

# Safeguarding Policy

## 2025-2026

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Seaford College

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## Introduction

1. This policy has been authorised by the College Governing Board, is addressed to all members of staff, is available to all parents and is posted on the College's website. It applies to the Headmaster and all staff, Governors, volunteers and others coming into regular contact with pupils. The policy has been developed in accordance with the principles established by the Children Act 1989 and Education Act 2002 and in line with the following publications:

- a. "Working Together to Safeguard Children" 2023
- b. The National Minimum Standards for Boarding Schools (Standard 11) 2002, revised 2022.
- c. "Keeping Children Safe in Education" (DfE) 2025
- d. "Disqualification under the Childcare Act" 2006, revised 2018
- e. "What to do if you're worried a child is being abused" 2015
- f. "Information sharing" 2018
- g. "Teacher misconduct: the prohibition of teachers" 2018
- h. "The Prevent Duty", part of the Counter Terrorism and Security Act 2015
- i. "The Prevent Duty Guidance: guidance for specified authorities in England and Wales" 2023
- j. "The use of social media for on-line radicalisation" 2015
- k. "When to call the police" (non-statutory guidance from the National Police Chief's Council)
- l. "Coronavirus (COVID-19): safeguarding in schools, colleges and other providers" 2020, subject to DfE updates.
- m. "Safeguarding and remote education during coronavirus (COVID-19).
- n. "Schools COVID-19 Operational Guidance" (August 2021)
- o. "Relationships Education, Relationships and Sex Education (RSE) and Health Education" (2019, updated 2021)
- p. "Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers" (July 2018)
- q. Statutory guidance "PACE Code C" (2019)
- r. "Filtering and Monitoring Standards" (DfE) 2023

## Development of Policy

2. This Safeguarding Policy is in accordance with local agency policies and we engage in early action with such agencies when the need arises. The policy and the efficiency with which the related duties are discharged, will be reviewed annually by the College Governing Board. Should any deficiencies in this Policy be brought to the attention of the College Management or Governing Board, these deficiencies will be remedied without delay.

## Rationale

3. The school is a key front-line player, working in partnership with other children services and staff should always be mindful of local policies that must be followed, and which are under the direction of the West Sussex Safeguarding Children Partnership.

4. Increasingly, schools are expected to work with, and support, different agencies to enable the most appropriate form of intervention to take place. This Policy aims to outline the role of the

College, the procedures that staff should follow and guidance on issues related to safeguarding generally and promoting the welfare of children. It is not exhaustive – all staff should use as a rule of thumb the safety and needs of the child as being at the centre of any decision they may need to take. All members of staff should be aware of the College Whistleblowing Policy and understand that they should be confident that they can raise any matters of genuine concern without fear of reprisals in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

## **Aims**

5. We believe that Seaford College should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. With that in mind the aims of this policy are:

- a. To support the child's development in ways that will foster security, confidence and independence and to promote the child's welfare.
- b. To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- c. To raise awareness in all staff, both teaching and non-teaching, of individual responsibilities in identifying and reporting cases and possible cases of abuse to the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads, the Headmaster or the Chairman of Governors, as appropriate.
- d. To maintain a system of effective communications and a systematic means of monitoring, reporting and recording of concerns.
- e. To promote a structured procedure within the school for members of the community to follow in cases of suspected abuse.
- f. To maintain a system of monitoring of those thought to be at risk of harm, and to ensure that we, the College, contribute to assessments of need and support packages for those children.
- g. To promote links with other agencies such as Social Care and the Police with a view to developing a productive and effective partnership.
- h. To ensure that all adults within our school who have substantial access to children have been checked as to their suitability.
- i. To ensure that any member of another organisation, if responsible for the College's pupils at any time, has had the appropriate checks.
- j. To develop further a network of support for staff and pupils.
- k. To provide guidance on recognising and reporting suspected child abuse, including recognising suspected child-on-child abuse.

## **The Role of the Governing Board and the Designated Safeguarding Leads**

6. Mrs J. Forman is the College's Designated Safeguarding Lead (DSL) with Mrs S. Adams, Mr W. Yates, Mr G. Vernon and Mr M. Earle being the College's Deputy Designated Safeguarding Leads (DDSLs). Mrs Forman, is a member of the College's Senior Management Team. In their absence the Headmaster, John Green, should be approached. The member of the College Governing Board responsible for safeguarding is Victoria Padgham, although safeguarding is

the responsibility of the Governing Board as a whole. The Governing Board should help to facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. All systems, processes and policies should operate with the best interests of the child at heart. Our DSL and DDSs have undertaken the initial designated member of staff training and subsequent refresher courses when required (on a two-yearly cycle) delivered through the Safeguarding Unit, including child protection and inter-agency working, participation in child protection case conferences, supporting children in need, record keeping and promoting a culture of listening to children. The Governing Body will take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.

In addition, the Governing Body will ensure that:

- Safeguarding files are maintained as set out in Annex C of KCSIE 2025.
- Appropriate safer recruitment policies, in accordance with Part 3 of KCSIE 2025 are in place, embedded and effective and
- Where reasonably possible that the College holds more than one emergency contact number for each student.

7. The Designated Safeguarding Lead has the responsibility of:

- a. Maintaining an overview of safeguarding within the College.
- b. Ensuring that effective communications and liaison with Social Care and other agencies take place as appropriate in the event of staff having safeguarding concerns about a child or young person, and to make a referral where appropriate.
- c. Ensuring that the Headmaster, and all staff, members of the College Governing Body and others have regular training (including regular updates in line with WSSCP advice and other changes in requirements) on child abuse and its main indicators and that they are aware of their own child protection responsibilities and those of the College. Any volunteers, or temporary staff, will be made aware of child protection arrangements and will also undergo appropriate training. This includes ensuring, along with the Headmaster, that all staff have read and understood Part 1 or Annex A (for those staff who do not work directly with children) of Keeping Children Safe in Education and being updated on any changes when these are introduced. If any updates are made to KCSIE all staff must be updated.
- d. Ensuring that all new members of staff, new Governors and those engaged to work at the school receive appropriate safeguarding and child protection training (including online safety) at induction, and that online safety training is provided as part of the regular updates. This training will include being given and reviewing copies of the Safeguarding Policy, the Staff Code of Conduct and Whistleblowing Policy, the Acceptable Use for Mobile Devices Policy, the Internet Acceptable Use Policy, the Pupil Behaviour Policy, the Children Missing Education Policy and Keeping Children Safe in Education (Part 1 or Annex A) and an introduction to the Designated Safeguarding Leads so that they be easily identified. All teaching staff will also complete the Channel training, whilst support staff will receive training on Prevent from the DSL.
- e. Ensuring that the DSL, DDSs and the School Governing Body member responsible for Safeguarding are properly trained and re-trained on a two-yearly cycle (or more frequently, including updates, as required), including inter-agency working protocols and training in the WSSCP's approach to Prevent duties. The training that the DSL requires is set out in Annex B of Keeping Children Safe in Education.

- f. Reviewing annually the Safeguarding Policy and the efficiency with which related duties have been discharged.
- g. Ensuring that where the school ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a detailed report is made to the Disclosure and Barring Service (DBS) within one month of the person leaving the school. The School Governing Body have noted that failure to make a report constitutes an offence which may result in the school being removed from the register of independent schools.
- h. Providing, with the Headmaster, regular updates on child protection issues, training and changes in safeguarding policy and procedure.
- i. Liaising with the Headmaster to inform him of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement to have an Appropriate Adult. Further information can be found in the Statutory guidance – PACE Code C 2019.
- j. Providing the Headmaster and the Governing Board with an annual update and review of the effectiveness of procedures and their implementation. The Governing Board will also ensure that the College contributes to interagency working, in line with Working Together to Safeguard Children, through effective communication and good cooperation with local agencies. The annual report to the Governing Board will be minuted.

8. The Designated Safeguarding Lead will:

- a. Arrange to provide safeguarding training on a regular basis to all members of staff, as well as training any volunteers or temporary members of staff, in line with advice from West Sussex Safeguarding Children Partnership (WSSCP). This will include Prevent training and training in on-line safety. This will be supplemented by regular informal updates, which will take place at least annually.
- b. Support, advise and liaise with staff in their safeguarding work.
- c. Ensure that any child who is subject to a child protection plan who is absent without explanation for two days is referred to their key Social Care Team.
- d. Liaise with, when appropriate (e.g. if the allegation is against the Head or the Designated Member of Staff), the Chairman of Governors and/or the Governing Board member responsible (see procedures below).

### **Safer Recruitment Training**

9. The College will operate safe recruitment procedures as outlined in the guidance “Safeguarding Children and Safer Recruitment in Education”. It will check all staff, Governors, volunteers and others coming into regular contact with children to ensure their suitability. This includes checks on identity, qualifications (where appropriate), Disclosure and Barring Service (DBS) history, the right to work in the UK, references, employment history, medical fitness and overseas checks for those appointed from overseas. The College will also ensure that at least one member of each interview panel has completed the Safer Recruitment course.

If a member of staff needs to start work before a DBS check has completed this can only happen following a Barred List check (where required) and risk assessment, which will be signed off by the Headmaster.

For further detail please see the College's Safer Recruitment Policy.

### **Forms and Signs of Abuse**

10. Child abuse is a term used to describe ways in which children are harmed, often by someone in a position of power. Somebody may abuse or neglect a child by inflicting harm, or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. It is not the College's responsibility to investigate (nor must they) whether abuse is occurring, but we are required to act on any concerns and report them to the appropriate parties. The health, safety and protection of the child must be paramount. It is important that College staff recognise that abuse may take part in a number of ways and that abusers can be of any age and either male or female.

11. Child abuse can take a number of forms, all of which can cause long term damage to a child including physical abuse, emotional abuse, neglect, child sexual abuse, bullying, child sexual exploitation (CSE) (see sections 24-31), exposure to extremism (see sections 92-102), female genital mutilation (FGM) (see sections 32-36), drugs, induced illness, youth produced sexual imagery (see sections 19-23) and children missing education (see separate policy). It should be noted that upskirting (the taking of taking a sexually intrusive photograph up someone's skirt without their permission) became illegal under the Voyeurism Offences Act 2019 on 12<sup>th</sup> April 2019. Domestic abuse (see section 37) can also be a form of child abuse, probably falling under emotional abuse. Abuse can take place wholly online, or technology may be used to facilitate offline abuse (see the College Internet Acceptable Use Policy and Acceptable Use Policy for Mobile Devices). It should be noted that those with special educational needs and/or disabilities can be particularly vulnerable to abuse of all types.

12. Such abuse can translate itself into many forms – for example, the child's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the child's behaviour.

13. Emotional abuse is the persistent ill treatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. It can include

- Conveying to a child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.
- Not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Placing inappropriate age-related expectations on children, including interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning. It may also include preventing the child participating in normal social interaction.
- Making a child feel frightened or in danger on a frequent basis or the exploitation or corruption of a child.
- A child seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying).

Signs of possible emotional abuse might include very low self-esteem, continual self-depreciation, fear of new situations, inappropriate emotional responses to a painful situation, self-harm, compulsive stealing, drug abuse, neurotic behaviour, eating problems, abnormal attachment between child and parent, aggressive behaviour towards others, attention-seeking behaviour and being withdrawn and socially isolated – often known as 'frozen watchfulness'. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

14. Sexual abuse involves forcing or enticing a child 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 can also include non-contact activities such as involving children in looking at, or 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 can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (a type of child-on-child abuse).

Signs of possible sexual abuse might include explicit or frequent sexual preoccupation in talk and play, sexualised behaviour or sexually provocative behaviour with adults, self-harm and an anxious unwillingness to remove clothes for sports etc. Other possible signs might include scratches, abrasions or persistent infection in the anal passage, pregnancy, frequent (public) masturbation, attempts to teach others about sexual activity, withdrawal from friends and aggressiveness, anger, anxiety or tearfulness.

15. Physical abuse can include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or causing any form of physical abuse 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.

Signs of possible physical abuse might include unexplained bruising or injury, including cigarette burns, bites, scalds and burns (especially to parts of the body where accidents are unlikely, such as thighs, back and abdomen). Signs of physical abuse can also be seen in behaviour and might include being sad, withdrawn or depressed, displaying untreated injuries or lingering illness, admission of punishment which seems excessive, shrinking from physical contact, having trouble sleeping, being aggressive or disruptive, showing fear of certain adults and fear of returning home or parents being contacted, fear of undressing or of medical help, over compliant behaviour, running away, deterioration in work, unexplained patterns of absence, having a lack of confidence or low self-esteem and use of drugs or alcohol.

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

Possible signs of neglect might include being unkempt, having an uncared for appearance or having poor personal hygiene, being undernourished, underweight or constantly hungry, being poorly clothed for example with inadequate protection from the weather, having unexplained absence from or being frequently late to school, having untreated medical problems, being constantly tired and being regularly left alone, or in charge of younger brothers or sisters.

17. Of course all of the above may be apparent for a reason not connected in any way to abuse but they are all symptoms of possible abuse.



18. Bullying is a form of child abuse. It can be defined as using deliberately hurtful behaviour, usually over a period of time, where it is difficult for those being bullied to defend themselves. Main types of bullying include:

- Physical
- Verbal
- Emotional
- Cyber

All incidents of bullying must be reported to the Headmaster or the Deputy Head and will be recorded in the bullying incident log held by the Deputy Head. A more detailed guide can be found in the College's Anti-Bullying Policy.

### **Online Safety and Youth Produced Sexual Imagery**

19. The breadth of issues classified within online safety is considerable and ever evolving, 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, anti-Semitism, radicalisation, extremism, 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 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.

20. Making, possessing and distributing sexual photos and videos of anyone under the age of 18 is illegal. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) and as amended in the Sexual Offences Act 2003 (England and Wales). The sharing of nude and semi-nude images/videos can be a sign that a child is at risk of harm. The sharing of consensual nude or semi-nude images/videos of anyone under the age of 18 may not be abusive but is illegal whilst the sharing of non-consensual nude or semi-nude images/videos of anyone under the age of 18 is both illegal and abusive.

21. When an incident involving youth produced sexual imagery comes to the College's attention the following steps will be taken:

- The incident should be referred to the DSL or a DDSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the children involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is a good reason to believe that involving parents would put the child at risk of harm
- At any point in the process, if there is concern a child has been harmed or is at risk of being harmed, a referral should be made to children's social care and/or the police immediately.

22. Adults should not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible responses to incidents should be based on what the DSL has been told

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about the content of the imagery. The decision to view imagery should be based on the professional judgement of the DSL (together with the DDSLs) and should always comply with the College's Safeguarding Policy and Procedures.

23. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the child. Further details on searching, deleting and confiscating devices can be found in the DfE Searching, Screening and Confiscation advice. This advice highlights that all schools have the power to search pupils for devices, search data on devices and delete youth produced sexual imagery. Viewing youth produced sexual imagery can be distressing for both children and adults and appropriate emotional support may be required.

24. If any devices need to be seized and passed onto the police, then the device(s) should be confiscated and the police should be called. The device(s) should be turned off and placed under lock and key until the police are able to come and retrieve it/them. For further advice see "Searching Screening and Confiscation Advice" (DfE) and "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (UKCIS Education Group).

### **Child Sexual Exploitation and Child Criminal Exploitation**

25. Child criminal exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Criminal Exploitation**

26. Some specific forms of CCE can include children being forced or manipulated into trafficking drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

27. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm that they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

28. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

## **Child Sexual Exploitation**

28. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example rape, or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

29. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

30. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

31. Further information about CSE including definitions and indicators is include in Annex B of KCSIE 2025.

### **Honour Based Violence, Female Genital Mutilation and Forced Marriage**

32. Honour based violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast-ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

33. If any member of staff has a concern regarding a child that might be at risk of HBV, or who has suffered from HBV, they should speak to the DSL (or a DDSL).

34. Professionals in all agencies, and individuals and groups in relevant communities need to be alert to the possibility of a girl being at risk of Female Genital Mutilation (FGM), or having already suffered FGM. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Victims of FGM are likely to come from a community that is known to practise FGM. Girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. If you discover that a case of FGM appears to have been carried out it is mandatory (there is a statutory duty) to report this to police. You should, however, consider and discuss such a case with the DSL, involving children's social care where appropriate.

35. Forcing a person into marriage is a crime in England. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning difficulties, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are

not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

If any member of staff has a concern about a potential forced marriage, they can contact the Forced Marriage Unit (FMU) on 020 7008 0151 or [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk).

36. If any student goes missing or is believed to have 'run away', the protocol in the College's Missing Pupil Policy should be followed. If students are absent from school without authorisation for a period of five days or more the Children Missing Education Policy should be referred to and the Local Authority contacted.

### **Domestic Abuse**

37. Domestic violence and abuse is defined as "any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial and
- Emotional

Exposure to domestic abuse and or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting children and young people can also occur within their personal relationships, as well as in the context of their home life.

If any member of staff has any concerns about this, they should contact the DSL or a DDSL.

### **Serious Violence**

38. All staff should be aware of the indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from College, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

### **Mental Health Issues**

39. We recognise the safeguarding risk presented by mental health issues such as eating disorders, anxiety disorders and persistent low mood. Staff should report potential concerns about a child's mental health to the DSL or one of the DDSLs. The DSL or DDSL will liaise, as appropriate, with the child's parents, the wider pastoral team, and with the College Nurse when concerns are reported about a child's mental health, to decide on appropriate actions which may include referral to the GP, the College counsellor, CAMHS and/or local authority children's social care, as appropriate. Children

experiencing mental health difficulties are monitored by the Pastoral Team at its weekly meeting to enable joined-up decisions about support, onward referrals and other actions.

40. Staff should also 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.

41. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Teachers and staff working at the College, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

### **Self-Harm**

42. Whilst self-harm is not classed as child abuse it can be a sign that a child is being abused. If it comes to the attention of member of staff that a child is self-harming they should alert the DSL or a DDSL. Actions by the DSL or DDSL might include:

- Contacting parents
- Contacting Child Adolescent Mental Health Service (CAMHS)
- Contacting Social Care if the child meets the referral criteria

The College has a separate Self-Harm Policy, which is published on the College Website.

### **Children who are Absent from Education**

43. Children being absent from education for prolonged periods and/or on repeat occasions and/or for unexplainable reasons can act as a vital warning sign to a range of safeguarding issues including neglect, CSE and CCE – particularly county lines. It is important the College's response to persistently absent students and children missing education supports identifying such abuse, and in the case of absent students helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child in need or who has a child protection, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Please see the College's Children Missing Education Policy for further information.

Statutory guidance on school attendance: <https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

### **Procedures if a Member of Staff, or Any Other Adult, is Concerned About a Child**

44. All members of staff, volunteers and Governors must know:

- a. The signs and symptoms of abuse.
- b. How to respond to a pupil who discloses abuse.
- c. What to do if they are concerned about a child.

45. A member of staff aware of (either by disclosure or otherwise) or suspecting abuse, or is concerned about a child in need:

- a. must listen carefully to the child, be supportive and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place.
- b. must respond in a calm and non-judgemental way, asking questions which are open-ended e.g. is there anything else you want to tell me? Yes? And?
- c. should not ask leading questions, that is, a question which suggests its own answer. Use words: 'Tell', 'Explain', 'Describe', never 'Why'. If at all possible the questions asked should be recorded. The member of staff should not lay blame or criticise either the child or the perpetrator.
- d. should observe any bruises but should not ask a child to remove or adjust their clothing to observe them
- e. must reassure the child, but never give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the DSL or a DDSL who will ensure that the correct action is taken.
- f. must keep a sufficient written record of the conversation. This should be done immediately. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. Include any observations on noticeable non-verbal behaviour and actual words used by the child. The record should be placed on CPOMS the person making it and should use names, not initials.
- g. must send the notes and records immediately to a DSL, a DDSL, the Headmaster or the Chairman of Governors, as appropriate (all notes and records should go the DSL or DDSL, unless there is an allegation against a member of staff (in which case the notes and records should be sent to the Headmaster) or unless there is an allegation against the Headmaster (in which case the notes and records should be sent to the Chairman of Governors).
- h. must complete a body map (available in No. 46) for any injuries or bruises observed, which should be handed in with the notes of the concern/disclosure
- i. should speak to the DSL or a DDSL about any concern about a child – any concerns, either not meeting the threshold for a referral, or not being referred on the advice of the LADO, will be recorded on CPOMS.
- j. all staff should reassure victims of abuse that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

46. All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, and computers), must be safeguarded and preserved.

47. Any person can make a referral to external agencies including the local safeguarding board and the police if they have any concerns about a child (as opposed to a child being in immediate danger). It is recommended, however, that staff take advice from the DSL or a DDSL who have experience and expertise in this area. Contact numbers for the West Sussex Safeguarding Children Partnership, IFD (Integrated Front Door) and the LADO are at the end of this policy, as is the link to the online referral tool for reporting child abuse to your local council (which directs staff to their local children's social care contact). The contact number for the NSPCC Whistleblowing helpline is also included at the end of this policy.

48. Any member of staff who believes that a child is in immediate danger or is at risk of harm should make a referral to children's social care and/or the police immediately. Anyone can make a referral. The DSL should be informed as soon as possible that the referral has been made.

## **Advice for Staff Dealing with Children**

49. Staff act in loco parentis and should therefore aim to act as a reasonable parent would. Staff should be approachable and friendly but there is a line which teachers should not cross. Staff should be consistent, open, and honest.

50. When speaking to children on a one-to-one basis staff should try to avoid rooms with closed doors (and windows in doors should always be kept clear). Depending on the circumstances it may be good practice to have another member of staff present or nearby. There should always be another member of staff within calling distance. Staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

51. In general, physical contact with children should be avoided, although this may be required – for example in the coaching of sport. When a child is making a disclosure physical contact must be avoided.

52. Staff should avoid inappropriate contact with children, including social networking sites on the internet.

For further information please see the Code of Conduct attached at the end of this policy.

### **Dealing with a Disclosure**

53. Dealing with a disclosure can be difficult. It is important that the following steps are followed:

- Listen to the child
- Try not to show any shock you may feel
- Take what they say seriously
- Stay calm and reassure them that they have done the right thing in telling you
- Don't make promises about what might, or might not, happen next
- Do not promise confidentiality
- You might consider using phrases such as 'you've done the right thing', or 'you're not to blame', or 'I understand'
- Allow the child to talk but do not interrogate or ask leading questions – use questions such as 'do you have anything else to tell me?'
- Do not make judgements about the people the child refers to – they may be people they love
- Explain what will happen next and who you will need to talk to
- Keep all written notes and diagrams of observed bruising or marks
- Be objective in your recording

### **Procedures for allegations or concerns regarding a member of staff**

54. Allegations and concerns will be dealt with in accordance with local safeguarding procedures and practice guidance and will be treated in one of two ways as follows:

- Allegations that may meet the 'harms threshold' or 'harms test'; see Appendix 1 of this policy for full details of the College's procedures for managing such allegations against staff. These more formal allegations should be reported directly to the Headmaster, as detailed below and in Appendix 1.

- Concerns that do not meet the 'harms threshold' or 'harms test'; for the purposes of this policy, such allegations are referred to as 'low level concerns'. These low level concerns should generally be reported directly to one of the DSL or a DDSL. For further information, please see the subsequent section of this policy entitled 'Low Level Concerns'.
- If a member of staff is unsure which of the above categories an allegation or concern should fall into, they should feel free to contact either the Headmaster, the DSL or a DDSL.

55. When an allegation is made against a member of staff or a concern expressed about their conduct relating to children, set procedures must be followed. It is rare for a child to make an entirely false allegation, although misunderstanding and misinterpretations of events do happen.

56. A member of staff who is concerned about the conduct of a colleague towards a child is placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all members of staff must remember that the welfare of the child is paramount. No member of staff will suffer a detriment for raising a genuine concern – please do see the College's Whistleblowing Policy.

57. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, the College accepts that some professionals can pose a serious risk to students and will therefore act on every allegation or concern. Members of staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, a member of staff may be suspended where this is deemed the best way to ensure that children are protected.

58. The following details who allegations should be reported to:

- Allegations against members of staff – including the DSL or a DDSL – should be reported directly to the Headmaster. If the Headmaster is absent, allegations against all members of staff should be reported to the Chair of Governors.
- Allegations against the Headmaster or a member of the Governing Body should be reported to the Chair of Governors without the Headmaster being informed.
- Allegations against the Chair of Governors should be reported directly to the LADO, using the contact at the end of this policy.
- Staff may also report any allegations or concerns directly to the police or West Sussex Safeguarding Partnership, if they believe direct reporting is necessary to secure action

If the College receives an allegation relating to an incident that happened when an individual or organisation was using the College premises for the purposes of running activities for children, the College should follow normal safeguarding procedures, including informing the LADO.

The full procedures and statutory guidance for dealing with allegations against staff can be found in Keeping Children Safe in Education (DfE, September 2025).

## **Low Level Concerns**

59. Concerns may arise in several different ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. Seaford College adopts a whole school approach to safeguarding. As such, it seeks to ensure that there is an open and transparent culture in



which all concerns about any adults working in any capacity (employed or voluntary) on behalf of the College are dealt with promptly and appropriately.

60. Creating a culture in which all concerns about adults (including those which do not meet the 'harms threshold' or 'harms test') are shared responsibly with the right person, recorded, and dealt with appropriately, is critical. This should enable the College to identify concerning, problematic or inappropriate behaviour early, thus minimising the risk of abuse and ensuring that adults working in or on behalf of the College are clear about professional boundaries and the ethos and values of the College. It should also protect those working in or on behalf of the College from potential false allegations or misunderstandings.

61. The term 'low-level concern' does not mean that a concern is insignificant. Rather, it means that the behaviour towards a child does not meet the 'harms threshold' or 'harms test' as set out in Appendix 1 of this policy. 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 – that an adult working in or on behalf of the College may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of low-level concerns could include, but are not limited to:

- Being over-friendly with children;
- Having favourites;
- Taking photographs of children on their own 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 inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

62. Seaford College aims to:

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

63. Low-level concerns about a member of staff should be reported to the Headmaster or the Senior Deputy Head.

The College seeks to create an environment in which staff are encouraged and feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted,

Seaford College

might appear compromising to others, or in which their own behaviour might have fallen below expected professional standards.

Where a concern relates to a person employed by an agency or contractor, that concern should still be shared with the Headmaster or the Senior Deputy Head and recorded in accordance with the College's low-level concerns policy. The Headmaster or Senior Deputy Head should also inform the employer about the concern, so that any potential patterns of inappropriate behaviour can be identified.

64. All low-level concerns should be recorded in writing by the Headmaster. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous, then should be respected as far as reasonably possible.

The College must keep these records confidential, held securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records should be reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the College will decide on a course of action, either through its disciplinary procedures or where a pattern or behaviour moves from a concern to meeting the 'harms threshold', in which case it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the College that enabled the behaviour to occur and, where appropriate, policies could be revised or extra training delivered to minimise the risk of it happening again. The College will retain information on low-level concerns at least until the individual leaves its employment.

65. Only substantiated safeguarding allegations will be included in staff references. Low-level concerns will not be included unless they relate to issues which would normally be included in a reference, such as misconduct or poor performance. Low-level concerns relating exclusively to safeguarding (and not to misconduct or poor performance) will therefore not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

66. Concerns about safeguarding should be reported to the Headmaster. If the concern has been raised by a third party, the Headmaster should collect as much information as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously; and
- To the individual involved and any witnesses.

The information collected will help the Headmaster to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for any decisions and action taken.

Further information on the management of low-level concerns may be found in the document *Developing and implementing a low-level concerns policy: a guide for organisations which work with children* (Farrer & Co, 2020).

## **Allegations Against Pupils (Child-on-Child Abuse)**

67. Children may abuse other children, and this is known as child-on-child abuse. Child-on-child abuse may take place both inside and outside school or online. Staff should be able to recognise the indicators and signs of child-on-child abuse and know how to identify it. Even if there are no reports in the College of child-on-child abuse, this does not mean that it is not happening. As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL or a DDSL. It should be noted that it is more likely that girls will be victims and that boys will be perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

68. It is essential that all staff understand the importance of challenging inappropriate behaviours between students, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Child-on-child abuse is most likely to include, but may not be limited to:

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

69. A child against whom an allegation of abuse has been made may be suspended from the College during investigation and the College’s policy on behaviour, discipline and sanctions will apply.

70. If an allegation is made against a child regarding abuse, the College will take advice from children’s social care on the investigation and will take appropriate action to ensure the safety and welfare of all children involved including the child or children accused of the abuse.

71. If it is necessary for a child to be interviewed by the police in relation to an allegation of abuse, the College will ensure that, subject to the advice given by children’s social care, parents are informed as soon as possible and the child is supported through the interview by an appropriate adult. In the case of children whose parents are abroad, the child’s guardian will be requested to support the child and accommodate them if they are suspended during the process.

72. Children with special educational needs and disabilities (SEND) will be appropriately supported in order to reduce any additional barriers that may prevent the recognition and discussion of abuse and neglect.

73. Where an allegation is made against a child, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed. Important considerations will include the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered.

74. Where allegations against children are made, and whilst establishing the facts of the situation, the proximity of the victim and alleged perpetrator(s) will be considered immediately, including sharing of classes, sharing College premises and College transport.

75. As a school, we will minimise the risk of child-on-child abuse by:

- Providing an appropriate PSHE syllabus which develops children's understanding of acceptable behaviour
- Having systems in place for any child to raise concerns with staff. This includes access to the No. 46 and a number of well trained and expert staff.
- Providing appropriate support to children identified as being at risk

#### **Action by the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead**

76. Within 24 hours of receipt of information about abuse or suspected abuse, the DSL or a DDSL must report the matter to the West Sussex IFD or West Sussex Emergency Duty Team, who will investigate the issue and advise on the action the school must take (only in exceptional conditions, and when a child is not at risk, will a referral not be made on the same day). The DSL or DDSL will take advice from IFD as to whether to make a report to the Police. A written record of any referral will be sent to IFD by the end of the working day the referral is made. If there are concerns about a child, but there is no need to make an immediate referral (this will be on the advice of IFD), written records will still be kept (and placed on CPOMS). If there is risk of immediate harm to a young person, however, the referral will be made to IFD or the Emergency Duty Team immediately.

77. Written records of all Safeguarding concerns will be kept confidentially and securely (with access only to the DSL and DDSLs or other staff who require access eg the Headmaster) on CPOMS, separate from pupil records. There will be a note on a child's files that there is further record keeping if a child has a safeguarding file.

78. The parents and child will be informed in writing of the referral to the West Sussex Social Care Assessment Team **only after advice is given by the Social Care Assessment Team or IFD**, although parental consent is not required for referrals to statutory agencies.

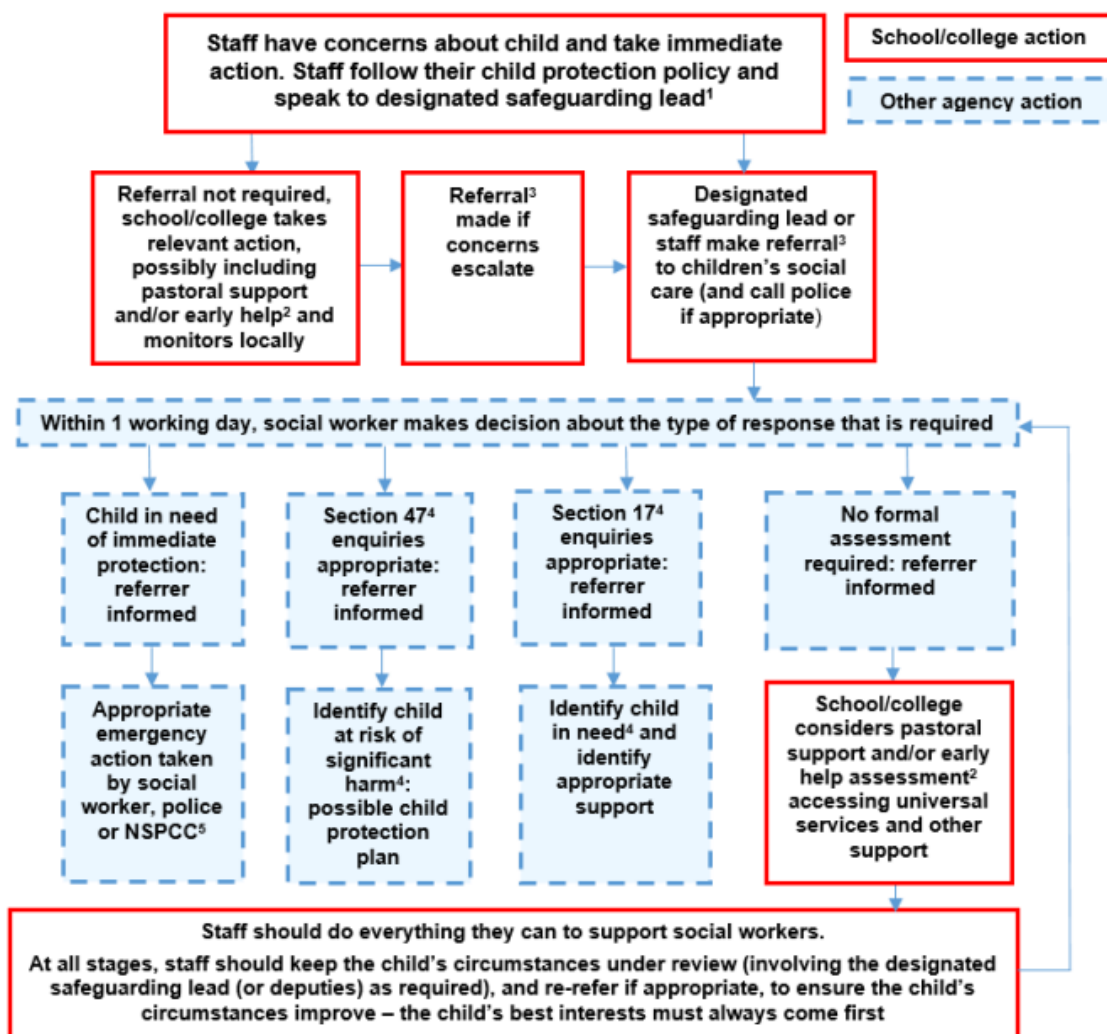
79. The DSL or DDSL will advise the Social Care Assessment Team of any allegation or suspicion of abuse against a child.

80. Children who have suffered or are likely to suffer significant harm must be reported to IFD or the Emergency Duty Team, as set out above. There are other children, however, who may not have suffered or be at risk of suffering significant harm but who will be in need of additional support from one or more agencies. This will lead to inter-agency assessment using procedures set out by West

Sussex Safeguarding Children Partnership, including use of the “Common Assessment Framework” (CAF) and “Team Around the Child” (TAC) approaches.

81. If, after a referral, the child’s situation does not appear to be improving, the DSL (or referrer, if not the DSL) should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child’s situation improves.

82. Please see the flowchart on the next page summarising the above advice.



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## **Record Keeping**

83. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information will be kept confidential and stored securely. All concerns and referrals will be kept on CPOMS. Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome.

84. All records will be kept confidential by the College, held securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

85. Child protection records will be passed on to any new school that a child attends. If Seaford College is the final school that a child attends any child protection records will be kept until the child is 25 (that is, seven years after they reach school leaving age). Once the retention period is finished, confidential records will be shredded and any electronic versions will be purged.

## **Information Sharing**

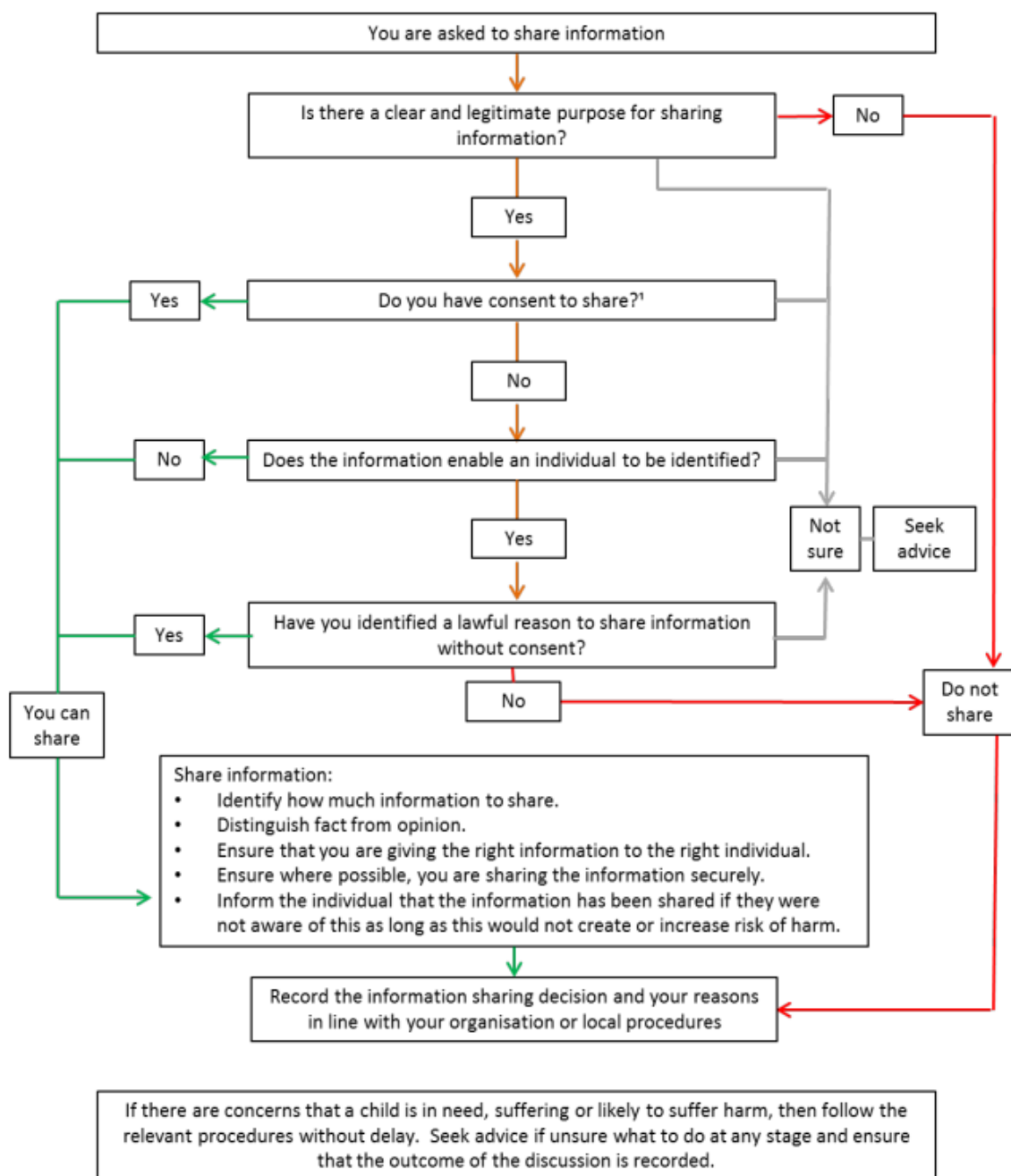
86. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting students' welfare, including in relation to their educational outcomes. All schools have clear powers to share, hold and use information for these purposes, although it is useful to bear in mind the seven golden rules for sharing information, which can be found in "Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers". Poor or non-existent information sharing is a factor repeatedly identified as an issue in Serious Case Reviews - sharing information can be the difference between life and death for a child.

87. The most important consideration with respect to information sharing is whether sharing information is likely to support the safeguarding and protection of a student. When sharing information the following principles should be considered:

- Necessary and proportionate: when making decisions about what information to share it should be considered how much information needs to be released. Information must be proportionate to the need and level of risk.
- Relevant: only information that is relevant to the purposes should be shared with those that need it. This allows others to do their job effectively and make informed decisions.
- Adequate: information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- Accurate: information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical this should be explained.
- Timely: information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations, and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child at increased risk of harm. Staff should ensure that sufficient information is shared, as well as consider the urgency with which to share it.
- Secure: wherever possible, information should be shared in an appropriate, secure way.
- Record: information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information

has been shared and with whom. If the decision is not to share, it is good practice to record the reasons for this decision.

The flow diagram below should help with when and how to share information.



1. Consent must be unambiguous, freely given and may be withdrawn at any time

88. Wherever possible consent should be obtained before sharing information and staff should be open and honest as to why, what, how and with whom the information will be shared. There may, however, be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk.

## **Children Potentially At Greater Risk Of Harm**

89. Whilst all children should be protected, it is important that it should be recognised that some groups of children are potentially at greater risk of harm than others (both online and offline). Further information on this can be found in Keeping Children Safe In Education, paragraphs 173-204. The list below is not exhaustive, but highlights some of the groups that potentially are at greater risk of harm:

- Children who need a social worker (Children in Need and those on Child Protection Plans (see paragraphs 111 and 112 – The Child Protection Plan)
- Children missing from education (See Children Missing Education Policy)
- Children requiring mental health support (see paragraphs 38-41)
- Looked after children and previously looked after children (see paragraphs 114 and 115)
- Children with special educational needs, disabilities or health issues (see paragraph 114)
- Children who are lesbian, gay, bi or trans (LGBT).

## **Early Help**

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

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education Health and Care plan)
- Has a mental health need
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from College
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol or other drugs themselves
- Is at risk of so-called ‘honour’-based abuse such as FGM or Forced Marriage
- Is a privately fostered child.

## **Filtering and Monitoring**

91. Whilst considering our responsibility to safeguard and promote the welfare of students at the College and provide them with a safe environment in which to learn, the College understands its responsibility to do all that it reasonably can to limit students’ exposure to risks from the College’s IT system. As part of this, as well as educating students of the risks, the College has appropriate filtering and monitoring systems in place and regularly reviews their effectiveness.

92. The DfE has published the document “Filtering and Monitoring Standards for Schools and Colleges”, which the College’s IT Strategy Group has considered to make sure that it meets all of the standards. As part of this the College:



- Identified Jo Forman (the DSL) and Victoria Padgham (the Governor responsible for Safeguarding) to take lead responsibility for filtering and monitoring.
- Reviews filtering and monitoring regularly, and at least annually.
- Has filters in place to block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Has effective monitoring strategies in place that meets safeguarding needs.
- Uses the <https://www.gov.uk/guidance/plan-technology-for-your-school> to self assess against the filtering and monitoring standards and receive recommendations on how to meet them.
- Uses recently published <https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations>

### **Safeguarding Students Who Are Susceptible to Extremism**

93. Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

94. Seaford College values freedoms of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. However, freedom comes with responsibility and free speech that is designed to manipulate the susceptible or that leads to violence or harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

95. The current threat from terrorism in the United Kingdom may include the exploitation of susceptible people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people susceptible to future manipulation and exploitation. Seaford College is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

96. Seaford College seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those links to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights movements.

### **Radicalisation and Extremism**

97. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

98. Extremism is defined by the CPS as "the demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;

- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.”

99. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

### **Susceptibility to Radicalisation**

100. Children may become susceptible to radicalisation through a range of social, personal and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that College staff are able to recognise those susceptibilities.

101. Indicators of susceptibility include:

- Identity crisis – the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal circumstances – migration; local community tensions; and events affecting the student’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet aspirations – the student may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- Special educational need – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list, however, is not exhaustive, nor does it mean that all young people experiencing any of the above are at risk of radicalisation for the purposes of violent extremism.

102. More critical risk factors could include:

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

## **What To Do If You Have A Concern Regarding Radicalisation/Extremism**

103. If you have a concern about a particular child you should follow the College's normal safeguarding procedures, contacting the DSL or a DDSL. You can also contact the local police force or dial 101. The DfE also has a dedicated telephone helpline (020 7340 7264) to enable staff and governors to raise concerns regarding extremism directly. Concerns can also be raised by email to [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk). The DSL or DDSL will consider the level of risk to identify the most appropriate referral, which could include Channel or Children's Social Care.

## **Educating Students**

104. All children at the College receive education on safeguarding matters, appropriate relationships, radicalisation and extremism, and what constitutes abuse at the appropriate point in their PSHCE programme. This includes regular teaching on e-safety, bullying, and keeping safe whilst using social media. For further information please see the College RSE Policy and the College Internet Access Policy.

Revised guidance on Relationships, Sex, and Health Education is expected in 2025.

## **Training Staff**

105. All staff will be required to read and understand at least Part One of "Keeping Children Safe in Education". New staff will be provided with at least Part One of KCSIE (Sept 2025) and existing staff will be updated appropriately and always when KCSIE is updated. For staff who cannot read English, or at all, the College will take steps to ensure that they understand key information. Staff will also be provided with a copy of 'The Prevent Duty', which they will be required to read.

106. As set out earlier, the DSL and DDSLs will receive updated Child Protection training every two years whilst all other staff will receive updated Child Protection training regularly. The College will consult with the WSSCP to determine the most appropriate schedule, level and focus for training (all staff will have at least an annual update with regards to safeguarding). The required training content for the DSL and DDSLs is set out in Annex B of KCSIE and will cover inter-agency working, participation in child protection case conferences, supporting children in need, record keeping and promoting a culture of listening to children.

107. All staff, including temporary staff and volunteers, will be provided with induction training that includes:

- The College's Safeguarding Policy (including the role of the DSL)
- The staff code of conduct
- The College's Whistleblowing Policy
- The identity of the College's DSLs
- Pupil Behaviour Policy
- Children Missing Education Policy
- Acceptable Use for Mobile Devices Policy
- Internet Acceptable Use Policy
- A copy of Part One and Annex B of KCSIE

108. Regular contractor staff will be given Safeguarding training and will also be introduced to the DSL so that they are aware of who to pass on concerns to and appropriate behavioural boundaries.

## **Supporting Staff**

109. We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

110. We will support such staff by providing an opportunity to talk through their anxieties with the DSL or DDSLs and to seek further support as appropriate. Counselling support is also available.

## **Induction of Senior Pupils/Prefects/Peer Mentors**

111. Any child assuming responsibility for other children are given induction training on appropriate action to take should they receive any allegations of abuse.

112. In boarding environments senior pupils work with duty staff who will advise them on appropriate interaction with junior pupils.

## **Social Care Meetings**

113. At times staff will be called to participate in meetings organised and chaired by social care. These might be:

- Strategy discussions
- The child protection review conference
- Child protection conferences
- Family group conferences – for children in need, in a range of circumstances, where a plan is required for the child's future welfare
- Professional's meetings – in which representative professionals from different agencies are asked to meet to discuss children and their families with a view to providing support or making recommendations in terms of the next stages of involvement
- Core group meetings – a meeting in which a 'core' group of professionals associated with the family are asked to meet to review the progress of actions decided at case conferences and plan reviews.
- As part of a CAF – the Common Assessment Framework.

114. At these meetings representatives from the school should be ready to report, providing information about:

- Attendance and punctuality
- Academic achievement
- The child's behaviour and attitude
- Relationships with peer group and social skills generally
- The child's appearance and readiness for school
- Contact with parents/carers
- Any specific incidents that need reporting

115. Prior to the meeting, class teachers and other adults working closely with the child should be asked for their comments. Following the meeting feedback should be given and staff brought up to date with any actions that are needed.

### **The Child Protection Plan**

116. Children placed on a child protection plan will require additional support and monitoring. The social care department will inform a school receiving a child on a plan and accompanying records should follow from the child's previous school.

117. Where children are on a child protection plan and leave one school for another the DSL must inform the receiving school and the key worker at the social care department. If the child leaves the school with no receiving school, details should be passed to the Principal Emergency Social Worker.

### **Supporting Children at Risk**

118. For children at risk, school may be the one stable place from which they can expect security and reassurance. It is not only being alert to potential abuse but providing the support to help children through difficult times, providing them with the coping skills that can help avoid situations arising and deal with emotional difficulties afterwards if they do.

### **Looked After Children**

119. The Governing Body will ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority (if the College at any point has such children on roll). This would include ensuring that the DSL and DDSs have responsibility for their welfare and progress and have up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents and delegated authority to carers (see statutory guidance "Promoting the education of looked after children").

### **The Pastoral Support Programme**

120. Children who are 'looked after' should have their own pastoral support programme which will be drawn up in discussion with social care, the DSL and DDSs, foster parents and the child themselves. Children with SEN/D may be more vulnerable and therefore the pastoral team in the No. 46 meet regularly with the Head of Learning Support to review any concerns.

### **Working with Parents**

121. It is important that the College has an established approach to working with parents. Parents' and the children's needs for privacy should be respected. Attitudes to and contact with parents should be non-judgemental in order to obtain the most conducive working relationship. The priority is the needs of the child and effective liaison is crucial for this.

122. It should be recognised that families from different backgrounds and cultures will have different approaches to child rearing. These differences should be acknowledged and respected provided they do not place the child at risk as defined earlier in the policy. Where concerns are raised with respect to FGM the police should be contacted immediately.

## Further Information

### Contact Numbers

123. The telephone numbers for the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are:

- |                         |              |
|-------------------------|--------------|
| a. Jo Forman (DSL)      | 07549032556  |
| b. Will Yates (DDSL)    | 07557439693  |
| c. Sarah Adams (DDSL)   | 07762 984777 |
| d. George Vernon (DDSL) | 07763 547942 |
| e. Mickey Earle (DDSL)  | TBA          |

Their emails are:

- |                  |  |
|------------------|--|
| a. Jo Forman     | <a href="mailto:jforman@seaford.org">jforman@seaford.org</a> |
| b. Will Yates    | <a href="mailto:wyates@seaford.org">wyates@seaford.org</a>   |
| c. Sarah Adams   | <a href="mailto:sadams@seaford.org">sadams@seaford.org</a>   |
| d. George Vernon | <a href="mailto:gvernon@seaford.org">gvernon@seaford.org</a> |
| e. Mickey Earle  | <a href="mailto:mearle@seaford.org">mearle@seaford.org</a>   |

124. To contact the Safeguarding Governor the Clerk to the Governors should be contacted on

Telephone	01798 867817
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125. The telephone number and email of the West Sussex Safeguarding Children Partnership is:

- |              |  |
|--------------|--|
| a. Telephone | 03302227799 / 0330 222 6664 (Emergency Team)                         |
| b. Email     | <a href="mailto:wsscp@westsussex.gov.uk">wsscp@westsussex.gov.uk</a> |

126. The online referral tool can be accessed at: <https://www.gov.uk/report-child-abuse-to-localcouncil>

127. The Integrated Front Door (IFD) can be contacted on:

- |          |   |
|----------|---|
| a.       | <a href="https://www.westsussexscp.org.uk/report-a-concern-about-a-child">https://www.westsussexscp.org.uk/report-a-concern-about-a-child</a> |
| b. Email | <a href="mailto:WSchildrenservices@westsussex.gov.uk">WSchildrenservices@westsussex.gov.uk</a>  |
| c. Tel.  | 01403 229900 (8.00am – 5.00pm)<br>330 6664 (Out of hours)   |

128. The LADO for the West Sussex Safeguarding Children Partnership (normally only contacted when allegations are made against a member of staff – Donna Tomlinson) can be contacted on

- a. Tel. 01403 229900  
03302226450
- b. Email LADO@WestSussex.gov.uk

129. The NSPCC Whistleblowing Helpline can be contacted on:

- a. Tel. 08000280285
- c. Website [www.nspcc.org.uk/whistleblowing](http://www.nspcc.org.uk/whistleblowing)

130. The telephone number and address for the Disclosure and Barring Service (DBS) is:

- a. Tel. 01325 953795

131. The following telephone numbers may be useful for pupils:

- a. Childline 0800 1111
- b. NSPCC 0808 800 5000
- c. Ofsted 08456 404040

#### **Policy Review Dates**

132. This policy was reviewed by the College Governing Board in August 2025 and will undergo annual review.

Date: 1<sup>st</sup> September 2025

Review Date: 1<sup>st</sup> September 2026

## **Appendix 1: Concerns or Allegations Relating to Staff**

This appendix details the process for dealing with concerns or allegations relating to staff (including the Headmaster), volunteers and others (including Governors), who are in contact with students in the College.

(References to staff in this policy include all staff employed at Seaford College, part-time staff, contractors, volunteers, and peripatetic staff).

Relevant guidance includes:

- Working Together to Safeguard Children (DfE, Dec 2023)
- Keeping Children Safe in Education (DfE, Sept 2025)
- What to do if you're worried a child is being abused (DfE, March 2015)

### **Reporting Concerns**

1. It is essential that any concern or allegation of abuse made against a member of staff, member of the Governing Body or a volunteer at Seaford College is dealt with quickly, and in a fair and consistent way that provides effective protection for the child(ren) and at the same time supports the individual who is the subject of the allegation.

All staff and volunteers should know how to recognise, and report concerns or allegations and should understand what to do if they have such concerns personally or hear an expression of such concerns or allegations against colleagues.

2. On hearing an allegation or concern about abuse directly from a student, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided, and inappropriate guarantees of confidentiality should not be given. Rather, the student should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility. An accurate written record should be made for this purpose.

All allegations about members of staff (including the DSL or DDSLs) must be reported without delay to the Headmaster.

All allegations against the Headmaster must be reported immediately to the Chair of Governors (without informing the Headmaster)

3. Following this, the Headmaster or the Chair of Governors (as appropriate) will notify the DSL and will, if appropriate, report immediately to the LADO (see checklist of immediate reporting actions below). Concerns about any member of the Governing Body, including the Chair, should be reported direct to the LADO.

It is vital that expressions of concern that do not necessarily amount to 'allegations' are reported, particularly if there are repeated reports of such concerns and/or questionable conduct. Low level concerns should be reported to the Headmaster or Deputy Head; more serious allegations should initially be reported to the Headmaster. It may be that the concern expressed has been raised by another party. If there are repeated reports of such concerns and/or questionable conduct, a pattern of unacceptable behaviour may be identified.



4. Allegations against a former member of staff no longer working at Seaford College should be referred to the Police and LADO. The Headmaster will liaise with the Police and LADO and follow their advice.

5. This procedure, known as the 'harms threshold' or 'harms test' will be used in all cases in which there is an allegation or suspicion that a person working with or who is in contact with students has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates she or he would pose a risk of harm if he or she worked closely with children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

6. These criteria should be considered in the context of the four main categories of abuse (ie physical, sexual, emotional and neglect as described in the Safeguarding Policy). These include concerns relating to inappropriate relationships between members of staff and students, for example:

- Having a sexual relationship with a child if in a position of trust in respect of that child, even if consensual (ss. 16-19 Sexual Offences Act 2003);
- Grooming (ie meeting a child aged under 16 with intent to commit a relevant offence (s. 15 Sexual Offences Act 2003);
- Other 'grooming' behaviour rising to concerns of a broader safeguarding nature (eg inappropriate text/email messages or images, gifts, socialising etc); or
- Possession of indecent photographs/pseudo-photographs/videos of children.

7. Staff, parents and members of the Governing Body are reminded that they should not:

- Investigate the matter themselves;
- Make assumptions or offer alternative explanations for behaviours; or
- Promise confidentiality to the alleged victim(s).

8. The Education Act 2011 prohibits the publication of material that may lead to the identification of a member of staff who is the subject of an allegation. 'Publication' includes verbal conversations or writing, including content placed on social media sites. Seaford College will always comply with the provisions of the Act.

### **Checklist of Immediate Reporting Actions**

9. The procedure for individual members of staff, volunteers or other adults when a student makes a disclosure, or they notice something they feel should be reported is:

- Write a detailed and timed note of what has been disclosed or noticed, said or done;
- Report immediately the information to the DSL, the Headmaster or the Senior Deputy Head;
- Pass on the written record;

- If the suspicion or allegation is against the DSL, the information must be taken to the Headmaster;
- The Chair of Governors deals with allegations of abuse made against the Headmaster, in liaison with the LADO

10. The procedure for the Headmaster, when a concern or allegation against a member of staff is brought to him is:

- If there is no written record, write a dated and times note of what has been disclosed or noticed, said or done;
- Notify the Chair of Governors and LADO on the same day;
- The Headmaster may ask to clarify details or circumstances of the allegation, but this must not amount to an investigation;
- Copies of the documents concerning the allegation must be sent to the LADO on the same day;
- Report to West Sussex Safeguarding Children Partnership in relevant cases, on advice of the LADO
- On-going involvement in cases: liaison with the LADO and co-operation with the investigating agencies as appropriate; consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

11. The procedure for the Chair of Governors if an allegation is brought regarding the Headmaster is:

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done;
- Notify LADO on the same day;
- The Chair of Governors may ask to clarify details or circumstances of the allegation, but this must not amount to an investigation;
- Copies of the documents concerning the allegation must be sent to the LADO on the same day;
- Report to West Sussex Safeguarding Children Partnership in relevant cases, on the LADO's advice; in cases concerning the Headmaster, a report to West Sussex Safeguarding Children Partnership may sometimes be undertaken by the LADO on behalf of the Chair of Governors, following discussion;
- On-going involvement in cases: liaison with the LADO and co-operation with the investigating agencies as appropriate; consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

### **How Allegations Will Be Managed**

12. Decisions about course of action would be taken on a case-by-case basis, bearing in mind the paramount importance of the safety of any child(ren) involved but also remembering that the member of staff, against whom a allegation has been made, has the right to remain anonymous and to expect any allegations to be investigated as expeditiously as possible. Any course of action would be subject to a risk assessment. Decisions would also follow the guidance of LADO and/or the Police.

Upon receiving an allegation or concern about an allegation or concern about a staff member, the case manager (whether the Headmaster or the Chairman on Governors) will immediately discuss the

allegation with the LADO. The purpose of an initial discussion is for the LADO and the case manager to consider the nature, content and context of the allegation and agree a course of action. In the process of this liaison, the case manager and the LADO will:

- Share what information will be available, both from the source of the allegation and also from Personnel files;
- Identify what other information might be needed;
- Consider whether the alleged perpetrator should continue working or remain in contact with students;
- Consider whether suspension is appropriate advice to the College on this aspect;
- Decide what information and/or advice is to be given to the Headmaster (or nominated Governor, if the allegation is about the Headmaster), including whether the member of staff should be informed about the allegation at this stage; and
- Decide what action is needed, and who needs to be involved and informed (including the DBS and/or the TRA).

13. If the parties involved in these discussions consider it necessary, a Strategy Meeting is arranged, usually by Social Services, which will involve representatives from the LADO, the Police and the College (e.g. the Headmaster, DSL or Chair of Governors, as appropriate).

From the above discussions, there are three possible courses of action:

- It may be the subject of a Police and/or joint Police and Social Services investigation and possible action through the courts; or
- It may be the subject of a disciplinary investigation; or
- The matter may be remitted to the College to be dealt with.

The following definitions will be used when determining the outcome of allegation investigations:

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

If Social Services and the Police decide to take no action, the College will still need to consider what further investigation is necessary. If there is a case to answer, a disciplinary hearing will be called, which could lead to dismissal.

14. Where a criminal investigation has taken place and either (i) a trial has resulted, (ii) the investigation has been closed without charge or (iii) a decision has been taken not to prosecute a case after charge, the case manager will discuss with the LADO what, if any, further action is required as regards the member of staff concerned and the sharing of information obtained by agencies involved in assisting any further action to be taken by the College.

15. Where a disciplinary investigation is required, the investigation should be conducted in accordance with the College's Disciplinary Policy.

Whenever possible the person will be given a full opportunity to answer the allegation and make representations about it. The process of investigating the allegation, and reaching a judgement about whether it is substantiated, will continue even if the person does not cooperate.

Suspension is never a default option and the College will consider all other options before suspending a member of staff. The College would only suspend someone if there were no other reasonable alternative.

If the suspension concerned a member of staff normally resident in a boarding house, or on-site, accommodation would be found for them elsewhere.

'Settlement agreements' (by which contract a person agrees to resign, the College agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference) will not be used in these cases. In any event, such an agreement would not prevent a thorough Police investigation where that is appropriate.

### **Supporting Those Involved**

16. The College's procedures will be managed with common sense and sound judgement throughout. Cases may not meet the criteria in (5) and (6) above, and indeed may not require either a Police investigation or further enquiries by WSSCP. In such situations, the College will resolve the matter as quickly as possible. Where more appropriate, the College may use the Complaints Procedure instead.

As an employer, the College has a duty of care towards its employees. The College provides effective support for anyone facing an allegation and will provide staff members with a named contact if they are suspended. Social contact with colleagues and friends will not be prevented, unless there is evidence to suggest that it is likely to be prejudicial to the gathering and presentation of evidence.

Rarely, some allegations may be so serious that the College may need to ask for immediate intervention by West Sussex SCP and/or the Police. If this is the case, and the College believes the above criteria are likely to be met, the DSL or Headmaster will inform the LADO of such allegations immediately and keep the Chair of Governors informed.

Parent(s)/guardian(s) of a student involved will be told about the allegation if appropriate as soon as possible, if they do not already know of it. They will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution. However, where a strategy discussion is required, or Police or WSSCP need to be involved, this should not take place unless those agencies have been consulted and have agreed what information can be disclosed to the parent(s)/guardian(s). That includes the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, the parent(s)/guardian(s) of the student will be told the outcome.

### **Action Upon Conclusion Of A Case**

17. The College (Headmaster) will refer to the DBS (following consultation with LADO) any person who has been removed from working (paid or unpaid) in regulated activity, or would or might have been so removed had he/she not resigned or left of his/her own accord, and it believes the person may have harmed, attempted to harm, incited another to harm or put a child at risk of harm or if there is a reason to believe the person may have committed one of a number of offences listed under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009.

‘Removal from working’ for these purposes will include dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by the agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation or voluntary withdrawal from any of the above.

In situations where, on conclusion of the case, it is decided that a person who has been suspended can return to work, the College will consider how best to facilitate this. The College appreciates that most people would benefit from some help and support when returning to work after a very stressful experience. Depending upon the individual’s circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The College will also consider how the person’s contact with the student or students who made the allegation can best be managed if they are still attending the College.

If an allegation is determined to be false, the case manager may refer the matter to the Children’s Services to determine whether the student concerned is in need of services or may have been abused by someone else.

In the event that an allegation is shown to have been deliberately invented or malicious, the Headmaster will consider whether any disciplinary action is appropriate against the student who made it. This may include permanent exclusion from the College.

A referral will be made to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are ‘unacceptable professional conduct’, ‘conduct that may bring the profession into disrepute’ or a ‘conviction, at any time, for a relevant offence’.

The College will make a serious incident report to the Charity Commission at the appropriate time, whenever the Commission’s guidelines deem it appropriate to do so.

### **Abuse of Trust**

18. All members of staff should be aware that the Sexual Offences Act 2003 makes it an offence for a person over 18 to have a sexual relationship with a child under 18 where the person is in a position of trust (e.g. a member of staff), even if the relationship is consensual.

### **Records**

29. A central record of all allegations and concerns (and connected documents) against members of staff will be kept securely by the Headmaster (or the nominated Safeguarding Governor, if it involves the Headmaster), separate from normal staff and student records, and with access limited to officers who may be key workers for cases. The DSL and DDSs will always be kept informed of

safeguarding and child protection matters and will have access to all records. The only exception to this requirement for permanent recording is where allegations have been found to be malicious. In such cases, all records will be removed from staff personal files.

The record of allegations may provide clarification in cases where a future DBS disclosure reveals information from the police about an allegation that did not result in a criminal conviction. It will also help to prevent unnecessary re-investigation if, as occasionally happens, an allegation re-surfaces after a period. The record will be retained at least until the member of staff involved reaches normal retirement age, or for a period of 10 years from the date of allegation if that is longer.

An allegation which is proven to be false, unsubstantiated or malicious will not be included in references for staff.

Every effort will be made to maintain confidentiality and to guard against publicity while an allegation is being investigated or considered. Apart from keeping the student(s), parent(s)/guardian(s) and the person about whom the allegation has been made (in cases when this would not place the student at further risk) up to date with the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries or manage related disciplinary processes.

### **Transfer of Records**

30. Where there have been concerns about a member of staff and he or she leaves the College to work elsewhere, the Headmaster (or the DSL/Nominated Safeguarding Governor if it involves the Headmaster) will consider the question of passing the concerns to the new employer or authority.

The DSL, Nominated Safeguarding Governor or Headmaster will pass allegations or concerns affecting a student on to his/her next school, if applicable.

### **Monitoring and Evaluation**

31. This policy will be reviewed annually by the DSL and revised in accordance with changing national requirements for Independent School. It will be shared with staff and made available on the College's website. The Governing Body will conduct a review of safeguarding and child protection policies and the effectiveness of their implementation at least annually.

# Code of Conduct for Staff 2025-2026

Date: September 2025

Review Date: **September 2026**

Policy Contact: Mrs Jo Forman, DSL, Mr William Yates, Senior Deputy Head





## **Code of Conduct for Staff**

### **Introduction**

1. These guidelines are in place to protect teachers and staff against false or malicious accusations, or accusations which may result from misunderstandings both from a student towards a member of staff and from a member of staff towards another member of staff. They are neither prescriptive nor exhaustive. These guidelines are also in place to guide staff on dress code whilst at work.

Teachers and staff are expected always to behave in accordance with the recognised standards of our profession, in accordance with the law and the Teachers' Standards (Part One: Teaching and Part Two: Personal and professional conduct), and to observe the common sense boundaries between teacher and pupil.

Staff are expected to arrive on time to lessons and be well prepared for them, are required to fulfil duties which are assigned to them in supervising students outside of lessons, and are expected to uphold the school's behaviour policy both inside and outside the classroom.

It must be clear and understood that it is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual.

### **Physical Conduct**

2. It is understood that there may be times when physical conduct may be necessary between student and teacher – for example a sports teacher or a specialist performing arts teacher may need to touch a pupil to demonstrate correct technique. There must be, however, no unnecessary physical contact.

Teachers and staff must be wary of physical contact that might be misinterpreted by a student, especially in "one to one" situations or circumstances in which a student might have a physical aversion to being touched.

4. A teacher or member of staff must never touch a student below the waist unless there is a very good reason (such as attending to an injury). If touching a pupil is deemed necessary (for example, administering First Aid), it is good practice to ask permission first and/or to make sure that there is another person present.

5. No teacher or member of staff may ever strike, manhandle, or intimidate a pupil.

### **Use of Physical Restraint**

6. The College follows DfE guidance relating to physical intervention, 'Use of Reasonable Force' A Guide for Head Teachers, Staff and Governing Bodies, 2013.

A student must only be physically restrained to prevent danger to himself or others or very serious damage to property. Only reasonable and non-injurious means may be used and only for the minimum time necessary. Further assistance must be called at the earliest opportunity.

Any use of physical intervention must be reported to a Deputy Head, who will inform the Headmaster, immediately and will be logged. There will be a regular review of the log.

### **Visiting Boarders' Rooms and Other Sensitive Areas**

7. It is important, in the boarding houses, to strike a balance between privacy and supervision. Some guidance includes:

- a. Knocking on a student's door before entering.
- b. Leaving immediately if a student is in any state of undress.
- c. Not visiting a student's room after 'lights out', unless there is a pressing reason to do so. If a member of staff has to do this they should knock on the door and switch on a light before entering, or stay in the doorway. They should not enter the room in the dark.
- d. If a member of staff needs to see a student regarding a serious matter (disciplinary or pastoral), this meeting should take place in a 'public room', for example the House study, rather than in a student's bedroom.
- e. Another adult may be present if very upsetting news (such as a family bereavement) is being given to a student.
- f. Staff should not visit students' showers or bathrooms when they are being used, except in very exceptional circumstances.

### **Language**

8. Teachers and staff must not swear, ridicule, verbally abuse students, gossip, discuss third parties or engage in salacious conversation. Such conduct can lead to misunderstandings or cause confusion in roles with undesirable consequences.

In general teachers and staff ought to refrain from using students' nicknames.

### **Searching**

9. The College follows DfE guidance relating to searches from 'Screening, Searching and Confiscation Force, a guide for Head Teachers, Staff and Governing Bodies, 2022.'

Teachers and staff should not physically search a student, although there may be occasions in which it is appropriate to ask a student to show you what is in his/her pockets.

Teachers and staff may confiscate inappropriate items from students but their action must be reasonable and proportionate. Confiscated items should be given to the SMT Secretary or their Housemaster/Housemistress.

## **When and Where to Meet Students**

10. When speaking to pupils on a one to one basis staff should try to avoid rooms with closed doors (and windows in doors should always be kept clear). Depending on the circumstances it may be good practice to have another member of staff present or nearby. There should always be another member of staff within calling distance. Staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
11. For those classes where one to one teaching will take place (for example individual music lessons), there must be a glass panel in the door which is kept clear at all times.
12. There may be times when it is inevitable that staff need to drive a lone pupil. Examples of this could be an injury at a sport match that needs hospital attention, driving a pupil to an individual medical appointment, driving a pupil to an individual external sports practice etc. When staff do this they should, where possible, use a school vehicle (the 9 seater minibus). Pupils should sit in the back of the bus. Where personal cars are used pupils should, again, sit in the back seat of the car. Normal practice should be observed (seat belt checking etc).
13. Teachers and staff must not entertain students or boarders in their residential accommodation.

Teachers and staff must remain alert to potential problems that could arise if they saw a student too frequently or for too long.

## **Alcohol**

14. There is guidance in the College 'Drugs, Alcohol and Smoking Policy' about when it might be appropriate for students to consume alcohol. Teachers and staff must always conduct themselves responsibly in the consumption of alcohol at College events.

If a teacher or member of staff was to be worse for drink in any circumstance in which he or she might be expected to exercise duty of care for students, whether in the classroom or elsewhere, it would be regarded as a very serious offence which may well be gross misconduct. A member of staff or teacher who is driving pupils must not consume alcohol.

## **Communications**

15. It is acceptable for teachers and students to communicate when necessary on College matters by email, telephone and text, but such communications must be:
  - a. Only made through College property and using the College email address except in an emergency
  - b. Restricted to what is necessary on College business
  - c. Appropriate
  - d. Professional
  - e. Take heed of the guidelines offered above with regard to language, and

- f. Only consist of form and content, which a parent or Deputy Head would regard as acceptable.

Staff and teachers must not have current students as 'Friends' on their social networking sites nor should they agree to be 'Friends' on students' social networking sites. Social networking sites are not an appropriate way of staff and teachers to communicate with students or vice versa. Texting should only be used when other forms of communication are not possible.

### **Sanctions**

16. The College has a Behaviour, Rewards and Sanctions Policy and any sanctions used by staff and teachers must fall within the range of sanctions listed in it.

### **Bullying and Psychological Abuse**

17. Teachers and members of staff must never bully or psychologically abuse a student.

Teachers and staff should be aware that it is sometimes possible to bully or psychologically abuse a student through use of sarcasm, excessive criticism, referring to a student's personal characteristics, making a student the object of jokes or by the use of nicknames, the hurtful significance of which the teacher may be unaware.

Staff and teachers must not behave in a way that is physically intimidating nor engage in classroom behaviour such as throwing objects of any sort around, which could be misconstrued as assault or accidentally result in injury.

### **Inappropriate Behaviour by a Student**

18. A teacher or member of staff who thinks that he or she is the object of inappropriate personal attention or remarks from a student should, in the first instance, discuss this openly and immediately with their Head of Department, Line Manager or member of the Senior Management Team, according to the context. An appropriate course of action will then be agreed and acted upon.

### **Gifts**

19. In light of the Bribery Act 2010, staff must always be circumspect about the implications of gifts or hospitality given to or received from students or parents.

A fuller outline of steps that should be taken on receiving of such gifts is given in the College's Gifts and Hospitality Policy.

### **Criminal Offences Against Students**

20. Physical assault and indecent assault of students are criminal offences. Teachers and other members of staff must be aware that legislation also makes the following into criminal offences:

- a. "Grooming"

- b. Having any sort of sexual relationship with a student, regardless of age, to whom the teacher owes a duty of care and in relation to whom the member of staff is in a position of trust. It is an offence for a person aged 18 or over to have a sexual relationship with a child under the age of 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual.
- c. Possessing, downloading or transmitting obscene images of children.

## **Whistleblowing**

21. Allegations of criminal acts by a member of College staff against a student, and any conduct which might lead to children being harmed or which might raise questions about the suitability of the member of staff for working with children, must be reported immediately and confidentially to the Headmaster; if you are uncertain, discuss the matter confidentially with either of the Designated Members of Staff. For further details please see the College's Whistleblowing Policy.

## **Harassment and Bullying**

22. Seaford College is committed to providing a working environment free from harassment and bullying and ensuring that all staff are treated, and treat others, with dignity and respect. This section of the code of conduct covers harassment or bullying which occurs at and out of the workplace, such as on work-related events or social functions. It covers bullying and harassment by staff (which may include consultants, contractors and agency workers) and also by third parties such as suppliers or visitors to the College. The College may amend this (and any other) part of the code of conduct and it does not form part of any employee's contract of employment.

23. Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. It also includes treating someone less favourably because they have submitted to, or refused to submit to, such behaviour in the past.

24. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment may include, for example:

- Unwanted physical conduct, including touching, pinching, pushing or grabbing.
- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)
- Offensive emails, text messages or social media content.
- Mocking or belittling a person's disability.

25. A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

26. Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power

does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

27. Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- a. Physical or psychological threats
- b. Overbearing and intimidating levels of supervision
- c. Inappropriate derogatory remarks about someone's performance

Legitimate, reasonable and constructive criticism of a member of staff's performance or behaviour, or reasonable instructions given to members of staff in the course of their employment will not amount to bullying.

28. If an employee considers that he or she is being harassed or bullied, they should consider whether they feel able to raise the problem informally with the person they consider responsible. They should explain clearly to them that their behaviour is not welcome or makes them feel uncomfortable. If this is too difficult or embarrassing, they should speak to their line manager or the Headmaster, who can provide confidential advice and assistance in resolving the issue formally or informally.

29. If informal steps are not appropriate, or have not been successful, an employee should raise the matter formally under the College's Grievance Procedure. The College will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation, the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. The College will consider whether any steps are necessary to manage any ongoing relationship between the employee and the person accused during the investigation.

30. Once the investigation is complete, the College will inform the employee of its decision. If the College considers an employee has been harassed or bullied by another employee, the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a contractor or other visitor, the College will consider what action would be appropriate to deal with the problem. Whether or not an employee's complaint is upheld, the College will consider how best to manage any ongoing working relationship between all concerned.

31. Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under the College Disciplinary Procedure.

32. Information about a complaint by or about an employee may be placed on the employee's personal file, along with a record of the outcome and of any notes or other documents compiled during the process.

### **Dress Code**

33. Teaching is a formal and professional vocation. A staff dress code should reflect this and it is important that staff at Seaford College project a professional image to students, parents and other stakeholders. Our dress code reflects the high expectations of the College in terms of teaching and

learning, behaviour and student uniform. It is recognised that staff within the College perform a variety of different roles and our dress code takes this into account.

34. For this reason it is important that:

- All staff must dress in a manner which reflects their undoubted professionalism
- All staff are models for the learners in the College, therefore they have a responsibility to model appropriate dress and appearance
- The image that we project as professionals is associated with how we present ourselves; the image of the College in the community is related to how all adults in the College dress. It is therefore important to dress appropriately when acting in a professional capacity and with due regard to any conclusions parents/visitors may draw from your appearance.

35. For this reason this part of the code of conduct provides:

- Guidance to new colleagues
- A benchmark against which the standards of all can be measured
- A framework to inform decisions on standards taken by individual(s)

36. The general principles of the dress code are that:

- Staff must abide by the dress code and dress appropriately for their particular role
- Clothing should be clean and in a good state of repair
- The Head has the final say on whether clothing and appearance is appropriate
- If a staff member's clothing or appearance is not deemed appropriate, the Head or other member of SLT will speak to the staff member concerned to discuss any concerns

37. For this reason staff should abide by the following:

- Clothing must be professional attire, not casual wear
- Male staff must wear a shirt, tie, trousers and smart shoes (except PE staff and designated support staff).
- Female staff must wear smart dresses or separates (except designated support staff). Trousers may be full or  $\frac{3}{4}$  length, but no shorter. Any cropped trousers must be formal and tailored. Skirts and dresses should not be too short (just above knee length at the shortest). Shirts, blouses, knitwear and other smart tops may be worn, plus smart shoes or boots
- Hair should be neat and tidy. No extreme hairstyles are allowed
- Visible tattoos are discouraged and must be discreet
- Jewellery should be discreet with visible piercing restricted to ears (for women only). Single nose studs may be worn for reasons of culture or religious observance only.
- On formal occasions all staff attending must dress in a professional manner befitting the event.
- All staff apart from PE staff should wear normal attire whilst teaching in the classroom. If staff are involved with games they should get changed before their next teaching commitment if at all possible. However, if this unreasonable common sense must prevail and hence, on certain occasions games kit may be worn, whilst teaching, for non PE staff (with direct permission from their line manager). Games and PE staff should not, however, wear shorts in the Dining Hall for lunch.
- CCF staff will, of course, wear their uniform on certain days but this should, of course, be worn smartly as would be expected.
- Jackets or blazers should be worn around the College site. The only exception is at the Headmaster's discretion in hot weather.

- Male staff should be cleanly shaven or, if facial hair is grown, it should be well maintained and trimmed as appropriate.

38. The following may be helpful in clarifying what is and what is not appropriate:

- No denim
- No revealing or excessively tight clothing
- No t-shirts (except PE staff) exceptions are for female staff who wear t-shirts in conjunction with other clothing
- No shorts (except PE staff)
- No combat or cargo trousers (except CCF uniforms)
- No leggings unless under an appropriate length skirt or dress
- No inappropriate footwear e.g. flip flops and trainers (except PE staff) which may contravene Health & Safety guidelines.
- Women's tops may be sleeveless but should not be 'strappy' (i.e. have narrow shoulder straps) or be strapless
- No large logos
- No clothes that are excessively worn or faded
- No clothes with rips or tears



## **JOB DESCRIPTION**

### **Designated Safeguarding Lead**

This job description and Seaford College's Employment Policies, terms and conditions for Teaching Staff set out the terms upon which you will be employed by The Johnson Trust Limited at Seaford College.

Seaford College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

This job description may be amended at any time following discussion between the Headmaster and member of staff, and will be reviewed annually as part of the performance management process.

**RESPONSIBLE TO:** Headmaster and Governing Body

**REPORTING TO:** Senior Deputy Head

**COMMITTEES:** Senior Management Team, Heads of Years and Housemaster/mistresses as required.

**PURPOSE:** To ensure that safeguarding and child protection in the school are effectively carried out both to meet and exceed statutory obligations

### **KEY RESPONSIBILITIES**

The Designated Safeguarding Leads have the responsibility to:

- a. Ensure that effective communications and liaison with Social Care and other agencies take place as appropriate in the event of staff having child protection concerns about a pupil, and to make a referral where suspected abuse has occurred.
- b. Ensure that the Headmaster, and all staff, members of the College Governing Body and others have regular training on child abuse and its main indicators and that they are aware of their own child protection responsibilities and those of the College. Any volunteers, or temporary staff, will be made aware of child protection arrangements and will also undergo appropriate training.
- c. Ensure that all new members of staff, new Governors and others are trained as soon as possible after joining the College.

- d. Ensure that the DSL, the DDSLs and the School Governing Body member responsible for child protection are properly trained and re-trained on a two-yearly cycle.
- e. Review annually the Safeguarding Policy and the efficiency with which related duties have been discharged.
- f. Ensure that where the school ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a detailed report is made to the Disclosure and Barring Service (DBS) within one month of the person leaving the school and to refer to the Police any cases where a crime may have been committed. The College Governing Body have noted that failure to make a report constitutes an offence which may result in the school being removed from the register of independent schools. The DMS will also liaise with the Headmaster to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- g. Provide, with the Headmaster, regular updates on child protection issues, training and changes in child protection policy and procedure.
- h. Ensure that they are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the College. This includes the oversight of filtering and monitoring in the College.

The Designated Safeguarding Lead will:

- e. Arrange to provide Safeguarding Training on a regular basis to all members of staff, as well as training any volunteers or temporary members of staff.
- f. Support, advise and liaise with staff in their safeguarding work.
- g. Ensure that any pupil who is subject to a child protection plan who is absent without explanation for two days is referred to their key Social Care Team.
- h. Liaise with, when appropriate (e.g. if the allegation is against the Head or the Designated Safeguarding Lead), the Chairman of Governors and/or the Governing Board member responsible (see procedures below).

The DSL and DDSLs will undergo appropriate training every two years in order to:

- a. Understand the assessment process for providing early help and intervention, for example, early help assessments.
  - b. Have a working knowledge of how the local authority conducts a child protection case conference and child protection review conference and be able to attend and contribute to these when required to do so.
  - c. Ensure that each and every member of staff has access to and understands the
- Seaford College

College's Safeguarding Policy and procedures, especially new and part time staff.

- d. Be alert to the specific needs of children in need, those with special educational needs and young carers.
- e. Be able to keep detailed, accurate, secure written records of concerns and referrals.
- f. Obtain access to resources and attend any relevant or refresher training courses.
- g. Obtain access to resources and attend any relevant or refresher training courses.
- h. Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.

The Designated Safeguarding Lead should ensure that the College's policy is known and used appropriately. In doing this they should:

- a. Ensure that the College Safeguarding Policy is reviewed annually, the procedures and implementation are updated and reviewed regularly and work with the College Governing Body regarding this.
- b. Ensure that the Safeguarding Policy is available on the College website so that parents are aware of the fact that referrals about suspected abuse or neglect may be made by the College.
- c. Link with the local West Sussex Safeguarding Children Partnership (WSSCP) to make sure that staff are aware of training opportunities and the latest policies on safeguarding.
- d. Where children leave the College ensure that their child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file.