

SAFEGUARDING (CHILD PROTECTION AND STAFF BEHAVIOUR) POLICY

INCLUDING EYFS AND BOARDING

Governors' Committee normally reviewing:	Governance Committee Board
Date formally approved by the Governors:	Autumn Term 2024 (interim changes Spring 2025)
Date policy became effective:	Autumn Term 2017 (previously two separate policies for Prep and Senior)

Period of Review:	Annually
Next Review Date:	Autumn Term 2025

Person responsible for implementation and monitoring:	Designated Safeguarding Lead
Other relevant policies: <ul style="list-style-type: none"> • Behaviour and Discipline Policy • Anti-bullying Policy • Safer Recruitment Policy • Addendums to this Policy (as a result of operating differently) • PSHE Policy • RSE Policy • Promoting the Welfare of Pupils Policy • Preventing Radicalisation Policy • Medical Policy • Online Safety and ICT Acceptable Use Policy 	<ul style="list-style-type: none"> • Positive Handling (Restraining) Policy <p>Prep School</p> <ul style="list-style-type: none"> • Drug (Substance) and Drug Education Policy (Prep) <p>Senior School</p> <ul style="list-style-type: none"> • Alcohol Policy (Senior) • Drugs and Drugs Testing Policy (Senior) <p>External policies</p> <ul style="list-style-type: none"> • Boarding Schools' Association

<ul style="list-style-type: none"> • Equality Policy (Pupils) • First Aid Policy • Administration of Medicines Policy • Social Media Policy • Crisis Management Policy • Search Policy • Permanent Exclusions (Expulsion) Policy 	Commitment to Care Charter
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The following Policy covers both schools and encompasses the Aims and Ethos of the Preparatory School and the Senior School

Aims and Ethos

SAFEGUARDING STATEMENT

Felsted is committed to maintaining a safe and secure environment for all pupils and a 'culture of vigilance' to safeguard and protect all in its care, and to all aspects of its 'Safeguarding (Child Protection and Staff Behaviour) Policy'.

EQUAL OPPORTUNITIES STATEMENT

The aims of the School and the principles of excellent pastoral care will be applied to all children irrespective of their race, sex, disability, religion or belief, sexual orientation, gender reassignment or pregnancy or maternity; equally these characteristics will be recognised and respected, and the School will aim to provide a positive culture of tolerance, equality and mutual respect.

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1. **STATEMENT OF INTENT**

The safety and wellbeing of all our pupils at Felsted School ('the School') is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. This also includes supporting and promoting the wellbeing and mental health of our pupils.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2024) ('KCSIE')
 - Disqualification under the Childcare Act 2006 (August 2018)
 - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (December 2023)
 - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Prevent Duty Guidance for England and Wales (December 2023)
 - The Prevent Duty: Departmental advice for schools and childminders (July 2015)
 - The use of social media for on-line radicalisation (July 2015)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (September 2021)
- National Minimum Standards for Boarding Schools (September 2022)
- Boarding Schools' Association - Commitment to Care Charter
- Children's Social Care National Framework (December 2023)
- Behaviour in schools (September 2022)
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (February 2024)
- Keeping children safe in out of school settings (April 2022)
- Digital and technology standards in schools and colleges (March 2023)
- After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)
- The Charity Commission Guidance Safeguarding and protecting people for charities and trustees (June 2022)]

In all matters relating to safeguarding and child protection the School will follow the locally agreed interagency procedures laid down by our own, or where appropriate the relevant child's, safeguarding partner arrangements. In Essex, these arrangements sit under the Essex Safeguarding Children Board (ESCB) and involve the following statutory partners:

- Essex County Council (ECC)
- Essex Police
- the 3 NHS integrated care boards (ICBs) covering Essex

In the event that the School is required to operate differently, the School will consider any changes required to the School's policy and safeguarding processes when compared to business as usual. If required, the School will put in place an Addendum to this policy in accordance with the Department for Education safeguarding guidance (statutory and non-statutory).

This policy is applicable to the whole school community.

All members of staff have a duty to safeguard and promote our pupils' welfare and must therefore read, understand and comply at all times with this policy. All school staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns and act immediately.

SAFEGUARDING AND CHILD PROTECTION

2. ROLES AND RESPONSIBILITIES

Governors

The Governing Body carries out an annual review of the School's Safeguarding (Child Protection and Staff Behaviour) Policy and procedures, with day-to-day issues being delegated to its leadership teams, which include the Heads and the Designated Lead for Safeguarding (DSL).

The Governing Body is responsible for:

1. ensuring there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare;
2. reviewing the procedures for, and the efficiency with which, the child protection duties have been discharged;
3. ensuring that any deficiencies or weaknesses in child protection arrangements are remedied without delay;
4. approving amendments to child protection arrangements in the light of changing regulations or recommended best practice.

The Governing Body will ensure that if there has been an allegation against a member of staff that may meet the harm threshold, the School will work with the Local Authority Designated Officer (LADO) to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

The Governing Body will also ensure that the School draws on the expertise of staff, including the Designated Safeguarding Lead (DSL), in shaping the School's safeguarding arrangements and policies.

Chair of Governors

Michael Beale
michael.beale@felsted.org

Governors for Safeguarding

Jane Crouch
jane.crouch@felsted.org

Patricia Wardell
patricia.wardell@felsted.org

Jane Crouch and Patricia Wardell are the board-level leads designated to take a lead in relation to the School's safeguarding arrangements. Their duties include:

Termly visit (including meeting with the DSL, DDSLs, the HR Manager and the Heads) to discuss:

- the biennial local authority safeguarding audit (this is to be reviewed by the Governance Committee and then circulated to all Board members)
- referrals to children's services (anonymised) in respect of the promotion of welfare and any themes emerging for future action
- any referrals to the Local Authority Designated Officer (LADO) and actions taken
- review of concerns that do not meet the harm threshold
- any specific themes or issues emerging in the School, such as sexual harassment, child-on-child abuse, FGM, online safety, radicalisation, racism, sexual abuse, and steps taken as a result
- logs of bullying, online safety, behaviour and restraint to check any trends/links to safeguarding matters
- review of online safety, including any themes emerging from monitoring and filtering reports

- any complaints, the timeframe in which they were resolved as well as the stage at which they were resolved
- any connection between any complaints/concerns and any safeguarding & welfare matters
- any trends of complaints/concerns
- training of DSL / DDSLs and members of staff
- feedback on how the pupils are listened to

During the termly visit the safeguarding governor's will also:

- talk to members of staff (including new staff) to ensure they are aware of child protection procedures
- look at staff files to check attendance at safeguarding training
- check the Single Central Record
- spend time with the Head of Compliance

The outcome of the discussions/tasks will be reported at the termly Governance Committee, including the Heads. This will supplement the reports from the DSL.

The Designated Safeguarding Lead (DSL) and Designated Teacher for Looked after Children

Nicola O'Brien
01371 822507 or 822543 or 822567,
nfsob@felsted.org or seniordsl@felsted.org or prepdsl@felsted.org
Mobile: 07581498869

Nicola O'Brien is the DSL at Felsted School (including EYFS). Nicola has been fully trained for the demands of this role in child protection and inter-agency working and is a member of the Senior Leadership Team.

The DSL can be contacted at any time on their school mobile number. During term time, the DSL and/ or DDSL will always be available for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the DSL can be contacted on their school mobile at any time.

Felsted Summer School Designated Safeguarding Lead

The School's arrangements for the Felsted Summer School are:

Kathy Martin
Assistant Director of Global
Education 01371 822748
kma@felsted.org
Mobile: 07581 498792

Full details of the DSL's role can be found in Annex C of KCSIE and include:

- To take lead responsibility for safeguarding and child protection matters in the School, including online safety and understanding the filtering and monitoring systems and processes in place, Prevent, child-on-child abuse and child exploitation.
- To maintain an overview of safeguarding within the School, to monitor the effectiveness of the School's policies and procedures in practice, to coordinate safeguarding (including child protection) procedures within the School, including online safety and understanding the filtering and monitoring systems and processes in place, to hold open channels of communication with local statutory agencies and to liaise closely with social services and other agencies as appropriate.
- To support staff in carrying out their safeguarding duties. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in their absence to the DDSL or the Heads or directly to local children's services.

- To maintain close links with the ESCB for Essex, work with other agencies in line with Working Together to Safeguard Children and report, termly, to the Governance Committee and at least once a year to the Board on safeguarding / child protection issues.

The DSL must:

- Know how to identify signs of abuse and when to make a referral in accordance with the procedures set out in this policy.
- Know the procedures and ensure that the correct action is taken.
- Know the role and responsibilities of the investigating agencies and how to liaise with them.
- Maintain a close working relationship with the Local Authority Designated Officer (LADO) and contact them not only over any appropriate referral, but also for advice as appropriate.
- Know the requirements of record keeping and ensure that the safeguarding / child protection records are kept up to date.
- Act as a source of support, advice and expertise for all staff.
- Raise awareness by ensuring that the School's policies and safeguarding culture are understood and put into practice.

The Deputy Designated Safeguarding Leads (DDSL)

Prep School:

Jeremy Fincher: jpf@felsted.org, 01371 822614 Mobile: 07581 498306

Lee Beskeen: ljb@felsted.org, 07593532259

Jacqueline Atkins: jaa@felsted.org, 01371 822662, Mobile: 07710 700690

Gemma Paine: gp@felsted.org, 01371 822728

Georgina Clifford-Smith: glcs@felsted.org, 01371 822515

Ben Gray: bjg@felsted.org

Senior School:

George Masters: gws@felsted.org, 01371 822708, Mobile: 07710 094842

Anna Salmon: als@felsted.org, 07960 099949

Francis Barrett: fmb@felsted.org, 07596868373

Summer School

Myrto Psomadakis: summeracademic@felsted.org, 01371 822525

Whilst the activities of the Designated Safeguarding Lead may be delegated to the Deputy DSLs, the ultimate lead responsibility remains with the DSL.

The Heads

Miranda Norris (Prep), 01371 822612, mjn@felsted.org

Chris Townsend, 01371 822606, cjt@felsted.org

- Will always be informed by the DSL of any Child Protection or safeguarding issues.
- Will act in place of the DSLs and DDSLs if they are unavailable.

Non school activities on school premises

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not

the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

The School ensures that safeguarding requirements are included in the hire agreement for use of the school premises as a condition of use and occupation of the premises and that failure by the provider to comply with this will lead to termination of the agreement.

The School requires those hiring the premises to have regard to the DfE's non-statutory guidance Keeping children safe in out of school settings (April 2022).

3. EXTERNAL AGENCIES

Safeguarding partner arrangements - **Essex Safeguarding Children Board (ESCB)**

<https://www.escb.co.uk/>

Children and Families Hub

<https://www.essex.gov.uk/children-young-people-and-families/report-concern-about-child>

If the child you are concerned about is at risk of immediate harm:

Call 0345 603 7627 and ask for the priority line. This number is open Monday to Thursday 9am to 5:30pm, and Fridays 9am to 4:30pm. For out of hours or bank holidays, call the Emergency Duty Team on 0345 606 1212.

Request for support: <https://www.essex.gov.uk/children-young-people-and-families/report-concern-about-child/make-request-support>

If you're not sure whether you need to make a request for support, call our consultation line on 0345 603 7627.

LADO

On duty referrals: 03330 139797 for new referrals.

The LADO on duty on the day of the referral will deal with any case that meets the LADO threshold.

Direct Line: 03330 139797.

Email: lado@essex.gov.uk

https://schools.essex.gov.uk/pupils/Safeguarding/Managing_allegations_in_the_Childrens_Workforce/Pages/ManagingAllegationsInTheChildrensWorkforce.aspx

Missing Education and Child Employment Service

Tel: 03330 322 962

Email: cme@essex.gov.uk

https://schools.essex.gov.uk/pupils/education_compliance/Pages/children_missing_education.aspx

OFSTED Whistleblowing

Tel: 0300 1233155 (8am to 6pm, Monday to Friday)

Email: whistleblowing@ofsted.gov.uk

<https://www.gov.uk/government/publications/whistleblowing-about-childrens-social-care-services-to-ofsted/sharing-concerns-and-information-with-ofsted-about-childrens-social-care-services>

OFSTED Safeguarding Children

Tel: 0300 123 4666 (Monday to Friday from 8am to 5pm)

Email: CIE@ofsted.gov.uk

Independent Schools Inspectorate

Tel: 0207 6000 100

Email: concerns@isi.net

Disclosure and Barring Service Referral

DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF

Tel :03000 200 190

Email: customerservices@db.s.gov.uk

<https://www.gov.uk/government/publications/db.s-referrals-form-and-guidance>

Teaching Regulation Agency

Teacher Misconduct, Ground Floor South, Cheylesmore House, 5 Quinton Road, Coventry CV1 2WT

Tel: 0207 593 5393

Email: misconduct.teacher@education.gov.uk

<https://www.gov.uk/guidance/teacher-misconduct-referring-a-case>

Child Exploitation and Online Protection

Make a report: <https://www.ceop.police.uk/ceop-reporting/>

www.ceop.police.uk/safety-centre/

NSPCC Whistleblowing Advice Line

Weston House, 42 Curtain Road London

EC2A 3NH

Email: help@nspcc.org.uk

Tel: 0800 028 0285

www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

Support and Advice about Extremism

Essex Police

Emergency: 999

Non-emergency number, advice and support: 101

Department for Education (concerns relating to extremism)

<https://report-extremism.education.gov.uk/>

Lead for Prevent and Channel - Essex County Council

Jo Barclay

Email: jo.barclay@essex.gov.uk

www.escc.co.uk/ Essex Schools Infolink - PREVENT Duty - Extremism and Radicalisation

Local Authority

Essex County Council

Jo Barclay, Head of Education Safeguarding and Wellbeing

Tel: 03330 131078

Email: jo.barclay@essex.gov.uk

<https://schools.essex.gov.uk/pupils/Safeguarding/Pages/Safeguarding.aspx>

NSPCC Report Abuse in Education Advice Line

Tel: 0800 136 663

Email: help@nspcc.org.uk

4. TYPES AND SIGNS OF ABUSE

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them in real life or by others (e.g. online). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse;
- emotional abuse;

- sexual abuse; and/or
- neglect.

Refer to **Appendix B** of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

Safeguarding incidents and/or behaviours can be associated with factors outside the School. All staff, and especially the DSL (or DDSLs), consider the context within which such incidents and/or behaviours occur.

Special Educational Needs and/or Disabilities

Pupils with SEND may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. Pupils with SEND are more likely to be abused by their peers. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

To address these additional challenges, the School has in place the following pastoral support measures:

- mentoring and counselling systems;
- Heads of Phase (Prep) and Housemaster/Housemistress (HM) (Senior) form strong relationships with children and families;
- individual pupil profiles highlight SEN and other potential concerns regarding communication difficulties to support children, listing suggested 'best approach';
- liaison with external agencies where appropriate;
- a category of 'additional welfare needs' on pupils' Individual Education Plans (IEPs); and
- small groups allowing for strong and supportive relationships between specialist staff and the pupils.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSL and named person with oversight for SEN.

Lesbian, gay, bisexual or gender questioning

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities. Pupils are signposted to the DSL, Head of Phase (Prep) or HM (Senior) as a trusted adult with whom they can be open.

Looked after children (and previously looked after children)

Looked after children (and previously looked after children) are a particularly vulnerable group. The School will ensure that prompt action is taken when necessary to safeguard these children and the governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

The DSL is the designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs are met. The School ensures that the designated members of staff have the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and others as necessary for local arrangements.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with those responsible (for example a virtual school head) to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

Mental health

Staff are made 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. The School has systems and processes in place for identifying possible mental health problems. The School's senior mental health lead is the Head of Wellbeing. Many of the School's staff have received Mental Health First Aid training and the School's Wellbeing Centre provides support to pupils by trained counsellors. School staff are well placed to identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one and how children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the School's procedures for dealing with concerns about a child.

5. SAFER EMPLOYMENT PRACTICES

The School is committed to safer recruitment processes and ongoing safer working practices. All staff at the School, including part-time staff, temporary and supply staff, music teachers, and sports coaches, are subject to the necessary statutory child protection checks before starting work, for example, an enhanced DBS check (including barred list), right to work checks, additional overseas checks (if necessary), prohibition checks, verifying identity, taking up references, checking work history, online searches and confirming medical fitness for the role. All governors, volunteers, contractors are also subject to the appropriate statutory vetting checks. Confirmation is obtained that appropriate child protection checks and procedures have been applied for any staff employed by another organisation working at the school / on the school site.

Full details of the School's safer recruitment procedures are in the School's [Safer Recruitment Policy and Process](#). The School maintains a single central record of pre-appointment checks for all staff, including teacher trainees on salaried routes, agency and third-party supply staff.

Visiting Speakers

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

Staff must not invite speakers into school without first completing a Visiting Speaker Form and obtaining permission from the Head (Prep) or the Senior Deputy Head (Senior).

Visitors who are invited to speak to pupils will be informed about our Preventing Radicalisation Policy and relevant vetting checks are undertaken. We undertake due diligence to ensure that visiting speakers are appropriate. Speakers will be supervised at all times and will not be allowed to speak to children without a member of staff being present.

Visiting speakers will be expected to understand that where appropriate their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. The School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

On attending the School, visiting speakers will be required to show original current photo identification. The School shall also keep a record of visiting speakers.

6. INDUCTION AND TRAINING

Induction and training (including online safety and the School's arrangements for filtering and monitoring) are in line with advice from the ESCB. Every new member of staff, including part-time, temporary and visiting staff working for the School, receives induction and ongoing training.

Policies and guidance

All staff are required to:

- Read and understand information contained in Part One (including Annex B) of KCSIE and confirm that they have done so.
- Read and understand the School's Safeguarding (Child Protection and Staff Behaviour) Policy (that includes the staff code of conduct and the School's response to children that are absent from education), whistleblowing procedures and the School's policies (as required) for online safety and ICT acceptable use, social media, behaviour, discipline and anti-bullying.

Each time KCSIE is updated by the Department for Education and / or the School's policies are updated, staff will be provided with updated copies and will be updated on the changes via INSET training (annually at the start of term) and operational staff briefings or via dedicated training sessions if the updates occur during term time. The School will ensure staff understanding by providing the information to all staff, followed up by training sessions that all staff are required to attend. The DSL carries out questionnaires with staff to check their understanding of KCSIE and the School's safeguarding policy and procedures.

Training

Training is provided to all 'staff' during induction and at least annually. Regular informal updates, at least termly, and often monthly, are provided to give staff the relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, termly INSET training for staff, training videos, newsletter updates, email, bulletins and staff meetings.

Training is in line with ESCB advice and includes:

- the role and identity of the DSL
- online safety (including the School's arrangements for filtering and monitoring)
- indicators of abuse
- the process for making referrals to children's social care
- what to do if a child tells a member of staff he/she is being abused, exploited or neglected
- how to manage a report of child-on-child sexual violence and sexual harassment
- response to children who go missing from education
- what to do if staff have a concern about the behaviour of another adult

Training also promotes staff awareness of early help (including the early help process and the role of staff in it), the School's procedures in relation to self-harm, children absent from an education, child sexual exploitation, child criminal exploitation, preventing radicalisation, bullying (including cyber bullying), domestic abuse, drugs, fabricated/induced illness, faith abuse, female genital mutilation (FGM), forced marriage, honour-based abuse, breast ironing, gangs and youth violence, gender-based violence/violence against women and girls (VAWG),

mental health, private fostering, radicalisation, sexual violence and sexual harassment between children, sending nudes and semi-nudes, child-on-child abuse, trafficking. Staff are made aware of the signs, symptoms and indicators of abuse and neglect and the action they are required to take where there are allegations or concerns of abuse and/or neglect or the child is at risk of serious harm.

The DSL receives updated DSL training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the ESCB approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of KCSIE. In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. The DDSLs and Heads are trained to the same standard as a DSL.

Safeguarding / child protection training is also given to volunteers and contractors attend a contractors' briefing.

Governors receive safeguarding and child protection (including online and filtering and monitoring) training annually and at induction. This training is to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. Governors are made aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty 23), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

The governors for safeguarding are trained DSLs.

7. PROMOTING AWARENESS AND TEACHING CHILDREN HOW TO KEEP SAFE

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and wellbeing for pupils. *All staff* have an important role in adhering to the standards of behaviour set out in our Safeguarding (Child Protection and Staff Behaviour) Policy and in enforcing our behaviour, discipline and anti-bullying policies.

The governors ensure that all pupils are taught about safeguarding through the curriculum, including online safety, relationships education, relationships and sex education and PSHE, to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. Time is allocated in PSHE to discussions of what constitutes appropriate behaviour and on why bullying, child-on-child abuse and lack of respect for others is never right. Assemblies, Chapel Services, tutorials and lessons are used to promote kindness, tolerance, mutual respect and understanding. Pupils are also taught about the safe use of technology and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. Pupils are also taught about healthy relationships; consent and that sexual violence and sexual harassment is always wrong. Further information about teaching children about online safety can be found in Section 13 ('Online Safety') of this policy.

All pupils know that there are adults they can turn to if they are worried, including their tutor, teacher, Head of Phase (HoP), Housemaster / Housemistress (HM), DSL/DDSL, Deputy Heads/Heads, medical staff, the Wellbeing Centre and the Chaplain.

If the School has concerns about a child there is always a recognised requirement for sensitive communication and staff members are aware of the need to avoid asking leading questions. Our support to pupils who have concerns about themselves or their peers includes the following:

- All pupils have access to a telephone enabling them to call for support in private.
- 'Who can I talk to' posters are displayed around the School.
- Our Medical Centre, our boarding houses and common room areas display advice on where pupils can seek help.
- We operate a peer counselling scheme whereby trained older pupils are encouraged to offer advice and support to younger pupils.
- We provide leadership training to our head boys/girls, prefects and leaders, which includes the importance of offering support and assistance to younger and to vulnerable pupils. Our prefect and league systems are regularly supervised by staff. They have been trained to ensure that they are suitable for their duties and do not abuse their roles, which are specified clearly in writing. In particular, prefects are given induction on appointment which includes how to contribute to the School's anti-bullying practice, how to respond to allegations of serious bullying or abuse and how to act if they hear allegations of abuse.
- We provide regular lessons to pupils on online safety and ensure that all pupils understand and adhere to the School's guidelines in this area. This takes place in PSHE, tutorials and computing lessons.
- For more details on cyber-bullying please refer to the School's anti-bullying policy. For more details on the Prevent Duty, please refer to the Preventing Radicalisation Policy. For more details on promoting online safety please refer to the Online Safety and ICT Acceptable Use Policy.

Early Help

All staff are expected to identify when a child may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Staff are made particularly aware of the potential need for early help for a child who:

- is disabled and 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 a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- has experienced multiple suspensions or is at risk of being permanently excluded from school;
- is frequently missing from education, care or from home;
- is misusing drugs or alcohol;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems, financial problems or domestic abuse;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is a privately fostered child;
- is at risk of so-called honour-based abuse such as Female Genital Mutilation or Forced Marriage.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the ESCB referral threshold. The DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept

under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

The School should be made aware by a local authority if a child has a social worker. The DSL will use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes, working together with external agencies as required in the best interest of the child.

8. PROCEDURES FOR DEALING WITH ALLEGATIONS OR CONCERNS ABOUT A CHILD

If staff have any concerns about a child's welfare, they should act on them immediately and speak to the DSL (or DDSL). This can be via the 'Report a Safeguarding Concern' form (via the Felsted internal homepage or Felsted Connect) or by telephone or emailing the DSL via the contact details in this policy and on all staff ID badges.

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The School treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. All our school staff are made aware of their duty to safeguard and promote the welfare of children in the School's care.

If staff suspect or hear an allegation or concern of abuse or neglect from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded via the School's safeguarding platform (My Concern). This record should include the date, detail of who reported the child, a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, any action taken (including whether this was referred and if not why not), the follow up provided to the person who reported the concern and any other notes of relevance. Where a report includes online elements, staff are reminded not to view or forward any illegal images of a child but note what has been reported.

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. The School manages this by providing ongoing pastoral and/or counselling support for the child and ensuring that their wishes are listened and adhered to.

Safeguarding information will often be special category personal data and the School will have due regard to the DfE Guidance: Information sharing: advice for practitioners providing safeguarding services for children, young people, parents and carers.

The School recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the DSL or the Head of Compliance.

The School will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) pupils' personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as special category personal data
- understanding that safeguarding of children and individuals at risk is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so.
- not providing pupils' personal data where the serious harm test is met.

What staff should do if they have concerns about a child

The School wishes to engender a culture of openness and safety. **Every member of staff, including part-time, temporary, visiting, contract and volunteer staff working in school is required to report any concerns about a child's welfare, should act immediately and should speak to the DSL.** If, in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken and staff should speak to the Head or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the Essex ESCB thresholds. Options will include:

- managing any support for the child internally via the School's own pastoral support processes;
- making an early help assessment; or
- making a referral for statutory services.

If a child's situation does not appear to be improving, the DSL (or the person who made the referral) should consider following local escalation procedures to ensure that their concerns have been addressed and to ensure that the child's situation improves.

Staff should not assume that a colleague or another professional will take action and share information that might be critical in keeping children safe. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

For children in need of additional support from one or more agencies, but who are not suffering or likely to suffer harm, the School will liaise appropriately with statutory agencies. The School will use local processes to engage other agencies, usually with input from the child and parents.

What staff should do if a child is in danger or at risk of harm

If staff (including governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is vital that an immediate referral to children's social care (and/or the Police if a crime has or may have been committed) is made in accordance with the Essex local authority referral process. A referral will be made within 24 hours of the safeguarding issue being raised. Initially, the DSL may phone the consultative line at the Children and Families Hub for advice about whether a referral should be made. However, if a child is deemed to be at risk of immediate danger then the priority line will be accessed, or 999 dialled and the police called.

Initial advice can also be obtained from the Children and Families Hub or Initial Response Team (details below). Anyone can make a referral to statutory agencies such as the police and children's social care.

If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

A full copy of Essex local procedures is available [Essex Safeguarding Children Board - SET Procedures](#).

What staff should do if a child is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999. Advice and support can also be sought from children's social care or by contacting Essex Police via 101.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Heads, DSL and DDSL and governors responsible for safeguarding to ensure that the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

What staff should do if they discover that Female Genital Mutilation ("FGM") has been committed

All staff should speak to the DSL or DDSL about any concerns about FGM. There is also a specific legal duty on teachers to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve children's social care and local safeguarding procedures be activated, as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy.

Where a teacher suspects that a pupil is at risk of FGM being carried out, teachers must personally report to the police. Unless the teacher has good reason not to, they should still consider and discuss any such case with the School's DSL (or DDSL) and involve children's social care as appropriate.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime.

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 School, 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, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the DSL to agree a course of action, although staff can make a direct referral to children's social care.

9. CHILD-ON-CHILD ABUSE

Child-on-child abuse is any form of physical, sexual, emotional and / or financial abuse, and /or coercive control, exercised between children and within children's relationships (both intimate and non-intimate). The School recognises the sexual bias of child-on-child abuse (i.e. that it is more likely that girls will be “victims” and boys “perpetrators”) and that it can manifest itself in many ways and can include (but is not limited to):

- Bullying – including cyberbullying, prejudice-based and discriminatory bullying
- Abuse (including emotional abuse) in intimate personal relationships between peers
- Physical abuse - which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual assault, sexual behaviours including sexual violence and sexual harassment between children
- Gender-based issues
- Causing someone to engage in sexual activity without consent - such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting
- Abuse linked to the sex of an individual - such as being sexually touched or initiation rituals
- Gangs and youth violence
- Initiation/hazing violence or rituals
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Sexual Violence and Sexual Harassment between Children

The School recognises that children of any age or sex are capable of sexual violence or sexual harassment towards other children. It can also occur online:

- Sexual Violence and sexual harassment can occur between two children, or a group of children and both sexes may be affected.
- Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal).
- Girls, children with SEND or certain health conditions and lesbian, gay, bisexual or children questioning their gender are more likely to be vulnerable.
- Sexual violence refers to rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent. These are sexual offences.
- Sexual harassment is unwanted conduct of a sexual nature and includes such things as sexual comments, sexual jokes, physical behaviour such as deliberately brushing against someone, or displaying photos of a sexual nature; and online activity including sharing of images or video (sexting/youth produced sexual imagery), upskirting, sexualised online bullying, sexual exploitation or making inappropriate sexual comments (this list is not exhaustive).

Arrangements for dealing with Child-on-Child Abuse

Child-on-child abuse can be associated with factors outside the School and can occur online and offline and between children of any age or sex. The School therefore takes a contextual safeguarding approach to managing child-on-child abuse. All child-on-child abuse will be taken seriously.

Child-on-child abuse is abuse and is never acceptable. It should never be passed off or dismissed as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”. The School will respond to all reports and concerns of child-on-child abuse.

The School has systems in place for pupils to confidently report abuse, including:

- Who can I talk to posters
- Report a concern button for pupils on the Felsted internal homepage
- Pastoral support system with tutors, HoPs / HMs, Wellbeing Centre and the DSL / DDSLs

Pupils and staff are made aware of the NSPCC bespoke helpline for children and young people who have experienced abuse at school, and for worried adults and professionals who need support and guidance. Anyone concerned about something can contact the NSPCC helpline Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. Any incidents that occur in the boarding setting will be responded to swiftly by the HM, in conjunction with the Senior Deputy Head (Senior) or Deputy Head (Prep) and the DSL.

The School takes the following steps to minimise the risk of child-on-child abuse:

- The expectations of pupils are made clear in the School aims and ethos and the School rules, behaviour charter and policies
- Tutorials, lessons, competitive sports and school activities are all based on pupils working together and teamwork and respectful collaboration are encouraged explicitly and implicitly
- Pupil led assembly/chapel services often focus on the importance of respect and tolerance

Any bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm and warrants a response under these procedures rather than the School's behaviour policies.

If the alleged incident has taken place away from school, the School's duties remain the same.

What to do if staff suspect that a child may be at risk or hear a report of child-on-child abuse

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly and will be investigated (with a written record made), including consideration of the wider context in which it may have occurred (as appropriate). The School treats all children involved (both victim and perpetrator) as being at potential risk and ensures that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. Immediate consideration will therefore be given as to how best to support and protect all children involved/impacted.

The School will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care.

The School should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse (both alleged victim and alleged perpetrator) will be supported by the DSL, the Wellbeing Centre and the Head of Phase (Prep)/HM (Senior). One-to one counselling is automatically offered in the case of child-on-child abuse and follow ups are carried out by the DSL. Support from external agencies will be sought, as appropriate. The School recognises that children with special educational needs and disabilities can be more prone to child-on-child group isolation than other children and will consider extra pastoral support for those children, including support from the SENCO.

“Victims” will be reassured that they are being taken seriously and that they will be supported and kept safe. A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from Essex ESCB on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged “victim” and “perpetrator”. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of Essex ESCB, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed.

Sexual Violence and Sexual Harassment between Children

The School will respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school premises, and / or online. Allegations of sexual violence or sexual harassment will always be taken seriously and dealt with on a case by case basis, with the DSL taking a leading role, and supported by outside agencies such as children's social care or the police.

Staff are made aware that sexual violence and sexual harassment can occur between children of any age and sex and are advised to maintain an attitude of ‘it could happen here’. If staff have any concerns about a child’s welfare, they should act immediately rather than wait to be told.

Where a report concerns an allegation of harmful sexual behaviours, if possible two members of staff should be present when managing a report (preferably one of them being the DSL or DDSL). The DSL or DDSL should be informed as soon as practically possible if they were not involved in the initial report. Where the report includes an online element, staff must not view or forward illegal images of a child. The School will follow the UKCIS (see Appendix A) advice for education settings.

Consideration of safeguarding all those children involved in the safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will consider the appropriate response. This will include:

- The wishes of the victim
- The nature of the alleged incident
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children
- If the alleged incident is a one-off or sustained pattern
- Any ongoing risks, including understanding intra familial harms and any necessary support for siblings following incidents
- Other related issues and context.

Any response and action will, as always, have at the centre the best interests of the child / children. The DSL will reassure any victim that they are being taken seriously, that they will be supported and kept safe and that the law is in place to protect children and young people. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The School will do everything possible to protect the anonymity of any children involved in any report, including the possible impact of social media.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged

perpetrator(s), or from future harms.

The DSL will consider as part of the School's response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will immediately be recorded and kept under review. The DSL will consider the risks posed to all pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, school premises (including boarding accommodation) and school transport. Any professional risk assessment will inform the School's approach.

Police may be informed of any harmful sexual behaviour including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. A report to the police will generally be made in parallel with a referral to children's social care. The School will follow the actions as detailed in Part 5 of KCSIE.

If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL (or DDSL) will also work closely with children's social care and other agencies as required to follow the local processes, ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and children's social care to ensure the welfare and safety of all children and update the risk assessment and ensure relevant protections and measures are in place for all children.

The School will consider whether disciplinary action may be appropriate for any child/children involved. Before deciding on appropriate action the School will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the School.

The DSL will ensure that where children move to another educational institution following an incident of child-on-child abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

How should staff respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (see Appendix A) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keeping them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process

An immediate referral to police and/or children's social care will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent, for example, owing to special educational needs.
- The images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The images involves sexual acts and any child or young person in the images or videos is under 13.
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

10. PROCEDURES FOR DEALING WITH CONCERNS/ALLEGATIONS OF ABUSE AGAINST STAFF, INCLUDING THE HEAD, DSL, VOLUNTEERS, SUPPLY STAFF, GOVERNORS AND CONTRACTORS, THAT MAY MEET THE HARM THRESHOLD

If staff have safeguarding concerns about another staff member (including the DSL, a governor, supply staff, agency staff, a volunteer, a contractor or other person connected

with the School), then this should be referred to the Head. Where there are concerns about the Head, or in the absence of the Head, this should be referred to the Chair of Governors.

STAFF

Allegations of abuse against staff, including the DSL, will be dealt with according to the statutory guidance set out in part four of KCSIE and Essex ESCB arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

Local Authority (ESCB SET procedures,) require that, where an allegation against a member of staff, that may meet the harm threshold, is received, the Head, senior named person or the Chair of Governors must inform the duty Local Authority Designated Officer (LADO) in the Children's Workforce Allegations Management Team on 03330 139 797 within one working day. However, wherever possible, contact with the LADO will be made immediately as they will then advise on how to proceed and whether the matter requires Police involvement. This will include advice on speaking to pupils and parents.

In borderline cases, the School will discuss informally with the LADO on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head and to the Head of HR (unless the Head of HR is the subject of the allegation). Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation. In the event where there is a conflict of interest in reporting the matter to the Head, this should be reported directly to the LADO, however, staff may consider discussing any concerns/allegations with the DSL and may make any referral via them.
2. The 'case manager' should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. The case manager will discuss with the LADO if an independent investigator is required. Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved.
3. Any pupils who are involved will receive appropriate care. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.

4. When to inform the individual, who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
 - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
 - providing an assistant to be present when the individual has contact with children;
 - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
 - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It should be made clear that this is not a punishment and parents have been consulted; or,
 - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, WT and KCSIE when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children.

6. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
7. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the staff member subject to the allegation.

8. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made). Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
9. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate. Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS. The Trustees will also consider their serious incident reporting duties to the Charity Commission.
10. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

The outcome of an investigation of an allegation will be recorded as per point 8 above. If it is established that the allegation is malicious or false, no details of the allegation will be retained on the individual's personnel records, unless the individual gives consent for the retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. The Head will consider whether any disciplinary action is appropriate against a pupil / staff member who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible if they are not a pupil.

Should non-recent (historical) allegations of child abuse be made the School will, in accordance with KCSIE, report the matter to the police and the LADO. Similarly, allegations against a teacher who is no longer working at the School will also be referred to the LADO and the police. All allegations of non-recent abuse should be referred to the Head or DSL straight away.

The School will assess the need and report accordingly to the Charity Commission, Boarding Schools' Association and to the School's insurers.

Procedure for managing allegations about supply teachers and contractors

The Schools procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business. The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

Dealing with safeguarding concerns and allegations about organisations using the school premises

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

The School will expect, where appropriate, providers to fully comply with the DfE guidance After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023) and will seek assurance in this regard.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

11. PROCEDURES FOR DEALING WITH CONCERNS ABOUT STAFF, INCLUDING THE HEAD, DSL, VOLUNTEERS, SUPPLY STAFF, GOVERNORS AND CONTRACTORS, THAT DO NOT MEET THE HARM THRESHOLD (LOW-LEVEL CONCERNS)

The School is aware that staff may have concerns that appear to them to be low level. Staff must still report any such concern to the Heads or DSL, to allow the School's safeguarding arrangements to be implemented and for the School to act accordingly. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

The purpose of the School's procedure for low-level concerns is to support a culture of openness, trust and transparency in which the School's values and expected behaviour are constantly lived, monitored and reinforced by all staff, including to:

- ensure staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empower staff to share any low-level safeguarding concerns;
- address unprofessional behaviour and support the individual to correct it at an early stage; and
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised.

Staff must share their concerns, no matter how small. A low-level concern can be any concern, even if no more than a 'nagging doubt', that an adult may have acted in a manner which:

- is not consistent with the Staff Behaviour Policy, including appropriate conduct outside of work; and/or
- relates to their conduct, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children; and / or
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to

- being over friendly with children;
- having favourites;
- 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.

Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Staff do not need to be able to determine whether a concern is a low-level concern, or if it meets a safeguarding threshold (for example is otherwise not considered serious enough to consider a referral to the LADO), that determination will be made by the Head.

If the concern has been raised via a third party, the Head will collect as much evidence as possible by speaking:

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

Reports of low-level concerns are recorded in writing, with details of the concern, the context in which it arose and action taken. The name of a person reporting will be noted, respecting wishes to remain anonymous as far as reasonably possible. Records of any concerns that do not meet the harm threshold are only accessible for the Heads and / or Deputy Heads, the DSL and Head of HR (as appropriate). Records of low-level concerns are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance

Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a collaborate decision-making approach

12. PREVENTING RADICALISATION

We recognise that it is a key role of the School to support children and that the School may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

Staff acknowledge the need for a culture of vigilance to be present in the School to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation. If staff have a concern that a child may be at risk, they should follow the procedures contained in this policy 'What staff should if a child is seen at risk of radicalisation',

The School's particular training requirements are included within the School's provision of Safeguarding training. For further details, please see the Preventing Radicalisation Policy.

13. ONLINE SAFETY

The School will ensure that:

- Children are taught about safeguarding, including online safety.
- Communication with parents is used to reinforce the importance of children being safe online.
- Staff are equipped with the knowledge to safeguard children online.
- Filtering and monitoring systems are in place and these are managed, implemented and responded to by the DSL, the Online Safety Officer and the Head of IT and reported on to the School's Governance Committee. The School ensures compliance with the DfE filtering and monitoring standards for schools by;
 - Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
 - Reviewing the filtering and monitoring provision at least annually.
 - Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.

Having effective monitoring strategies in place that meet our safeguarding needs.

The School's approach to online safety considers the identified areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

- contact: being subjected to harmful online interaction with other users; for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The School requires all users of the wireless network to login using their school supplied credentials. Users who access the network on a personal device must first register the device on the network. The School has filtering and monitoring systems in place to monitor online activity via the school systems and is able to identify individuals as part of this process. A reporting system is in place for the Designated Safeguarding Lead (DSL) and the Senior Leadership Team (SLT) to monitor online activity and easily identify any areas of concern. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

The School recognises the additional risks that children with SEND face online and works to ensure that additional support and measures are in place to support these children. Pupils with additional needs and where they may need support regarding awareness of appropriate relationships and online behaviour are identified. Online safety is an integral part of the School's curriculum and also embedded in PSHE and Relationships and Sex Education.

The School's Online Safety and ICT Acceptable Use Policy sets out the School's approach to online safety, and also includes detail on the use of mobile technology in school accessing 4G and 5G technology on school premises and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

Additional safeguarding arrangements are put in place if pupils are required to undertake online learning at home, with 'Online Learning Policy and Procedures for staff' and 'Online Learning Guidance for Parents'. Advice for keeping safe online and appropriate use of external sites is provided to pupils and parents via the pupils' Google Classroom, emails to parents and School newsletters.

14. CHILDREN WHO ARE ABSENT FROM EDUCATION

The School recognises that for children who are absent from school for prolonged periods and / or on repeated occasions, this is a potential indicator of a range of safeguarding possibilities.

Pupil absences are monitored and the School promptly addresses concerns about irregular attendance with the parent/carer.

Where reasonably possible the School holds more than one emergency contact number for each pupil so additional options are available to make contact with a responsible adult when a child goes missing.

The School will report to the Local Authority a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more. For further details, please see the Missing Child and Procedure (Prep), the [Missing Pupil Policy \(Senior\)](#) and the [Attendance Policy](#), including the School's duty to report the adding and deletion of a pupil's name to the admissions register.

15. EXCHANGES AND OVERSEAS VISITS

In the event that any pupils will be staying with a host family at any time during a trip, the following procedures will be followed.

The School will put in place appropriate measures to safeguard the pupil participating. The School will always consider the circumstances of the arrangements to determine if it is regulated activity requiring the School to carry out a DBS check including barred list information in respect of the responsible adult.

- Where the arrangement with a host family has been made by the School, this will be regulated activity and an Enhanced (including barred list) DBS check will be carried out.
- Where a host school has arranged the host family, confirmation will be required from the host school that they have carried out the appropriate Enhanced (including barred list) DBS check.
- Where parents have made arrangements themselves and the School does not have the power to terminate the agreement, then this will be a private matter between the child's parents and the host parents and there is no requirement for a DBS check to be carried out by the School.

For children staying with a host family overseas a DBS check will not be possible. The School will require confirmation from the host school (that has arranged the host family) that equivalent overseas checks and appropriate assurances have been obtained. This will be obtained before the visit.

In addition to DBS or equivalent overseas checks, the following arrangements will also be in place:

- Information is provided to parents and pupils about the arrangements.
- Contact details are provided to the pupil's family and the host family, both are encouraged to make contact prior to the visit.
- Sufficient support and procedures are in place if pupils have concern about their safety at any time, including contact details for Felsted School staff (and if applicable host school staff) and pupils have access to a telephone if needed.
- Arrangements are in place for pupils to see a Felsted School member of staff or dedicated member of staff from the host school every day.

16. PARENTS/GUARDIANS

In general, we believe that parents should be informed about any concerns regarding their children wherever it is safe to do so. It is important that we are upfront, transparent and honest in our dealings with parents. The sharing of information with parents will be in line with the DfE guidance Information Sharing: advice for practitioners providing safeguarding services for children, young people, parents and carers. In particular cases, it may not be right to inform parents/guardians of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the local authority.

17. RECORDING, MONITORING AND EVALUATING

The School's records on child protection are kept securely by the DSL, and are separated from routine pupil records. Access is restricted to the DSL, Deputy DSLs and the Heads.

Where a pupil leaves the School, the DSL will ensure that their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible, and within 5 working days for an in-year transfer or within the first 5 working days of the start of a

new term to allow the new school or college to have support in place for when the child arrives. The DSL will ensure secure transit (for example by a secure hard copy or electronic delivery method) and obtain confirmation of receipt.

The DSL will also consider, on a case by case basis, if it is appropriate to discuss and share any information with a new school or college before a pupil leaves, to help them put support in place for when the child arrives. The School will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

The School will have regard to the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) for the processing and sharing of personal information for the purposes of safeguarding.

Ongoing issues are monitored by the DSL and there will be regular monitoring of affected pupils after issues have been resolved.

STAFF BEHAVIOUR

Staff must report any concern about the behaviour of another member of staff to the Head (see section 10 and section 11 of this policy) to allow the School's safeguarding arrangements to be implemented and for the School to act accordingly.

This policy applies to all staff (including coaches, volunteers, casual staff, governors) regardless of their position, role or responsibility. All staff are required to read and comply with this policy. Breach of failure to observe this policy will be considered under section 10 or section 11 of this policy and may result in action being taken under the School's disciplinary procedures.

Staff should always be mindful of their location, and the company present, even when not on duty and off-site, they should uphold the values of the School. Any member of staff seen to be behaving in such a way that would bring the School into disrepute, including via social media can expect to be dealt with through the School's disciplinary procedures.

This policy is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this policy, staff are expected to exercise their professional judgement and act in the best interests of the pupils and the School.

18. STAFF BEHAVIOUR AND CODE OF CONDUCT

In general, staff should encourage pupils to discuss with their parents or guardians' issues that are troubling them. It may be appropriate to suggest that a pupil visits the Wellbeing Centre or member of the medical staff.

Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. Staff must maintain professional boundaries and act in a way that would not lead any reasonable person to question their actions or intent. They need to treat all pupils with respect and try, as far as possible, not to be alone with a child or young person. One-to-one conversations should always take place in purpose-specific rooms (eg music practice rooms, counselling rooms) if possible and follow a timetable that is known to others (eg HoD music, Deputy Head, Head of Wellbeing). If this is not the case, the door should be left open. Where possible, a gap or barrier should be maintained between teacher and child at all times. Where this is not possible, for example, in an instrumental music lesson, or sports coaching lesson, it is good practice to ensure that others are within earshot. Any physical contact should be the minimum required for care, instruction or restraint and appropriate to the child's age, stage of development and SEND they may have.

18.1 Position of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

Staff (including coaches, volunteers, casual staff, governors) are reminded that it is a criminal offence for a person aged 18 or over 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 the relationship is consensual. Even if the student is over 18 years of age, any such relationship would contravene this staff code of conduct.

On occasion, pupils may develop an infatuation for a member of Staff. If staff suspect or become aware of an infatuation, the advice of the Head or Deputy Head must be sought immediately. Other members of Staff must alert a colleague to the possibility of an infatuation in order that appropriate steps can be taken. Staff should deal with these situations sensibly and appropriately to maintain the dignity and safety of all concerned.

18.2 Respect

All parties are expected to treat one another with respect. The School believes that respect is earned through kind and appropriate treatment of one another, and not purely through age or status. All staff are expected to seek to behave in a positive manner towards every pupil, and to put the promotion of every child's wellbeing as a priority in all matters. There are rules and boundaries, and these need to be enforced in order to maintain good discipline and a strong community, but even when something goes wrong, every child should feel that they are respected, and that they are an important part of that community.

18.3 Communication with Pupils and Acceptable Use of Technologies, including the use of mobile phones and cameras to take images (please see the School's Online Safety and ICT Acceptable Use Policy)

All email communication between staff and pupils of the School on school business must be made from an official school email account (any deviation from this in an emergency must at once be reported to the line manager). Staff should not give out their personal contact details (such as mobile phone numbers and email addresses). Staff should not use personal email accounts or personal mobile phones to make contact with pupils of the School, nor should any such contact be accepted, except in circumstances listed below.

Where images are taken by staff to give evidence of children's progress, the images can only be used for this purpose. Images taken for the purpose of promotion and/or publicity of the School may only be published where parental (Prep) or pupil (Senior) permission is provided via the consent form.

Staff cannot use or post or pass on images of pupils via or to any third party without an approved sharing arrangement or lawful basis in place.

Pre-Prep / Stewart House (including EYFS and KS1)

Staff, volunteers and visitors are not permitted to use a personal mobile or other personal device to make telephone calls (outside of the staff only area), take photographs or videos at any time.

This includes the following areas:

- Stewart House
- Swimming pool
- Changing room
- School grounds
- Forest School area
- Whilst on School trips

A telephone is available at the Stewart House office for emergency calls and school devices are available to use while on the school site or for trips off site.

Staff must keep personal devices out of reach and out of sight. Staff and volunteers' personal phones must be stored with personal belongings in the staff storage area. If staff see an adult with a personal portable electronic device whilst children are present this must be reported to Mrs J Atkins (Head of Pre-Prep) jaa@felsted.org

Within the Pre-Prep (EYFS), neither staff, children nor parents may use their personal mobile phones to take photographs.

Prep and Senior School (Year 3 and above)

The School allows staff to bring in personal mobile phones and devices for their own use. Use of personal devices must not interfere with staff duties. Personal mobile telephones and cameras should be kept out of reach and out of sight and not be used when members of staff are teaching or involved in an activity with the pupils. Their use should be limited to break times or such other times when staff are not carrying out teaching, supervisory or similar duties.

While we recognise that there are times when staff will need to use a mobile phone around the site, this should be in order to carry out their role and staff should, whenever possible, model the behaviour that they expect to see from pupils with regards to mobile phone use.

The School does not allow a member of staff to contact a pupil or parent/carers using their personal device, except in exceptional circumstances such as in an emergency on school trips or away matches that (where possible) have been given prior approval by the Head.

The use of school provided (or in an exceptional circumstance as above, personal) mobile phones by staff to contact children can only be for the better preferment of their professional duties. The group leader on all trips and visits involving an overnight stay should take a School mobile phone with them and may ask the pupils for their mobile numbers before allowing them out in small, unsupervised groups. The School mobile should be used for any contact with pupils that may be necessary. Where pupil mobile numbers are taken for the purpose of school trips and away days, the member of staff in charge of the excursion will ensure any record of pupils' mobile phone numbers are securely deleted at the end of the trip or visit and will ensure that pupils also delete any staff numbers that they may have acquired during the trip.

The School Boarding House phones hold the numbers of the boarders and their families.

Staff must not take images of pupils on their personal device for any reason. There are no exceptions to this. Staff should use a school device to take any images of pupils. School provided digital cameras or devices are available and must only be used for a particular purpose, such as to display a pupil's work, where it is necessary to record pupil progress or as part of the Schools Taking, Storing and Using Images Policy or Social Media Policy.. Images must be downloaded to a school google account as soon as reasonably possible (as soon as the member of staff can access their school google account) and must then be permanently deleted from the school device.

Staff are strictly prohibited from bringing or accessing any inappropriate or offensive material, such as indecent images and/or pornography, on the school site or at any other time they are on duty (such as school trips). Staff must not use school property or the school network to access any such material. If staff discover any material that is potentially illegal or inappropriate, they must immediately contact the DSL in accordance with this policy.

Staff should be aware that it is not appropriate to use social media to communicate with pupils. Staff should not request or accept any current student of the School of any age or any ex-student of the School under the age of 18 as a friend, follower, subscriber or similar on any personal social media account unless they are the parent of the pupil or a close family member or family friend. Please see the Online Safety and ICT Acceptable Policy and the Social Media Policy for staff obligations in relation to electronic communication with pupils.

18.4 Home Visits

If a member of staff needs to visit a pupil in their own home the Home Visits Policy must be followed, including informing the DSL and the HM/HoP. The only exceptions to the Home Visit Policy would be if there were a private arrangement whereby a member of staff has connections with a pupil, either because they are friends of their parents or if the pupil is a friend of the member of staff's own child.

18.5 Physical contact with pupils

There are occasions when it is appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role and

the age, maturity and any SEND or vulnerabilities the pupil may have.

Physical contact may be appropriate in the following circumstances:

- when a pupil needs to get comfort or reassurance e.g. following an accident or personal crisis;
- when a pupil needs encouragement to attempt a new challenge e.g. to climb on to a piece of apparatus; or
- when there is a need to take urgent action to avoid an incident or injury.

Staff should, therefore, use their professional judgement at all times. Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.

A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, the DSL informed and, if appropriate, a copy placed on the pupil's file.

18.6 Physical Restraint

Any physical restraint is only permissible to prevent a pupil from hurting themselves or others, from damaging property, or from causing disorder. Physical restraint should be a last resort when all efforts to diffuse the situation have failed. Only the force that is needed must be used (i.e. it must be a reasonable use of force)

The School recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND or with medical conditions. The School will consider its duties under the Equality Act 2010. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

Staff are required to follow the School's Positive Handling (Restraining) Policy. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the Head.

Where this relates to the School's EYFS provision, parents will be informed of any physical restraint used on their child the same day or as soon as reasonably practicable. In all other circumstances, the Head will consider whether it is appropriate to report the use of force to parents.

Suspension will not be an automatic response when a member of staff has been accused of using excessive force. The School will follow the process set out in Section 10 of this policy, where an allegation of using excessive force is made against a teacher.

There may be times when a pupil or a pupil's belongings need to be searched and there are reasonable grounds to conduct a search. In such circumstances the guidelines set out in the School's Search Policy must be followed, including a search only carried out by a trained member of staff authorised by the Head.

18.7 Activities requiring physical contact

Where exercises or procedures need to be demonstrated, extreme caution should be used if the demonstration involves contact with pupils and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will, on occasions, have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the

pupil's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

18.8 Boarders access to staff accommodation

Boarders must not have access to staff residential accommodation, other than in exceptional circumstances. Where this occurs, a one-to-one situation should be avoided with boarders with another adult always present. There must be no inappropriate favouritism or inappropriate one-to-one contact between staff and boarders.

Identification and demarcation of shared spaces, buffer zones and private staff residential accommodation is in place, along with a school-wide risk assessment and guidelines for access and acceptable use of these areas by boarders in exceptional circumstances. The only staff who can be authorised are the Head, Deputy Head and HMs, who must first obtain permission from the Senior Deputy Head / Prep Deputy Head (or Head) to hold an event in exceptional circumstances, for example a rewards dinner following publication of internal reports. The event must be added to the 'NMS 20.10 Log' in advance of an event.

The guidelines above do not apply to private family arrangements, for example a friend of the child of a staff member visiting the family home.

18.9 Transporting pupils

Staff should avoid taking one pupil on their own in a car. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles. If there are exceptional circumstances that make unaccompanied transportation of pupils in a private vehicle unavoidable the Deputy Head or the DSL should be notified and the parents' permission given.

It is recommended that for School trips and outings there is with at least one member of staff additional to the driver, acting as an escort.

Staff must adhere to the requirements set out in the Alcohol and Illegal Drugs section below.

18.10 Confidentiality

Staff members should never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear need to know.

19. STAFF DAILY CONDUCT REQUIREMENTS

19.1 Attendance and Timekeeping

Should a staff member need to be absent or expect to be late for any reason, he/she should ask their line manager / Head of Department in advance when possible. Teaching staff should enter their absence via the relevant procedure for Pre-Prep, the Prep School or the Senior School. All staff must follow the staff sickness absence from work procedure, available via the internal homepage.

19.2 Smoking

To promote a healthy and pleasant working environment and because of the fire risk, smoking is only allowed in designated areas on site.

19.3 Alcohol and Illegal Drugs

Consumption of alcohol or illegal drugs is not permitted on site save where, in the case of alcohol, at a school function or otherwise agreed when modest amounts of alcohol may be consumed. When a member of staff has responsibility for supervising older pupils at a school event, they must not drink more than a very small amount of alcohol and certainly not more

than the legal drink-driving limit.

Staff must not be under the influence of alcohol while driving a school vehicle or driving pupils in their own vehicle (see Transporting pupils' section above), even if within the legal drink/drive limit.

Staff who reside on site may consume modest quantities of alcohol in private accommodation when they are not on duty.

19.4 Security

In the interests of security, employees must wear their identity card at all times while on the school site. Any staff with access to pupil, staff or other personal data must follow the School's Data Protection Staff Guidance, available via the School's internal policy area.

The School reserves the right to search the outer clothing, bags, lockers and vehicles etc. of staff members whilst on site. The staff member may have a colleague in attendance on such (rare) occasions.

19.5 Personal Appearance

The School regularly receives visits from parents, potential parents and others, and naturally wishes to convey an impression of efficiency and organisation. Therefore whilst not wishing to impose unreasonable obligations on staff they are, nonetheless, required to look smart in appearance as required for the role.

19.6 Mobility and Flexibility

Due to the demands and nature of the School, staff should be prepared to transfer upon request within departments either temporarily or permanently, to undertake work of a different nature, providing it is reasonable and safe to do so and the staff member is adequately trained.

20. EQUAL TREATMENT

We are committed to equal treatment for all staff and pupils regardless of their race or colour, nationality or national or ethnic origins, religion or belief, sex, sexual orientation, pregnancy or maternity, marital or civil partnership status, gender reassignment, age, and disability

We aim to create a friendly, caring and perceptive environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each pupil. Our staff undertake regular consultation activities with our pupils e.g. through tutorials, house and school council meetings, questionnaires, as well as class and informal discussions.

21. BULLYING

Bullying (including cyber bullying), harassment and victimisation and discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the School. Any kind of bullying is unacceptable and the School keeps a record of any incidents.

22. WHISTLEBLOWING (see section 10 and section 11 of this policy and the Whistleblowing Policy)

If a teacher or member of staff has concerns about the behaviour of another member of staff, including the DSL, towards a pupil, they should report it at once to the Head or to the Chair of Governors in the absence of the Head or where the concern relates to the Head.

Any concern will be thoroughly investigated under the School's whistleblowing procedures. Where there are allegations of criminal activity, the statutory authorities will always be

informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation.

Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding regimes, these should be raised in accordance with the School's whistleblowing procedures. If staff and volunteers feel unable to raise an issue with the School, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally. Staff can call 0800 028 0285 on Monday- Friday (8am - 8pm) or email help@nspcc.org.uk

No one who reports a genuine concern in good faith needs to fear retribution. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

Where staff have concerns that appear to them to be low level. Staff must still report any such concern to the Heads, as per section 11 of this policy, to allow the School's safeguarding arrangements to be implemented and for the School to act accordingly.

MONITORING

23. COMPLAINTS

The School Complaints Policy can be found on the School website and copies of the School's complaints procedure can be sent to any parent on request. Any complaint arising from the implementation of this policy will be considered under the School's complaints procedure.

24. MONITORING AND EVALUATION OF THIS POLICY

The School monitors and evaluates its Safeguarding (Child Protection and Staff Behaviour) Policy and procedures through the following activities:

- Governing body visits to the School, including termly visits by the safeguarding governors
- Frequent scrutiny of governing body meeting minutes
- Senior leadership team discussion with pupils and staff
- Pupil questionnaires
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the School (e.g. sufficient account must be taken of the nature, age range and other significant features of the School, such as historical issues, in the provisions made for safeguarding)
- Logs of bullying and/or behaviour incidents are reviewed regularly by the senior leadership team and the governing body
- Review of parental concerns and parental questionnaires
- Review of the use of pupil-specific leisure rooms (eg common rooms)

The DSL ensures this policy is reviewed annually, made available to parents and published on the School website and the procedures are updated and reviewed regularly.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority Designated Officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

Appendix A

Further information

Boarding School Commitment to Care Charter

<http://www.boarding.org.uk/467/about-the-bsa/safeguarding>

Information Sharing

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Sharing nudes and semi-nudes: how to respond to an incident

Sharing nudes and semi-nudes: advice for education settings working with children and young people

Online safety advice for pupils, parents and teachers

DfE advice for schools: Teaching online safety in schools

DfE: Filtering and monitoring standards

www.thinkuknow.co.uk

<http://www.saferinternet.org.uk/>

<https://www.internetmatters.org/>

<https://www.gov.uk/government/publications/education-for-a-connected-world>

Cyberbullying

<https://www.childnet.com/resources/cyberbullying-guidance-for-schools/>

Preventing radicalisation

educateagainsthate.com

www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

Early Help - Essex Effective Support Windscreen

<https://www.escb.co.uk/media/1487/effective-support-windscreen.pdf>

Prevent Duty Guidance

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Channel General Awareness course

https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html

NSPCC Safeguarding and child protection in schools

<https://learning.nspcc.org.uk/safeguarding-child-protection-schools>

Acceptable use of Technologies

<https://saferinternet.org.uk/guide-and-resource/teachers-and-school-staff/professional-reputation>

Harmful online challenges and online hoaxes

<https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes>

LGFL 'Undressed' advice

<https://undressed.lgfl.net/>

Forced Marriage

<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>

County Lines Toolkit

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance - Sept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf)

Harmful Sexual Behaviours

<https://www.mariecollinsfoundation.org.uk/>

Abuse

<https://www.csacentre.org.uk/knowledge-in-practice/practice-improvement/supporting-practice-in-tackling-child-sexual-abuse/>

Appendix B - Signs and types of abuse

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.²¹⁶

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.²¹⁸ Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. ²¹⁹ Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Sexual harassment: is unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.²²²

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.²²³

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apples AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include dick pics or pics or may be referred to by adults or professionals as youth produced/involved sexual imagery, indecent imagery, image based sexual abuse or sexting. Terms such as deep fakes and deep nudes may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include:
 - children and young people selling nudes or semi-nudes of others online
 - children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
 - children and young people hacking a peers account to share images more widely without consent to publicly shame
 - children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as aggravated or experimental. The DDCMS / UKIS guidance “Sharing nudes and semi-nudes: advice for education settings working with children and young people” (February 2024) sets out the classification of incidents, and how each should be handled.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

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

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, 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 children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, unexplainable and/or persistent absences from education and sexting put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which 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 activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any persons (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled “Child sexual exploitation: guide for practitioners”.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff 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.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as plugging, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a trap house or cuckooing or hotel room where there is drug activity;
- owe a debt bond to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance “Modern slavery: how to identify and support victims (May 2022)”.

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either cyber-enabled (crimes that can happen off-line but are enabled at scale and at speed on-line) or cyber dependent (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal hacking), for example accessing a schools computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DdoS) attacks or booting. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover cyber-enabled crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, NPCC- When to call the Police and National Cyber Security Centre NCSC.gov.uk.235

Mental health: all staff should 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, 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.

Where children have suffered abuse, exploitation and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL (or DDSL).

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young Peoples Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

So called honour based abuse: encompasses 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. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupils return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or DDSL) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

There is a statutory duty on teachers to personally report to the police²⁴⁰ where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) [? or it involves a pupil over 18], teachers should follow the Schools local safeguarding procedures.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. 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 and 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 disabilities, for example). Nevertheless, some communities use religion and culture as a way 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 18th 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.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023). Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email. fmu@fcdof.gov.uk

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

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

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

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the Channel programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions: Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, gay, bisexual or gender questioning: A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the pupil's individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will adopt (to the extent that it is reflected in KCSIE), the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Domestic abuse: The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as teenage relationship abuse. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Acts provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who are absent from school: A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called honour-based abuse or risk of forced marriage. Staff must follow the Schools procedures for dealing with children who are absent, particularly persistently or for prolonged periods.²⁵² The Schools procedure for dealing with children who are absent and/or missing can be found in the School's missing pupil policies and Attendance Policy. All unexplained absences will be followed up in accordance with the Attendance Policy.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

The Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment.

The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.