures	
13-15	Procedures is abuse is suspected or disclosed	
16	Flowchart for procedures	
17-18	Dealing with disclosures	
19-20	Allegations against adults who work with children	
21	Referral process	
22	Supply Staff	
	Lower-Level Concerns (LLC)	
23-26	Sexual harassment and violence between children in schools	
27-29	Online safety and AI	
30	Whistleblowing	
31-32	Briefing sheet for temporary staff and supply staff	
33-35	What is Child Abuse?	
36-37	Safeguarding personnel and contacts	

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 (KCSIE), Statutory Guidance for Schools and Colleges

Our Lady of Sion School recognises its **moral and statutory responsibility** to safeguard and promote the welfare of all children. We are committed to providing a **safe and welcoming environment** underpinned by a culture of openness, where both children and adults feel secure, able to speak up, and confident that they will be listened to.

We maintain an attitude of "it could happen here" in all matters relating to safeguarding.

The purpose of this policy is to:

- Provide **staff**, **volunteers**, **and governors** with a clear framework to safeguard and protect children.
- Inform parents and guardians how we will protect their children while they are in our care.

Detailed guidance for staff can be found within the associated **procedure documents**, which should be read alongside this policy.

Definitions

Child Protection

Child protection is a component of safeguarding that focuses on how we respond to children who have been significantly harmed or are at risk of significant harm.

Staff

The term *staff* refers to all individuals working for or on behalf of the school, whether full-time or part-time, in a **paid or voluntary capacity**. This definition also includes **parents and governors**.

Child

A *child* refers to all young people who have not yet reached their 18th birthday. While this primarily applies to pupils of Our Lady of Sion School, the policy also extends to **visiting children and students from other establishments**.

Parent

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

Abuse

Abuse may include **neglect**, **physical abuse**, **emotional abuse**, **sexual abuse**, or any combination of these. It also encompasses **children witnessing domestic abuse**. Children can be harmed by **direct acts** or through a **failure to provide proper care**. Detailed explanations of each form of abuse are provided within the **procedure documents**.

Aims

The aims of this policy are to:

 Provide staff with a clear framework to promote and safeguard the wellbeing of children, ensuring that they meet their statutory responsibilities.

- Ensure consistent good practice across the school in all matters relating to safeguarding.
- Demonstrate the school's commitment to protecting children and promoting their welfare.

Principles and Values

Our Lady of Sion School is guided by the following principles and values:

- Children have a right to feel secure and cannot learn effectively unless they do.
- All children have a right to be protected from harm.
- All staff play a key role in the prevention of harm and share 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 the wider
 community, while considering contextual safeguarding.
- **Partnership working is essential.** We recognise the importance of working collaboratively with other agencies to protect children and reduce risk, engaging fully in the child protection process.
- Working with parents. While the school will work openly with parents wherever 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.
- Professional curiosity. All adults working within the school should maintain professional curiosity and vigilance if they are concerned about a child.

Leadership and Management

Our school has established **clear lines of accountability, training, and advice** to support child protection and the safeguarding responsibilities of individual staff.

Any staff member can contact the Designated Safeguarding Lead (DSL) or their Deputy DSLs (DDSLs)
if they have concerns about a child or young person.

Designated Safeguarding Team:

- **DSL:** Steve Jeffery
- Deputy DSLs: Helen Davis, Maria Manco, Sarah Summers

Governance:

- Nominated Safeguarding Governor: Dr Sue Coldwell, responsible for leadership in safeguarding.
- **Chair of Governors:** Mrs Katy Henwood, who will receive reports of allegations against the Headteacher and act on behalf of the governing body.

Safer Recruitment:

• As an employer, the school follows **Safer Recruitment guidance** outlined in *KCSiE 2025*, including informing shortlisted candidates that **online searches** will be carried out.

Training

All staff at Our Lady of Sion School are expected to **recognise the signs and symptoms of abuse** and respond appropriately. To support this:

- Annual Safeguarding Review: Each August, before the new academic year, all staff participate in a review of safeguarding and child protection duties and processes. This includes updates from *Keeping Children Safe in Education (KCSIE 2025)* and other relevant statutory guidance.
- **Ongoing Training:** The **DSL** provides updates throughout the academic year on important national and local safeguarding concerns, including online safety.
- Induction for New Staff: All new staff receive training upon appointment from the DSL. This covers:
 - o Policy awareness
 - o Safeguarding processes and protocols specific to Our Lady of Sion School
 - Information about local safeguarding partners
- DSL Training: The DSL undertakes formal training at least every two years to maintain knowledge and skills necessary for their role. Ongoing professional development is conducted through the National College, local network meetings via West Sussex, or organisations such as the Society of Heads and ISA.
- **Updates to Guidance:** Any national or local safeguarding updates are shared with staff via briefings and incorporated into the next whole-school training session. The policy is updated during the year to reflect any changes brought about by new guidance.
- Governor Training: Governors receive safeguarding training as required by KCSiE 2025.

Referral

Following any concern about a child, the **Designated Safeguarding Lead (DSL)** will:

- 1. **Assess the information** to determine whether significant harm has occurred or is at risk of occurring.
- If the evidence indicates that the threshold of significant harm has been reached—or it is unclear—the DSL will contact Children's Social Care and, where appropriate, the police. The guidance from the National Police Chiefs' Council (NPCC) will be followed to determine when police involvement is required.

If the DSL or **Deputy DSL (DDSL)** is unavailable, or there are **immediate concerns**, the staff member must refer directly to **Children's Social Care** and the police if appropriate.

Parental Involvement:

- Wherever possible, the DSL will **inform parents** prior to making a referral.
- In certain circumstances, informing parents may place the child at further risk, and in such cases, parental notification may be withheld.
- Exception: In cases of known Female Genital Mutilation (FGM), there is a mandatory requirement for teachers to report directly to the police. The DSL must also be informed.

Confidentiality

All matters relating to child protection are confidential and must only be shared according to the DfE
 2024 Information Sharing Advice for Practitioners.

- There is a **lawful basis** for sharing child protection concerns with agencies that have a **statutory duty** to protect children.
- Within the school, information will only be shared with those who "need to know" to safeguard the child effectively.
- All staff are aware that they cannot promise confidentiality to a child making a disclosure.

Pupil Education and Safeguarding Awareness

Our Lady of Sion School is committed to educating pupils so that they can **recognise when they are at risk** and know **how to seek help** when needed. This is achieved through:

- Tailored Curriculum Content: The curriculum is adapted to meet the specific needs and vulnerabilities of individual children, including those who are victims of abuse and children with Special Educational Needs and Disabilities (SEND).
- School Ethos: We foster an environment in which children feel safe and are encouraged to speak freely about their concerns, confident that they will be listened to and valued. We also have an anonymous reporting system called "What Matters?". Children can raise concerns using this system and the SLT receive notifications. However, we do always encourage our young people to speak with us in person.
- We meet with classes/year groups each half-term to ask, "What Matters?" providing opportunities for children to share any concerns around world/local issues, school culture/school matters etc.
- Access to a Trusted Adult: Every child is supported by at least one trusted adult within the school whom they can approach with any concern.
- Online Safety Education: Children are taught how to keep themselves and others safe online, including recognising risks and reporting concerns appropriately.
- Additional Safeguarding Methods: Assemblies, workshops, or external safeguarding programmes as they become available and relevant.

This approach ensures that safeguarding is **embedded across the school experience**, empowering pupils to take an active role in their own protection and wellbeing.

Dealing with Concerns and Allegations Against Staff

If a concern is raised about the **practice or behaviour of a member of staff**, the following process will be followed:

- 1. The concern will be **recorded** and passed to the **Headteacher** Mr Steven Jeffery
- 2. The Headteacher will assess whether the matter constitutes a 'low-level concern' or an 'allegation'.
- 3. For all allegations, the **Local Authority Designated Officer (LADO)** will be contacted, and the relevant guidance followed.
- 4. If the Headteacher requires advice, they will contact the LADO.
- 5. If the allegation is against the **Headteacher**, the person receiving the allegation will contact the **LADO** or **Chair of Governors** directly.

Reference: See Annex 3 for full guidance on allegations against adults working with children.

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.

Reference: See **Annex 4** for detailed procedures that West Sussex use for Child-on-Child abuse. Our Lady of Sion School also holds Child-on-Child Abuse policies for children in the Junior School and Senior School (with age-appropriate language to support understanding). There is a Junior School policy and a Senior School policy.

Legal Context and Guidance

Legal Context

This policy is informed by the following legislation:

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

Guidance

This policy also reflects statutory guidance and procedures, including:

- West Sussex Safeguarding Children Partnership (WSSCP) protocols and guidance
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (KCSiE) GOV.UK
- Female Genital Mutilation (FGM) Act 2003 Mandatory Reporting Guidance (2016)

Policy Review

This policy is reviewed at least annually to ensure compliance with:

- DfE statutory guidance
- West Sussex Safeguarding Children Partnership (WSSCP) requirements
- West Sussex County Council (WSCC) guidance
- Any other relevant statutory requirements

Roles and Responsibilities within Our Lady of Sion School

Staff Responsibilities

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

- Create a Safe Environment: Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- **Promote Trusted Relationships:** Ensure children know there are adults in the school they can approach if they are worried or have concerns.

- **Curriculum Planning:** Plan opportunities within the curriculum for children to develop the skills they need to **recognise**, **assess**, **and manage risk** appropriately and keep themselves safe.
- Ongoing Training: Attend training to remain aware of and alert to the signs of abuse.
- Professional Vigilance: Maintain an attitude of "it could happen here" with regard to safeguarding.
- Mental Health Awareness: Be aware that mental health problems can sometimes indicate that a child has suffered or is at risk of abuse, neglect, or exploitation.
- **Understanding Impacts:** Recognise that abuse, neglect, or other adverse childhood experiences can impact a child's **mental health, behaviour, and education**.
- Recording and Reporting: Record any concerns regarding abuse and report these to the Designated
 Safeguarding Lead (DSL) as soon as practicable that day. If the DSL is not immediately contactable, a
 Deputy DSL (DDSL) should be informed.
- **Direct Referral:** Be prepared to refer directly to **social care or the police** if there is a risk of significant harm and the DSL or DDSL is unavailable.
- Allegations Against Staff: Follow the allegations procedures (Annex 5) if the disclosure involves a member of staff.
- Follow Guidance: Follow procedures set out by the WSSCP and guidance issued by the DfE.
- Support Plans: Support pupils in line with their child protection or child in need plans.
- Confidentiality: Treat information confidentially, but never promise to keep a secret.
- Attendance Monitoring: Notify the DSL or DDSL of any child on a child protection plan or child in need plan who has unexplained absence.
- **Early Help:** Understand and identify children who may benefit from **Early Help interventions**, and liaise with other agencies to provide support.
- Know the DSL/DDSL: Ensure they know who the DSL and DDSL are and how to contact them.
- Policy Awareness: Have an awareness of the Child Protection Policy, Behaviour Policy, Staff
 Behaviour Policy/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

The Senior Management Team (SMT) at Our Lady of Sion School will:

- Inter-agency Working: Contribute to effective inter-agency working in line with Working Together to Safeguard Children (2023 guidance).
- Early Help: Provide a coordinated offer of early help when the additional needs of children are identified.
- **Staff Awareness:** Ensure staff are alert to the various factors that can increase the need for early help, as outlined in **KCSIE 2025**, **Part One**, **Paragraph 28**.
- **Support to Social Care:** Work with **Children's Social Care** to support assessment and planning processes, including attendance at **child protection conferences and core group meetings**.

 Delegated Tasks: Carry out tasks delegated by the governing body, such as staff training, safer recruitment, and maintaining the Single Central Record.

Advice and Guidance: Provide support and advice on all matters relating to safeguarding and child

protection to all staff, regardless of their position in the school.

• Confidentiality and Respect: Treat any information shared by staff or pupils with respect, following

agreed policies and procedures.

Allegations Management: Ensure that allegations or concerns about staff are handled in accordance

with **DfE guidance and WSSCP procedures**.

Assessment of Concerns: Determine whether a concern about a member of staff constitutes a 'low-

level concern' or an allegation.

Governing Body Responsibilities

The governing body will ensure that:

• Effective Policies: The school has effective safeguarding policies and procedures, including a Child Protection Policy, Staff Behaviour Policy (Code of Conduct), Behaviour Policy, and a response to

children who go missing from education.

• Annual Reporting: The WSSCP is informed, in line with local requirements, about the discharge of

duties via the annual safeguarding self-assessment.

• Safer Recruitment: Recruitment, selection, and induction follow safer recruitment practices,

including all necessary checks.

• Allegations Management: Allegations against staff are handled by the headteacher, and allegations

against the headteacher are managed by the **Chair of Governors**.

• DSL Appointment: A member of the Senior Leadership Team is appointed as the Designated

Safeguarding Lead (DSL) and has this responsibility recorded in their job description.

• Staff Training: Staff are trained appropriately in safeguarding, with updates in line with KCSIE 2025

guidance.

Address Deficiencies: Any safeguarding deficiencies or weaknesses are remedied without delay.

• Safeguarding Governor: A nominated governor for safeguarding is identified to oversee and support

the school's safeguarding practices.

Designated Safeguarding Lead (DSL) Responsibilities

(To be read in conjunction with the DSL role description in KCSiE 2025)

DSL: Steve Jeffery

Deputy DSL(s): Helen Davis, Sharon Bruwer (SENCO), Maria Manco (Junior School)

Page 9 of 31

In addition to the responsibilities of all staff and the Senior Management Team, the DSL will:

- Referral: Refer cases to Children's Social Care and the police, where appropriate, in a timely manner, avoiding any delay that could increase risk to the child.
- **Support Governing Body:** Assist the governing body in fulfilling their statutory safeguarding responsibilities as outlined in legislation and guidance.
- Training & Development: Attend appropriate training and demonstrate evidence of continuous professional development (CPD) to effectively carry out the DSL role.
- Staff Awareness: Ensure all staff know who the DSL and Deputy DSL(s) are, understand the DSL role, and know how to contact them.
- Staff Responsibilities: Ensure that staff and volunteers understand their responsibility to remain alert to signs of abuse, report any concerns about a child to the DSL, and raise concerns about an adult to the headteacher.
- **Information Sharing:** Ensure staff who need to know are aware of children who have experienced, or are experiencing, abuse in order to **support their educational outcomes** and provide appropriate care.
- Whole-School Training: Ensure safeguarding training occurs regularly, with at least annual updates, so staff and volunteers can carry out their responsibilities knowledgeably.
- **Induction of New Staff:** Ensure any staff joining outside the agreed training schedule receive **induction training** before starting their duties.
- **Record Keeping:** Maintain **secure, separate records** of child protection concerns, using them to support risk assessment and ongoing monitoring.
- Transfers & Transitions: Ensure safeguarding records are transferred promptly (separate from pupil files) when a child moves schools. For children on a child protection plan or who are looked after, information should be shared immediately with the receiving school and the child's social worker. Complex cases may require a transition meeting prior to transfer.
- **Local Guidance:** Stay informed of training opportunities and **briefings provided by WSSCP** to ensure staff are aware of the latest local safeguarding guidance.
- Policy & Procedure Development: Develop, implement, and review school procedures to identify and report all cases, or suspected cases, of abuse.
- KCSiE 2025 Compliance: Fulfil any additional expectations set out for DSLs in KCSiE 2025.

Our Lady of Sion Child Protection Procedures

Overview

These procedures apply to **all staff** working within the school. They are reinforced through training to ensure every member of staff understands their role and responsibilities.

The aim is to provide a **robust and consistent framework** enabling 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 the **interests and safety of the child**. Where there is any conflict of interest between a child and an adult, the interests of the child must always be paramount.

Staff are aware that:

- Very young children, those with disabilities, special educational needs, certain medical conditions, or with English as an additional language may face greater barriers to communication.
- Such children may express concerns through behaviour rather than words.
- Particular vigilance is required when observing the causes of knocks and bumps in children with limited mobility, including pupils and any younger siblings or visiting children on site.

Procedures if Abuse is Suspected or Disclosed

If a member of staff suspects abuse, notices signs or indicators of abuse, or has a disclosure made to them, they must follow these steps:

1. Initial Record

Make an initial written record of the information immediately.

2. Report to the DSL

Report the concern to the Designated Safeguarding Lead (DSL) without delay.

3. Medical Needs

- o The DSL will consider whether immediate **medical intervention** is required.
- o Urgent medical attention must **not be delayed** if the DSL or Deputy DSL (DDSL) is unavailable.

4. Formal Record

- Make an accurate and detailed record as soon as possible, and always within 24 hours. At Our Lady of Sion School, you must make this record on our safeguarding/pastoral system, CPOMS. CPOMS includes body-maps within the system.
- o The record should include:
 - Dates and times of observations.
 - Dates and times of any discussions in which the member of staff was involved.
 - Details of any injuries.
 - Explanations given by the child and/or adult.
 - Actions taken.
 - Any actual words or phrases used by the child (recorded verbatim wherever possible).
- All records must be signed and dated by the author.

5. Referral if DSL/DDSL Unavailable

 In the absence of the DSL or Deputy DSL, staff must be prepared to refer concerns directly to Children's Social Care (and the police, if appropriate) if a child may be at risk of immediate or significant harm.

Following a Report of Concerns - Role of the DSL

When a concern is reported, the **Designated Safeguarding Lead (DSL)** (or Deputy DSL in their absence) must take the following actions:

1. Initial Consideration

- Decide whether there are sufficient grounds to suspect that a child is suffering, or is likely to suffer, significant harm.
- o If so, a **referral must be made immediately** to **Children's Social Care** and, where appropriate, the **police**, in line with the **National Police Chiefs' Council "When to Call the Police" guidance**.
- o The rationale for all decisions must be clearly recorded.

2. Parental Involvement

- Wherever possible, the school should discuss concerns about a child's welfare with their family and seek parental agreement before making a referral.
- However, in line with DfE guidance, this should not be done if it could:
 - Place the child at increased risk of harm, or
 - Compromise a police investigation.
- Where there is doubt, the DSL should consult with **Children's Social Care** or the **police** to agree whether, when, and by whom parents will be informed.
- o The **child's views** should also be taken into account where appropriate.

3. Referral to Children's Social Care

- o If there are grounds to suspect significant harm, the DSL (or Deputy) must make a referral via:
 - Request support or raise a concern about a child West Sussex County Council
 - Clearly stating:
 - The known facts
 - Any suspicions or allegations
 - Whether or not there has been any contact with the child's family
- o If immediate action is required, contact the Integrated Front Door (IFD) on 01403 229900.

4. Immediate Danger

- o If a child is in immediate danger, the police must be called without delay.
- o The DSL must also notify **Children's Social Care** of the occurrence and the action taken.

5. Urgent Medical Attention

- Where a child requires urgent medical attention and there is suspicion of parental abuse as the cause, the DSL (or Deputy) must:
 - Take the child to the nearest Accident & Emergency department.

- Inform Children's Social Care immediately.
- Seek advice from Children's Social Care about informing parents, bearing in mind that normally parents should be told if their child requires urgent hospital treatment.

6. No Immediate Risk of Significant Harm

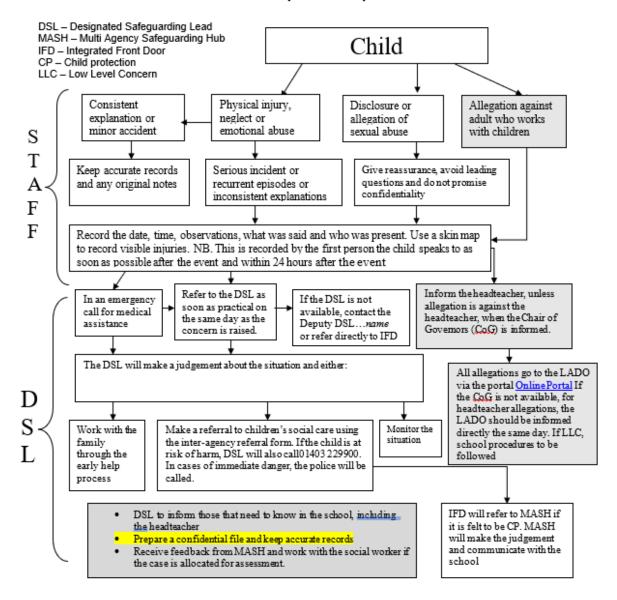
- o If the threshold of significant harm is **not met**, the DSL should either:
 - Actively monitor the situation, or
 - Consider initiating the Early Help process to provide support.

7. Allegations Against Staff

- o In cases of allegations against staff or low-level concerns, the school will follow:
 - West Sussex Safeguarding Children Partnership (WSSCP) procedures, or
 - The school's Low-Level Concerns (LLC) policy, as appropriate.

See Annex 1 Flowchart on the following page

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 – Dealing with Disclosures

General Guidance for All Staff

- Any member of staff who is approached by a child should maintain a positive attitude and try to reassure them.
- **Do not promise complete confidentiality**. Explain that you may need to share information with other professionals to help keep the child or other children safe.
- Confidentiality must always be governed by the need to protect the child.
- Pay special attention to children with communication difficulties or whose preferred language is not English. Communication should always be appropriate to the child's age, understanding, and preferred communication method.
- All staff should know who the **Designated Safeguarding Lead (DSL)** is and who to approach if the DSL is unavailable.
- All staff have the right to make a direct referral to the police or social care if necessary, especially if:
 - o They are the only adult on the school premises.
 - o They have concerns about sending a child home.

Guiding Principles: The Three R's

1. Recognise

- Listen to what is being said without showing **shock or disbelief**.
- Accept what is said and take it seriously.
- Make a note of what was said as soon as practicable.
- Reassure the pupil honestly, but **do not make promises** you may not be able to keep (e.g., "I'll stay with you" or "I'll keep this confidential").
- Appropriate reassurances may include:
 - "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."

2. Respond

- Respond only as far as needed to decide whether a referral is required. Do not interrogate for full
 details.
- Avoid **leading questions** (e.g., "Did he touch your private parts?"). Such questions can invalidate evidence in court.
- Do not ask the child **why** something has happened.
- Do not criticise the alleged perpetrator. The child may care about them.

• Do not ask the pupil to **repeat their disclosure** to another staff member. Instead, explain the next steps and reassure them it will be handled by a senior member of staff.

3. Report

- Share concerns with the **DSL immediately**.
- If the DSL/Deputy is unavailable and the child is at **immediate risk**, contact children's services or the police directly.
- Make **brief notes at the time** and write them up as soon as possible.
- Keep **original notes** on file.
- Record:
 - o Date, time, place, people present.
 - Non-verbal behaviour.
 - The child's exact words (including any "pet" words).
- Use a body map to show any visible injuries.
- Record facts, not interpretations or assumptions.
- Provide **support** for the child: listen, reassure, and be available.
- Maintain **strict confidentiality**, sharing only with appropriate professionals.
- Seek **support for yourself** if needed.
- Remember: Children may not feel ready or know how to disclose abuse, neglect, or exploitation, and may not recognise their experiences as harmful.

Consideration

- Has the action taken led to **positive outcomes** for the child?
- Did the **procedure work** effectively?
- Were there any **deficiencies or weaknesses**? Have these been addressed?
- Is further training required?

What Happens Next?

- Concerns must always be followed up.
- The DSL should inform the reporting staff member of the outcome. If this does not happen, staff should **proactively seek feedback**.
- If concerns are not addressed or the child remains at risk:
 - 1. Ask the DSL to reconsider.
 - 2. If unresolved, follow the school's Whistleblowing procedures.
 - 3. If the DSL is unhappy with Children's Social Care's response, they should use the **WSSCP** escalation protocol (starting with a manager-to-manager discussion).

Supporting Staff After a Disclosure

- Receiving a disclosure can be upsetting. Schools should provide support, which may include:
 - Reassurance that correct procedures were followed.
 - o Recognition that swift action helped safeguard the child.
 - Access to an employee counselling service, if appropriate.

Annex 3 – Allegations Against Adults Who Work with Children

Introduction

There is now a requirement to produce a **Lower Level Concern (LLC) Policy** and process to be set out in existing **Codes of Conduct** and **Safeguarding Policy**. Our Lady of Sion has a LLC policy and the link to report is also given on the Staff Hub for easy access.

Working Together to Safeguard Children (2023) requires organisations to have clear policies for dealing with allegations against people who work with children. These policies should make a clear distinction between:

- Allegations
- Complaints
- Concerns about the quality of care or practice

Allegations (as defined by **KCSiE**) must be reported to the **LADO** (Local Authority Designated Officer). Complaints or concerns can be managed internally under school or college procedures.

Definitions

These are the KCSIE definitions, however Our Lady of Sion School's Headteacher would not deem "shouting, swearing and humiliation of children" as low-level. This would be treated as serious behaviours, contravening the teaching standards/professional conduct expected at Our Lady of Sion School.

Complaints (examples)

- Breaches of the Code of Conduct
- Breach of data protection or confidentiality
- Poor behaviour management
- Inappropriate use of social media
- Misadministration of medication

Concerns (examples)

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

Lower Level Concerns (LLCs)

Concerns that **do not reach the allegation harm threshold** (or complaints criteria) should be addressed under a **school LLC procedure**.

Procedure for Allegations Meeting the Harm Threshold

This procedure applies when it is alleged that a member of staff, supply staff, volunteer, governor, or another adult who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child in a way that indicates they pose a risk of harm
- Behaved in a way that indicates they may not be suitable to work with children

Considerations of Suitability (fourth criterion above)

The LADO will assess allegations of suitability by considering situations such as:

- Parents of children on a CIN Plan or receiving Early Help
- · Arrests for offences against adults
- Concerns presented to other professionals regarding mental health, domestic abuse, or substance misuse
- Extreme political or religious views that may be considered hate crime
- Behaviour in private life that could impact on children

The likelihood and impact of transferable risk to children will determine the LADO's involvement.

Referral Process

- Staff must report concerns about the conduct of any staff member, supply staff, or volunteer to the headteacher immediately.
- Allegations against the headteacher must be reported to the Chair of Governors. If unavailable, the LADO should be contacted directly.
- In cases of immediate risk or possible criminal offences, the police may be contacted immediately.
- On receiving an allegation, the headteacher/Chair of Governors must contact the LADO via the Online
 Portal as soon as possible, before starting any investigation.
- Parents should be informed of the allegation, unless there is a valid reason not to.

In liaison with the LADO, the school will decide how to proceed. If necessary, the LADO may refer to **Children's Social Care** and/or the **police**.

Where information is received from outside agencies, the LADO will assess for transferable risk and disclose information to the school where necessary.

If an allegation is investigated internally, the school will seek guidance from their **HR provider** in line with:

• Keeping Children Safe in Education (2025)

WSSCP procedures

Supply Staff

Although supply staff are not direct employees of the school, the school is still required to:

- Report allegations to the LADO
- Carry out any necessary internal investigation in liaison with an HR representative from the supply agency

Lower Level Concerns (LLCs)

Schools are now required to develop a **LLC Policy** within their **Codes of Conduct** or **Safeguarding Policy**. Our Lady of Sion School has this in place. We have also provided the referral/reporting link to the Staff Hub for ease of access.

Purpose of the LLC Policy

- Encourage an open and transparent culture
- Identify concerning, problematic, or inappropriate behaviour at an early stage
- Empower staff to share LLCs with the DSL
- Manage LLCs internally under school/college procedures

Examples of LLCs

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal mobile phone
- Engaging one-to-one with a child in a secluded area or behind a closed door
- Using inappropriate, sexualised, intimidating, or offensive language

The LLC Policy Will:

- Ensure staff are clear on **appropriate behaviour** and confident in recognising inappropriate conduct in themselves and others
- Empower staff to share low-level safeguarding concerns with the DSL
- Address unprofessional behaviour and support individuals to correct it at an early stage
- Ensure responsive, sensitive, and proportionate handling of concerns
- Help identify weaknesses in the school/college safeguarding system

In Line with the LLC Policy:

- All LLCs must be shared with the DSL, recorded in writing, and managed appropriately and promptly
- All LLCs will be **reviewed** to identify any patterns of problematic behaviour
- Where LLCs escalate to the harm threshold, a referral will be made to the LADO

Where doubt exists, the school will seek LADO advice

Annex 4 – Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

Child-on-Child Abuse: Policy for Staff. Our Lady of Sion School has also written Child-On -Child policies for Junior School Children and Senior School Students. Those policies are shared with the children through PSHEE lessons or during Tutor/Class Teacher time close to the beginning of an academic year and reinforced throughout the academic year.

1. Context

This policy sets out how staff should respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including incidents that:

- Occur outside of school or college premises; and/or
- Take place online.

All staff are expected to maintain an attitude of:

"It could happen here."

Failure to recognise, acknowledge, or understand the scale of harassment and abuse—or downplaying certain behaviours—creates a culture of unacceptable behaviour and unsafe environments. In the worst cases, this can **normalise abuse**, leading children to accept it as routine and not come forward to report it.

- Sexual violence and sexual harassment can occur between two children of any age and sex.
- It may also occur through a group of children sexually assaulting or harassing a single child or group.
- Victims often find the experience stressful and distressing, which can affect educational attainment and emotional well-being.
- Sexual violence and harassment exist on a continuum, may overlap, and can occur online or offline (verbal, physical, written, visual).
- Such behaviours are never acceptable.

It is essential that:

- All victims are taken **seriously** and offered appropriate **support**.
- Perpetrators are recognised as they may themselves also be victims of abuse.
- Victims are protected, their education not disrupted, and the wider school community supported.

2. Policy Statement

- All children have the right to attend school and learn in a safe environment.
- Children must be free from harm by adults and by other children.
- We recognise that children are capable of abusing their peers. Such behaviour will be dealt with under our Child Protection Policy and in line with KCSiE (2025).
- We adopt a **zero-tolerance approach** to sexual violence and sexual harassment.

Sexual violence and sexual harassment:

- Are never acceptable.
- Will never be tolerated.
- Are not an inevitable part of growing up.

3. Prevention

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

- Taking a **whole-school approach** to safeguarding and child protection.
- Providing training to staff.
- Establishing a **clear set of values and standards**, underpinned by the Behaviour Policy, pastoral support systems, and planned curriculum.
- Engaging with specialist support and interventions.

4. Responding to Reports

When responding to reports of sexual violence or sexual harassment:

- All reports will be taken seriously. Victims will be kept safe and supported.
- The **initial response** is vital—it can either encourage or undermine victims' confidence in reporting.
- If the report includes an **online element**, staff will follow *Searching, Screening and Confiscation: Advice for Schools (DfE 2022)*.
- The staff member receiving the report will:
 - o Inform the **DSL (or Deputy)** within 24 hours.
 - o Never promise confidentiality.
- Parents/carers will normally be informed unless this would put the child at greater risk.
- If a child is at risk of harm, in immediate danger, or has been harmed, a referral will be made to Children's Social Care (01403 229900).

5. Risk Assessment

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

The assessment will consider:

- The victim (protection and support needs).
- The alleged perpetrator (support needs, disciplinary actions).
- Other children at the school.
- Issues relating to shared classes and school spaces.

The assessment will be:

Recorded and kept under review.

Informed by any specialist or external professional assessments.

6. Action

When determining next steps, the DSL will consider:

- The wishes of the victim.
- The nature and seriousness of the incident.
- Whether a crime has been committed.
- Age and developmental stage of those involved.
- Any power imbalance.
- Any previous incidents.
- On-going risks and wider context.

Options for Action:

- Manage internally.
- Refer to Early Help.
- Refer to Children's Social Care.
- Report to the **police** (generally alongside Social Care referral).

7. Ongoing Response

- All concerns, discussions, decisions, and rationales must be recorded in writing.
- Records will be reviewed to identify any patterns of concerning behaviour.
- The DSL will manage reports case by case, keeping the risk reduction plan under review.

If a criminal investigation is underway:

- The alleged perpetrator will be removed from shared classes with the victim.
- Consideration will be given to how to separate victim and perpetrator on school premises and transport.

If conviction/caution is received:

- For **rape or assault by penetration**: In almost all cases, the perpetrator will not be allowed to remain in the same school.
- For **sexual assault**: Appropriate sanctions (including possible exclusion) will be applied.

Support:

- Victims, perpetrators, and witnesses will be offered appropriate support.
- Victims may be offered a **trusted adult of their choice** for ongoing support.
- Disciplinary action against perpetrators will be in line with the **Behaviour Policy**.

8. Unsubstantiated, False or Malicious Reports

- If unsubstantiated, unfounded, false or malicious: consider whether the child who reported is in need of help or at risk of abuse.
- If deliberately invented or malicious: consider disciplinary action under the Behaviour Policy.

9. Physical Abuse

While this policy focuses on sexual abuse and harassment, staff should note:

- Physical assaults, initiation violence, or rituals may also be abusive.
- These will not be tolerated.
- Where a crime is believed to have been committed, the police will be informed.
- Anti-bullying policy principles will apply, recognising that a police investigation will take priority.

10. References

• Keeping Children Safe in Education (DfE, 2025)

Annex 5 – Online Safety and Artificial Intelligence (AI)

Our Lady of Sion School has a Safe Use of Artificial Intelligence (AI) Policy

Introduction

As a school/college, it is essential that we safeguard children, young people, and staff 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.
- Identify, intervene, and escalate concerns where appropriate.

Categories of Online Risk

The breadth of online safety issues is considerable, but risks can be categorised into four key areas:

1. Content

Exposure to illegal, inappropriate, or harmful material such as:

- Pornography
- Fake news
- o Racism, misogyny, anti-Semitism
- Self-harm, suicide material
- Radicalisation and extremism

2. Contact

Harmful online interactions with others, including:

o Peer-to-peer pressure

- Commercial advertising
- Adults posing as children/young adults to groom or exploit for sexual, criminal, financial, or other purposes

3. Conduct

Personal online behaviours that increase the likelihood of harm, such as:

- o Creating, sending, or receiving explicit images (consensual or non-consensual)
- Sharing pornography or other explicit images
- Online bullying

4. Commerce

Risks including:

- o Online gambling
- o Inappropriate advertising
- o Phishing and financial scams

Where pupils, students, or staff are at risk, reports will be made to the Anti-Phishing Working Group.

Safeguarding Framework

- Online safety is embedded across all relevant school/college policies and procedures.
- Appropriate **filtering and monitoring** systems must be in place on all school devices and networks.
- Staff training will include understanding responsibilities in relation to filtering and monitoring.
 - o Reference: *DfE Guidance Appropriate Filtering and Monitoring, UK Safer Internet Centre*.

Cyber Security

- Education settings must ensure they have the appropriate **security protection procedures** in place to safeguard systems, staff, and learners.
- Effectiveness of cyber-security procedures will be reviewed regularly to keep pace with evolving cybercrime technologies.
- Guidance available:
 - National Education Network e-security
 - Cyber security standards for schools and colleges GOV.UK
 - Cyber security training for school staff NCSC.GOV.UK

Curriculum and Leadership

- Online safety will be reflected in all relevant policies.
- It will be embedded across the curriculum and teacher training.
- The Designated Safeguarding Lead (DSL) will have explicit responsibilities in relation to online safety.
- Parents will be engaged in discussions about safe technology use.

Legislative Context

Online Safety Act 2023

- Introduces new legal duties for social media companies and search services.
- o Makes providers more responsible for users' safety.
- Requires providers to reduce risks of illegal activity and remove illegal content swiftly.
- o Reference: Online Safety Act: explainer GOV.UK.

Artificial Intelligence (AI)

- The Department for Education has published:
 - Generative AI: product safety expectations GOV.UK
 - Using AI in education settings: support materials GOV.UK
- Key expectations for schools:
 - AI must be used safely and responsibly.
 - o Filtering and monitoring requirements apply to AI use in education.
 - o Generative AI should be considered within safeguarding, data protection, and teaching policies.

Annex 6 – Whistleblowing in a Safeguarding Context

Purpose

Every school must have a whistleblowing procedure. These procedures protect staff members who report colleagues they believe are:

- Acting illegally,
- · Neglecting their duties, or
- Behaving in a way that places children at risk.

This annex does **not** replace the school's wider whistleblowing policy. It should be read **in conjunction with the school's policy**.

Scope

- The whistleblowing policy is **not designed** for concerns that fall under statutory safeguarding procedures (e.g., child protection concerns or allegations against staff).
- Such concerns must be reported under the relevant safeguarding or child protection procedures.
- However, whistleblowing will apply if there is good reason to believe that the **relevant safeguarding procedure is not being followed**, or will not be followed effectively.

Reporting Concerns

Within School

- At Our Lady of Sion School, the Headteacher Mr Steven Jeffery is the senior manager responsible for all staff.
- If you are concerned that any staff member is not following safeguarding processes, or is behaving in a way that places children at risk, you should make the **Headteacher** aware.

Concerns About the Headteacher

- If your concern relates to the Headteacher, you should raise this directly with the Chair of Governors.
- Contact method: [Insert process to contact Chair of Governors or equivalent].

Outside of School

If you would prefer to raise your concerns externally, you may contact:

- Children's Social Care 01403 229900
- Local Authority Designated Officer (LADO) via the Local Authority Online Portal

Annex 7 – Briefing Sheet for Temporary and Supply Staff

This information is kept in school offices (Senior and Junior School) along with copies of the latest Safeguarding and Child Protection Policy. The briefing sheet must be handed to all temporary and supply staff.

For Supply Staff and Short-Term Contracts at Our Lady of Sion School

While working at **Our Lady of Sion School**, you have a **duty of care** towards the children and young people in our care. This means you must always act in a way that is consistent with their **safety and welfare**.

If at any time you have a concern about a child or young person—particularly if you believe they may be at risk of abuse or neglect—it is your responsibility to share that concern with the Designated Safeguarding Lead (DSL):

- **DSL Name:** Mr Steven Jeffery (also Headteacher)
- Location: Headteacher's Office, Senior School Campus (near Reception)
- If the DSL is unavailable: Contact the Deputy DSL, Miss Helen Davis (Deputy Headteacher)
- Alternatively: Report to School Reception and inform the staff you need to raise a safeguarding concern; they will direct you to the appropriate person.

Situations That May Cause Concern

You may become concerned due to, but not limited to:

- Observing a **physical injury** that may be non-accidental.
- Noticing aspects of a child's **appearance** suggesting they are not being sufficiently cared for.
- Observing **child behaviour** that raises concern.
- A child **disclosing abuse** or neglect to you.

• Observing adult behaviour that raises concerns about their suitability to work with children.

Reporting Procedures

- Write down what you saw or heard.
- Include dates, times, and anyone else present.
- Sign your record.
- Give it to the **DSL** as soon as possible and no later than 24 hours.

Note: Your written account may become part of a legal process. Avoid influencing the child's account in any way.

If a Child Discloses Abuse

Follow these guidelines:

- Listen and be supportive, do not directly question the child.
- Do not stop a child who is freely recalling events, but **do not push them** to provide more than they wish.
- **Do not promise confidentiality**. Make it clear that information may need to be shared with other professionals.
- Write a detailed account immediately, as close to verbatim as possible, including date, time, and witnesses. Sign it and give it to the DSL.

The DSL will follow due process, including contacting Children's Social Care if appropriate.

Additional Notes

- The school's **Safeguarding Policy**, including local procedures for all staff, is available at: www.sionschool.org.uk
 - Alternatively, a copy is available from the School Reception Office (Senior School) or School Office (Junior School).
- If your concern involves a **member of staff**, report it to the **Headteacher** and consider contacting the **LADO via the Online Portal**.
- If the concern involves the **DSL or Headteacher** (for 2025/2026, the DSL is the Headteacher), please contact the **Chair of Governors, Mrs Katy Henwood**, or the **LADO**.
 - o The Chair of Governors' contact details can be found on the **school website**.

Remember:

If you have a concern, report it.

Annex 8 - What is Child Abuse?

The following definitions are taken from *Working Together to Safeguard Children* (HM Government, 2023). Children can also be abused through **sexual exploitation**, **honour-based violence**, **forced marriage**, **or female genital mutilation**. Staff have access to the **WSSCP Threshold Chart**: <u>WSSCP Thresholds</u>.

Abuse and Neglect

Abuse and neglect are forms of **maltreatment of a child**. A child may be abused by inflicting harm, or by failing to act to prevent harm. Abuse can occur:

- Within a family
- In an institutional or community setting
- By someone known to the child, or rarely, by a stranger
- Perpetrated by adults or other children

Types of Abuse

Physical Abuse

- Hitting, shaking, throwing, poisoning, burning/scalding, drowning, suffocating, or other physical harm
- Fabricating or inducing illness in a child

Indicators:

- Multiple or clustered bruises (head, face, neck, back, chest, buttocks, thighs)
- Bite marks, burns, scalds, untreated injuries
- Bald patches or recurrent injuries
- Injuries inconsistent with explanation

Concerning behaviour in children:

- Reluctance to go home, aggression, flinching, wearing long sleeves in hot weather
- Fear of medical help, excessive punishment admission

Emotional Abuse

Persistent emotional maltreatment causing severe adverse effects on a child's development.

Examples:

- Conveying that a child is worthless, unloved, or inadequate
- Overprotection, limiting exploration, or preventing social interaction
- Serious bullying (including cyberbullying)
- Witnessing domestic violence

Indicators:

Developmental issues:

- Delays in physical, mental, and emotional development
- Poor school performance, speech disorders

Behavioural issues:

- Over-reaction to mistakes, continual self-deprecation, self-harm, drug/solvent abuse
- Running away, compulsive stealing, acting out, regressive behaviour
- Eating disorders, destructive tendencies, poor trust in adults

Social issues:

Withdrawal, over-compliance, insecure or clinging behaviour, poor peer relationships

Emotional responses:

Extreme fear, self-disgust, low self-esteem, lack of concentration, aggression or passivity

Sexual Abuse

Involves forcing or enticing a child into sexual activities, whether or not they are aware.

Examples:

- Physical contact: rape, oral sex, masturbation, kissing, touching outside clothing
- Non-contact: viewing/producing sexual images, encouraging sexual behaviour, grooming online

Indicators:

Physical observations:

- Damage to genitalia, anus, or mouth
- STIs, unexpected pregnancy, soreness, recurrent UTIs

Behavioural observations:

- Age-inappropriate sexual knowledge or behaviour
- Sexualised behaviour, promiscuity, hints at sexual activity
- Depression, personality changes, poor concentration, social withdrawal
- Acting out, regressive behaviour, wetting, nightmares
- Suicide attempts, self-mutilation, sudden drawing of sexual images
- Over-compliance, fear of clothing removal, perfectionism

Note: Sexual abuse can be perpetrated by both adults and children, male or female.

Neglect

Persistent failure to meet a child's basic physical and psychological needs, likely causing serious harm.

Examples:

- Failing to provide adequate food, clothing, shelter
- Failing to protect from harm, ensure supervision, or provide medical care
- Emotional neglect or unresponsiveness

Indicators:

Physical:

• Constant hunger, poor hygiene, unsuitable clothing, untreated illness

Behavioural:

• Frequent absence, unsupervised, stealing, scavenging, destructive tendencies

Social/Emotional:

• Isolated, withdrawn, difficulties making friends, developmental delays

Note: Neglect is often subtle but very damaging. Early intervention can prevent escalation.

Key Points

- Abuse can occur in combination (neglect, emotional, physical, sexual)
- Indicators alone cannot confirm abuse; always consider the child's context
- If unsure or concerned do something. Don't keep it to yourself
- Use WSSCP neglect toolkit for detailed indicators

Approved by Board of Governors September 2025

Key Safeguarding Personnel & Contacts – Our Lady of Sion School

Role	Name(s)	Contact Details
Designated Safeguarding Lead (DSL)	Mr Steven Jeffery (Headteacher)	01903 204063
	Miss Helen Davis (Senior School)	01903 204063
Deputy DSL(s)	Mrs Maria Manco (Junior School)	01903 204062
	Mrs Sarah Summers (Junior School)	01903 204062
School's Named Prevent Lead	Mr Steven Jeffery	01903 204063
School Mental Health Lead	Mr Steven Jeffery	01903 204063
	Mr Steve Danes	01903 204063
Mental Health First Aiders / Pastoral Leads	Mrs Vicky Hoarty Mrs Peri Kirk (Known and Nurtured	01903 204063
	TA, Junior School)	01903 204062
Nominated Safeguarding Governor	Dr Sue Coldwell	coldwells@sionschool.org.uk
Chair of Governors	Mrs Katy Henwood	henwoodk@sionschool.org.uk

External Safeguarding Contacts

Agency / Service	Contact Details	
Integrated Front Door (West Sussex)	01403 229900	
Safeguarding in Education Team	Sally Arbuckle (Manager), Gabby Rodrigues, Natasha Cherryman, Sarah Young Tel: 0330 222 4030 Email: safeguarding.education@westsussex.gov.uk	
Police	Dial 101 (non-emergency) Dial 999 (emergency only)	
Local Authority Designated Officers (LADOs)	Miriam Williams, Donna Tomlinson, Vic Williams Contact via Online Portal	