



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 2022
Date policy became effective:	Autumn Term 2017 (previously two separate policies for Prep and Senior School)

Period of Review:	Annually
Next Review Date:	Autumn Term 2023

Person responsible for implementation and monitoring:	Designated Safeguarding Leads
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 • Equality Policy (Pupils) • First Aid Policy • Administration of Medicines Policy • Social Media Policy • Crisis Management Policy • Search Policy • Permanent Exclusions (Expulsion) Policy • Positive Handling (Restraining) Policy 	Prep School <ul style="list-style-type: none"> • Drug (Substance) and Drug Education Policy (Prep) Senior School <ul style="list-style-type: none"> • Alcohol Policy (Senior) • Drugs and Drugs Testing Policy (Senior) External policies <ul style="list-style-type: none"> • Boarding Schools' Association Commitment to Care Charter

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.

CONTENTS

1. STATEMENT OF INTENT	4
SAFEGUARDING AND CHILD PROTECTION	
2. ROLES AND RESPONSIBILITIES	5
3. EXTERNAL AGENCIES	7
4. WHAT IS SAFEGUARDING?	9
5. TYPES AND SIGNS OF ABUSE	9
6. SAFER EMPLOYMENT PRACTICES	12
7. INDUCTION AND TRAINING	13
8. PROMOTING AWARENESS AND TEACHING CHILDREN HOW TO KEEP SAFE	14
9. PROCEDURES FOR DEALING WITH ALLEGATIONS OR CONCERNS ABOUT A CHILD	15
10. CHILD-ON-CHILD ABUSE	18
11. PROCEDURES FOR DEALING WITH CONCERNS/ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF THAT MAY MEET THE HARM THRESHOLD	22
12. PROCEDURES FOR DEALING WITH CONCERNS ABOUT TEACHERS AND OTHER STAFF THAT DO NOT MEET THE HARM THRESHOLD (LOW LEVEL CONCERNS)	24
13. PREVENTING RADICALISATION	25
14. ONLINE SAFETY	26
15. ABSENCE AND CHILDREN MISSING FROM EDUCATION	27
16. ACTION IF A PUPIL IS MISSING	27
17. EXCHANGES AND OVERSEAS VISITS	27
18. PARENTS/GUARDIANS	28
19. RECORDING, MONITORING AND EVALUATING	28
STAFF BEHAVIOUR	
20. STAFF BEHAVIOUR AND CODE OF CONDUCT	29
21. STAFF DAILY CONDUCT REQUIREMENTS	33
22. EQUAL TREATMENT	34
23. BULLYING	34
24. WHISTLEBLOWING	34
25. COMPLAINTS	35
26. MONITORING AND EVALUATION OF THIS POLICY	35
Appendix A	36
Appendix B	38

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 2022) ('KCSIE')
 - Disqualification under the Childcare Act 2006 (July 2018)
 - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (July 2018)
 - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Prevent Duty Guidance for England and Wales (April 2021)
 - 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
- National Minimum Standards for Boarding Schools (September 2022)
- Boarding Schools' Association - Commitment to Care Charter

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. The partnership arrangements for the Essex local authority are referred to as the Essex Safeguarding Children Board (ESCB).

In the event 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 carry out an annual review of the Schools' 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 Leads for Safeguarding (DSLs).

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 Leads (DSLs), in shaping the School's safeguarding arrangements and policies.

Chair of Governors

Mr Rob Brown
rob.brown@felsted.org

Governors for Safeguarding

Mrs Jane Crouch
jane.crouch@felsted.org

Mrs 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 and their duties include:

Termly visit (including meeting with the DSLs, 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) in respect of staff/volunteers and actions taken
- review of concerns in respect of staff / volunteers, 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/e-safety, radicalisation, racism, sexual abuse and steps taken as the result
- logs of bullying, online safety/e-safety, behaviour and restraint to check any trends/links to child protection matters
- 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 DSLs and members of staff
- feedback on how the pupils are listened to

During the termly visit the safeguarding governor will also:

- talk to new members of staff to ensure they are aware of child protection procedures
- look at staff files to check attendance at child protection training
- check the centralised register (and give feedback to the Heads and to the governors, if there are any issues)
- spend time with the Compliance Manager

The outcome of the discussions/tasks will be reported at the termly Governance Committee. This will supplement the reports from the DSLs.

The Designated Safeguarding Leads (DSL)

Nicola O'Brien is the DSL at Felsted Senior School and **Jacqueline Atkins** is the DSL for Felsted Preparatory School (including EYFS). They have been fully trained for the demands of this role in child protection and inter-agency working. They are members of the senior leadership team for their respective school.

*Prep School: **Jacqueline Atkins***

01371 822567 or 822661

jaa@felsted.org or prepdsi@felsted.org

Mobile: 07710700690

*Senior School: **Nicola O'Brien***

01371 822507 or 822543,

nfsob@felsted.org or seniordsl@felsted.org

Mobile: 07581498869

The DSL can be contacted at any time on their school mobile number. The DSL or Deputy DSL ('DDSL' - see below) will always be available to discuss safeguarding concerns. 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 DSLs can be contacted on their school mobile at any time.

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

Felsted Summer School, Designated Safeguarding Lead:

Director of Global Education

01371 822748

dpe@felsted.org

Mobile: 07775159667

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, 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 Child Protection procedures within the School, including online safety, to open channels of communications 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 child protection issues.

The DSL's and the Schools' focus is to support children in need through seeking early help and/or inter agency working, including using the Team around the Child approach. The DSLs are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

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 Child Protection Register and records are kept up to date.
- Act as a source of support, advice and expertise for all staff.
- Raise awareness by ensuring the School's policies are understood and put into practice.

The Deputy Designated Safeguarding Leads (DDSL)

Prep School:

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

Senior School:

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

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 also act in place of the DSLs and DDSLs if they are unavailable.

3. EXTERNAL AGENCIES

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

<http://www.escb.co.uk/en-gb/home.aspx>

Children and Families Hub

Tel: 0345 603 7627

Email: FOH@essex.gcsx.gov.uk

Online Request for Support Form: <https://www.essexeffectivesupport.org.uk/request-support/OR>

https://schools.essex.gov.uk/pupils/Safeguarding/Child_Protection_Referrals/Pages/Safeguarding-Key-Service-Contact-Information.aspx

Out of Hours Emergency Duty Team

Tel: 0345 606 1212

Email: Emergency.DutyTeamOutOfHours@essex.gov.uk

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](https://schools.essex.gov.uk/pupils/Safeguarding/Managing%20allegations%20in%20the%20Childrens%20Workforce/Pages/ManagingAllegationsInTheChildrensWorkforce.aspx)

Missing Education and Child Employment Service

Tel: 03330 322 962

Email: cme@essex.gov.uk

[https://schools.essex.gov.uk/pupils/Attendance Compliance/Pages/ChildrenMissingFromEducation.aspx](https://schools.essex.gov.uk/pupils/Attendance%20Compliance/Pages/ChildrenMissingFromEducation.aspx)

OFSTED Whistleblowing

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

Email: whistleblowing@ofsted.gov.uk

Disclosure and Barring Service Referral

Tel :03000 200 190

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

Teaching Regulation Agency

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)

www.educateagainsthate.com/resources/dfes-counter-extremism-helpline/

Essex County Council – lead for Prevent and Channel

Jo Barclay

Email: jo.barclay@essex.gov.uk

www.escb.co.uk/

Local Authority

Essex County Council

Jo Barclay

Tel: 03330 131078

Email: jo.barclay@essex.gov.uk

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

Report Abuse in Education

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

4. WHAT IS SAFEGUARDING?

Safeguarding legislation and government guidance provides that safeguarding and promoting the welfare of children means:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children and young people to have the best outcomes

The School is committed to helping our pupils develop the skills to make safe and healthy choices and develop into caring and compassionate members of a democratic and free society.

We recognise that the School plays a significant part in the prevention of harm to our pupils (including online) by providing good lines of communication with trusted adults, supportive friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role the School plays in recognising and protecting our children who may be vulnerable to harm, including radicalisation or exposed to extremist views.

Where there is a safeguarding concern, the School will ensure that the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide, with systems in place for children to express their views and give feedback. The School operates its processes in the best interests of the pupils.

5. 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. via the internet). 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.

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

Neglect

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

Emotional Abuse

Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child. It is sometimes called psychological abuse and can cause severe and adverse effects on a child's emotional health and 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse

A child is sexually abused when they are forced or persuaded to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. This doesn't have to be physical contact (it 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), and it can happen online with technology used to facilitate offline abuse. Sometimes the child won't understand that what is happening to them is abuse. They may not even understand that it is wrong. Sexual abuse is usually perpetrated by adult males but women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Online Abuse

Online abuse is any type of abuse that happens online, whether through social networks, playing online games or using mobile phones. Children and young people may experience, for example, cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming), or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online). Children can feel like there is no escape from online abuse, abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

Physical Abuse

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

Child-on child Abuse

Children can abuse other children (often referred to as child-on-child or peer on peer abuse) and it can take many forms. It can happen both inside and outside of school/college and online. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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 and initiation/hazing type violence and rituals.

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 and LGBT children 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).

Specific Safeguarding Issues

Behaviours linked to drug taking, alcohol abuse, truanting and sexting/youth produced sexual imagery put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting/youth produced sexual imagery. Safeguarding issues can also be linked to, for example, children missing education; children required to give evidence in court; children with family members in prison; child sexual exploitation; child criminal exploitation; domestic violence; serious violence/violent crime; homelessness; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; so called honour based abuse; hate; mental health; preventing radicalisation; relationship abuse; sexting/youth produced sexual imagery; and trafficking.

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 and Transgender (LGBT)

Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Pupils are signposted to the DSLs, 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, along with the Heads of Phase (Prep) and the HM (Senior), 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 receive appropriate training in order to carry out their role and 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.

6. SAFER EMPLOYMENT PRACTICES

The School is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, music teachers, and sports coaches, are subject to the necessary statutory pre-appointment 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 working regularly during term-time 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 with the Schools' pupils at school or on another site.

Full details of the School's safer recruitment procedures for checking the suitability of staff, governors and volunteers (including EYFS) is in the Schools' 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.

7. INDUCTION AND TRAINING

Induction and training (including online safety) are in line with advice from the Essex Safeguarding Children Board. Every new member of staff, including part-time, temporary and visiting staff working for the School, receives induction and ongoing training.

All staff are required to:

- Read and understand information contained in Part One or Annex A (as required) of KCSIE and confirm that they have done so.
- Read and understand the School's Safeguarding (Child Protection and Staff Behaviour) Policy (that includes staff code of conduct), 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 updated on the changes via INSET training (annual and 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 DSLs carry out questionnaires with staff to check their understanding of KCSIE and the School's safeguarding policy and procedures.

Training is in line with ESCB advice and includes:

- the role and identity of the DSL
- online safety
- 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

Training also promotes staff awareness of early help (including the early help process and the role of staff role in it), the School's procedures in relation to self-harm, children missing in 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, sexting/youth produced sexual imagery, 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.

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.

The DSL receives updated child protection 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 DDSs and Heads are trained to the same level as the DSL.

Child protection training is also given to volunteers and contractors attend a contractors briefing.

Governors receive safeguarding and child protection (including online) 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 21, the Equality Act 2010, (including the Public Sector Equality Duty²³), and their local multi-agency safeguarding arrangements.

The governors for safeguarding are trained DSLs.

8. 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 the teaching and medical 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, including all non-teaching staff, have an important role in insisting that pupils always adhere 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 electronic equipment 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 will also be 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 14 '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), HM/Houseparents, 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 designated 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 helpline enabling them to call for support in private.
- Prep School pupils in Year 3 to 6 have a planner which contains guidance on where to turn for advice, including confidential helplines and web addresses for external specialists such as ChildLine, Kidscape, Get Connected and the Samaritans.
- 'Who can I talk to' posters are displayed around the School.
- Our Medical Centre and all our boarding houses 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 and their team of prefects, as well

as all Year 12 pupils as they take up the role of house prefects, which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils. Our prefect system is 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 specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- 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;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- 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;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

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.

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

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
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to.

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 School's Felsted Connect and the Felsted internal homepage), via the School's safeguarding platform) or by telephone or emailing the DSL via the contact details in this policy and on all staff ID badges.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This must not prevent staff from speaking to the DSL if they have concerns about a child.

Generally, 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 its data protection obligations when sharing such data. Whilst the School aims to get consent to share information, relevant personal information may be shared without consent if there is a lawful basis to do so such as where a child's safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The School operates its processes with the best interests of the pupil at their heart.

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 consider

speaking to a member of the senior leadership team and/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 threshold document published by Essex ESCB. 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 that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

Staff should not assume 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. The School's local authority is Essex which operates the Essex Safeguarding Children Board (ESCB).

What staff should do if a child is suffering, or is likely to suffer from 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.

Anyone can make a referral. Initial advice can also be obtained from the Children and Families Hub or Initial Response Team (details below). Parental consent is not needed for referrals 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 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 a child goes missing from education

Children who go missing from education, particularly on repeat occasions, is a potential indicator of a range of safeguarding possibilities. The School's procedures for unauthorised absence and for dealing with children who go missing from education are referred to in sections 15 and 16 of this policy.

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. Teaching staff have a separate duty to report to the Police: from October 2015, all teachers have a statutory duty 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.

If staff have concerns that FGM has taken place, as well as reporting this to the police they should also activate local safeguarding procedures using existing national and local protocols. 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 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), 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.

10. CHILD-ON-CHILD ABUSE

Arrangements for dealing with Child-on-Child Abuse

Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and 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
- 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 violence and sexual harassment between children
- Causing someone to engage in sexual activity without consent,
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- 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)

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 peer on peer 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 and the Management Information System (MIS)
- Pastoral support system with tutors, HoPs / HMs, Wellbeing Centre and the DSLs / 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 (Senior) or Houseparents (Prep), in conjunction with the Senior Deputy Head (Senior) or Deputy Head (Prep) and the DSL. A full investigation will establish the facts.

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 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

The School's approach to sexting / youth produced sexual imagery is that it is totally unacceptable and in any case a full investigation will be carried out, parents informed and providing there has been no coercion and the pupils are of a similar age, school disciplinary procedure will be applied. In more serious cases, the police will be informed.

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 hears 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 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 peer on peer 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 peer on peer 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. Confidentiality will be an important consideration for the School and advice will be sought as necessary from Essex ESCB and/or the Police as appropriate.

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 working with children 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.

In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the School and support from external agencies will be sought, as appropriate. Victims will be reassured that they are being taken seriously and that they will be supported and kept safe. The School will do everything possible to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including the possible impact of social media.

Where a report concerns an allegation of sexual violence and/or sexual harassment, 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, including if the children may benefit from early help. 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.

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 or college, 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.

A written record of the report will always be made.

11. PROCEDURES FOR DEALING WITH CONCERNS/ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER 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.

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.

Local Authority (ESCB SET procedures,) require that, where an allegation against a member of staff is received, the Headteacher, 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 and HR. The School does not carry out any investigation before speaking to the LADO.

In borderline cases, the School will discuss informally with the 'designated officer' 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 HR Manager (unless the HR manager 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 local LADO.
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 designated officer 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. The individual would normally be informed as soon as possible and given an explanation of the likely course of action after the result of any initial investigation authorised or conducted by the designated officer is known and provided there is no objection by children's social care or the Police. The School will normally appoint a named representative to keep the person informed of the likely course of action and the progress of the case. The case manager will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
5. 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.
6. The case manager will discuss with the designated officer 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. The Trustees will also consider their serious incident reporting duties to the Charity Commission.
7. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer 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 record whether it is substantiated (sufficient evidence either to prove or disprove 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 unfounded (no evidence or proper basis which supports the allegation being made). If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records.

Allegations proven to be false, unsubstantiated or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil. 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.

If the LADO or any of the statutory child protection authorities decides to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and

justification for suspension will be recorded and the staff member informed of them. In the case of staff the matter will be dealt with in accordance with the Disciplinary Procedure. 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. In the case of a pupil the matter will be dealt with under the discipline and / or exclusions policy.

During the course of the investigation the School in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

Any pupils who are involved will receive appropriate care.

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

12. PROCEDURES FOR DEALING WITH CONCERNS ABOUT TEACHERS AND OTHER 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.

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; and/or
- relates to their conduct outside of work which, 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.

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 thresholds (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 the DSLs and HR Manager (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.

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

13. PREVENTING RADICALISATION

We recognise that it is a key role of the School to support children and that 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.

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. In some cases, 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 identification including a photograph such as a passport or photo card driving licence. The School shall also keep a register of visiting speakers retained in line with its Data Protection Policy.

14. 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 by attending online safety training.
- 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 filter 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 Designated Safeguarding Leads (DSLs) 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'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 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. Pupil profiles identify children with additional needs and where they may need support regarding awareness of appropriate relationships and online behaviour. 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 3G and 4G 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.

15. ABSENCE AND CHILDREN MISSING FROM EDUCATION

The School will monitor all pupil absences from school and promptly address 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.

In some circumstances, the School has a legal duty to report absences to the Local Authority. This would normally be if a child has missed 10 consecutive days of school without any credible reason to fulfil the child missing education part of KCSIE. The School recognises that a child going missing from education, particularly on repeat occasions, is a potential indicator of abuse, neglect or may be at risk of radicalisation, FGM or forced marriage. For further details, please see the Missing Child Crisis Management Plan/Procedure (Prep) and the Missing Pupil Policy (Senior).

The School reports all pupils joining and leaving the School to the local authority, Essex County Council.

16. ACTION IF A PUPIL IS MISSING

Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedure for dealing with children who go missing can be found in the Missing Child Crisis Management Plan/Procedure (Prep) and the Missing Pupil Policy (Senior). All unexplained absences will be followed up in accordance with these policies.

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.

17. 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.

18. PARENTS/GUARDIANS

In general, we believe that parents should be informed about any concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, parental consent is not required for referrals to statutory agencies. 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.

The School requests at least two emergency contact numbers for every pupil so that, where reasonably possible the School holds more than one emergency contact number for a pupil.

19. RECORDING, MONITORING AND EVALUATING

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

Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible, and within 5 days for an in-year transfer or within the first 5 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. For example, information that would allow the new school to continue supporting victims of abuse and have that 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

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 11 or section 12 of this policy and may result in action being taken under the School's disciplinary procedures.

Staff must report any concern about the behaviour of another member of staff to the Head (see section 11 and section 12 of this policy) to allow the School's safeguarding arrangements to be implemented and for the School to act accordingly.

This policy is not an exhaustive list of acceptable and unacceptable standards of behaviour. All staff are expected to demonstrate high standards of personal and professional conduct and consistently act with honesty and integrity and in the best interest of the School community at all times.

20. 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.

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.

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.

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. Individual members of staff cannot use or post or pass on such images of pupils outside the School without the relevant data sharing agreement in place.

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 Stewart House) prepsdl@felsted.org

Within Stewart House (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.

The School does not allow a member of staff to contact a pupil or parent/carer 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 phones hold the numbers of the boarders and their families.

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.

If a member of staff is unable to access a school device, the member of staff should seek permission from their line manager to take any images of pupils on their personal device. 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 or personal (in exceptional circumstances) device.

All staff

Staff are strictly prohibited from bringing any inappropriate or offensive material, such as indecent images and/or pornography, onto 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 or use their personal devices. If staff discover any material that is potentially illegal or inappropriate, they must immediately contact the DSL in accordance with this policy.

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.

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. It is advisable that staff do not have contact with past pupils (above school age). Staff may remain in communication with past pupils via a school email account or the School social media accounts. Please see the Online Safety and ICT Acceptable Policy and the Social Media Policy for staff obligations in relation to electronic communication with pupils.

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. 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.

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 DSL/Head who will decide what to do next.

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 11 of this policy, where an allegation of using excessive force is made against a teacher. Suspension will not be an automatic response; the School will always consider whether a teacher has acted within the law when reaching a decision on whether or not to take disciplinary action.

There may be times when a member of staff needs to search a pupil or a pupil's belongings because something has gone missing and there are reasonable grounds to conduct a search. In such circumstances staff must follow the guidelines set out in the School's Search Policy.

Physical education and other 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.

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.

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.

Transporting pupils

Staff should avoid taking one pupil in 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.

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. They will also take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.

21. STAFF DAILY CONDUCT REQUIREMENTS

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 Stewart House, the Prep School or the Senior School. All staff must follow the staff sickness absence from work procedure, available on Felsted Connect and from the HR department.

Smoking

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

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. At all times when a member of staff has responsibility for supervising pupils 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.

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 (whether through excessive consumption of alcohol, or inappropriate behaviour) can expect to be dealt with through the School's disciplinary procedures.

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 or Felsted Connect.

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.

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.

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.

22. EQUAL TREATMENT

We are committed to equal treatment for all pupils regardless of sex, race, disability, religion or belief, sexual orientation, gender reassignment or pregnancy or maternity.

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.

23. 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.

24. WHISTLEBLOWING (see section 11 and section 12 of this 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. Under the Public Interest Disclosure Act 1998 the member of staff may be entitled to raise a concern directly with an external body where the circumstances justify it.

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 12 of this policy, to allow the School's safeguarding arrangements to be implemented and for the School to act accordingly.

MONITORING

25. 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.

26. 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
- 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
- Regular review of parental concerns and parental questionnaires
- Regular 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>

Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Information Sharing

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

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

[*UK Council for Internet Safety -Sharing nudes and semi-nudes: how to respond to an incident*](#)

Online safety advice for pupils, parents and teachers

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

www.childnet.com/cyberbullying-guidance

Preventing radicalisation

educateagainsthate.com

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

Contextual safeguarding

<https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

Early Help - Essex Effective Support Windscreen

<https://www.essexeffectivesupport.org.uk/home/>

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

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

Types of abuse

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

Child Sexual Exploitation (CSE): CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. 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 child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. 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). The above 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 or become pregnant.

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 any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. 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, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people 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.

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 are exploited to move, store and sell drugs, weapons 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 also 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 indicators for CSE and CCE 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:

in areas away from their home; • have been the victim or 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.

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

So Called 'Honour-Based' Abuse (HBA): 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. It can include multiple perpetrators. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers to 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.

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. 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 on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.

Preventing Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is 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. 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 a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through different methods such as online. 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 at risk of radicalisation and act proportionately, which may include the DSL or DDSL making a referral to the Channel programme.

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, and this will be stressful for them. Making child arrangements following separation can also be stressful

and entrench conflict in families. Staff should be alert to the needs of such pupils and report any concerns to the DSL or DDSL in accordance with this policy.

Children with family members in prison: Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should be alert to the needs of such pupils and report any concerns to the DSL or DDSL in accordance with this policy.

Homelessness: Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. The DSL or DDSL will raise/progress any concerns about homelessness with the Local Housing Authority although this does not replace a referral into children's social care where a child has been harmed or is at risk of harm.

Domestic Abuse: Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

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.

Modern Slavery and the National Referral Mechanism: 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.

Cybercrime: 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 school's 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