



## Brentwood School

### Safeguarding Policy

<b>Document Owner:</b>	Senior Deputy Head and DSL		
<b>Relevant to:</b>	All pupils including those in the EYFS.		
<b>Regulatory Body:</b>	Department for Education, Independent Schools Inspectorate		
<b>Relevant Legislation/Guidance:</b>	<p>Independent Schools Standards Regulations  <a href="#"><i>Keeping Children Safe in Education (September 2023) (KCSIE) (DfE Statutory Guidance)</i></a>  <a href="#"><i>Working Together to Safeguard Children (July 2018) (WT) (updated July 2022) (DfE Statutory Guidance)</i></a>            Revised Prevent Duty Guidance for England and Wales <a href="#"><i>Revised Prevent Duty Guidance for England and Wales (updated April 2021) (DfE Statutory Guidance)</i></a>  <a href="#"><i>The Prevent duty: Departmental advice for schools and childminders (June 2015) (DfE Guidance)</i></a>  <a href="#"><i>The use of social media for online radicalisation (July 2015) (DfE Guidance)</i></a>  <a href="#"><i>Behaviour in Schools (DfE Guidance) (September 2022)</i></a>  <a href="#"><i>Preventing and Tackling Bullying (DfE Guidance) (July 2017)</i></a>  <a href="#"><i>Mental Health and Behaviour in Schools (November 2018) (DfE Advice)</i></a>  <a href="#"><i>What to do if you are worried a child is being abused: Advice for practitioners (March 2015) (DfE Advice)</i></a>  <a href="#"><i>Low level concerns protocol</i></a>  <a href="#"><i>Filtering and monitoring standards for schools and colleges (March 23) (DfE Guidance for schools)</i></a></p>		
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	Supervision policy		

## **SAFEGUARDING POLICY**

### **(INCLUDING STAFF CODE OF CONDUCT)**

*This policy is applicable to all pupils including those in the EYFS.*

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## STATEMENT OF INTENT

The safety and wellbeing of all our pupils at Brentwood School is our highest priority and safeguarding and promoting the welfare of children is everyone's responsibility. To know everyone as an individual, to provide a secure and caring environment, so that every pupil can learn in safety, is at the heart of our safeguarding system. The key issue for all staff is to listen to pupils, identify concerns, take prompt action and to share information with, and flag up any concerns regarding a child's wellbeing, their mental and physical health or safety to the appropriate person (including the relevant Local Safeguarding Children's Partnership, which include Essex Safeguarding Children Board and Southend, Thurrock, Barking and Dagenham, Havering and Redbridge Safeguarding Children's Partnerships, as required) as outlined in this policy. This ensures that matters of concern are suitably reviewed and appropriate actions taken. The School operates safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by safeguarding partners and this includes working with the relevant agency in cases where children go missing from education. At all times, the approach to safeguarding and child protection should be child-centred and the best interests of the child considered at all times when deciding the appropriate response. Staff members maintain an attitude of **"it could happen here"** where safeguarding is concerned.

Our Safeguarding and Safer Recruitment Policies and procedures refer to the following documents:

[Keeping Children Safe in Education \(September 2023\) \(KCSIE\) \(DfE Statutory Guidance\)](#)  
[Working Together to Safeguard Children \(July 2018\) \(WT\) \(updated July 2022\) \(DfE Statutory Guidance\)](#)  
Revised Prevent Duty Guidance for England and Wales [Revised Prevent Duty Guidance for England and Wales \(updated April 2021\) \(DfE Statutory Guidance\)](#)  
[The Prevent duty: Departmental advice for schools and childminders \(June 2015\) \(DfE Guidance\)](#)  
[The use of social media for online radicalisation \(July 2015\) \(DfE Guidance\)](#)  
[Mental Health and Behaviour in Schools \(November 2018\) \(DfE Advice\)](#)  
[What to do if you are worried a child is being abused: Advice for practitioners \(March 2015\) \(DfE Advice\)](#)  
[Low level concerns protocol](#)

*Definitions in this policy are taken from KCSIE (September 2023).*

The Safeguarding Policy is made available via the School website or on request from the School Office.

## **SAFEGUARDING AND THE PROMOTION OF WELFARE OF CHILDREN**

Brentwood School promotes a child centred and coordinated approach to safeguarding.

Safeguarding and promoting the welfare of children, as defined in KCSIE, as:

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

'Children' includes everyone under the age of 18 and, for the purposes of this policy, those in full-time education in the Sixth Form who are over 18.

## **EQUAL TREATMENT**

Brentwood School is committed to equal treatment for all regardless of sex, disability, special educational need (SEN), race, culture, linguistic background, religion or belief, sexual orientation, gender reassignment/identity, 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, whatever their individual needs, to support those in need of additional help and to listen sensitively to their wishes.

## **BULLYING**

Bullying, harassment, victimisation and discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration and we expect them to emulate this approach in their dealings with each other, all the staff and those in the wider community. Any kind of bullying is unacceptable. Our Anti-Bullying Policy sets out guidelines for pupils, teachers and parents and our Anti-Bullying Codes are displayed around the School. A bullying incident will be dealt with as a child protection concern when there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm.

## **SAFEGUARDING IN THE EVENT OF WHOLE OR PART-SITE CLOSURES**

In the event of whole- or part-site closures in response to a pandemic or local or national emergency, safeguarding remains our priority and we will follow the additional guidance in the policy addendum below:

[Safeguarding policy addendum](#)

## **THE ROLE OF THOSE WHO WORK AT THE SCHOOL**

All those working on the School site, in any capacity, who come into contact with children and their families have a responsibility to safeguard and promote the welfare of children and to provide help for children to prevent concerns from escalating. It is our responsibility to listen to concerns raised by children, be alert to possible signs of abuse and to identify early those who may be in need of extra help/early intervention or who are suffering, or are at risk of suffering significant harm. Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe.

For teachers, the Teachers' Standards (effective 2012) state that teachers (which includes Headteachers) 'uphold public trust in the profession', having regard for the need to safeguard pupils' wellbeing, in accordance with statutory provisions' as part of their professional duties.

All staff should reflect on the effectiveness of their own safeguarding practice and seek the advice of the DSL or Deputy DSL if they have any questions about what they need to do to safeguard a child or young person.

### **Identifying safeguarding factors**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines (county lines is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets - suburban areas and market and coastal towns - using dedicated mobile phone lines or "deal lines" (NSPCC)).

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

All staff should be aware that children with special educational needs and/or disabilities may be particularly vulnerable to abuse, including child-on-child abuse. They should also be aware that there may be additional barriers for children with SEND to report abuse and that additional barriers can exist when recognising abuse and neglect in children with SEND. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further explanation;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

### **Acting on concerns**

Where a member of staff has **any concerns about a child**, even if they are unsure, they should act on this immediately and speak to the Designated Safeguarding Lead (DSL) or Deputy DSL for any necessary action to be taken; this may result in pastoral support in school or a referral to a specialist service or early help services. If the DSL or Deputy DSLs are unavailable, this should not delay appropriate action being taken and staff should consider speaking to a member of the Senior Leadership Team and/or take advice from Children's Social Care. If anyone other than the DSL makes the referral to Children's Social Care, they should inform the DSL (or a Deputy DSL) as soon as possible.

If a child is in immediate danger, or is at risk of harm, a referral should be made to children's social care and/or the police **immediately**. Where a child is at risk, a referral may be made by the DSL to children's social care/the police if a crime has been committed, or directly by the member of the School staff. Such a referral does not require pupil or parental consent. This is also the case when there are concerns relating to radicalisation when there are reasonable grounds to believe that a child is at risk of significant harm.

A referral to Children's Social Care should consider where children are being harmed in contexts outside the home so the School will provide as much information as possible to enable a contextual approach to be taken to address any harm. Please refer to "Contextual Safeguarding" for further information.

The School follows the local criteria for action and the local protocol for assessments, working with the relevant Local Safeguarding Children's Partnership. For detailed information see the Local Safeguarding Children's Partnership Procedures, including: SET procedures (Southend, Essex and Thurrock) and London Child Protection Procedures followed by the BHR (Barking and Dagenham, Havering and Redbridge) Safeguarding Partnership.

Please also refer to Part One and Annex B of KCSIE (September 2023) and the Essex Safeguarding Children Board (Local Safeguarding Children's Partnership) guidance, 'Report a concern about a child - Essex,' which details thresholds for intervention.

A **child in need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. If a child is determined as being in need, an assessment will be made under section 17 of the Children Act 1989. (KCSIE, September 2023).

Where children are suffering or likely to suffer significant harm, local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering or likely to suffer significant harm. This will enable the local authority children's social care to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect. (KCSIE, September 2023).

## **IN-SCHOOL PROVISION FOR LISTENING TO CHILDREN AND FOR EARLY HELP**

There is an extended pastoral team across the School to support every child in School and to provide early help as appropriate for children in need. This team is led by the Deputy Head (Pastoral and DSL) in the Senior School, the Deputy Head (Pastoral and DSL) in the Prep School, and includes the Director of Pastoral Care and Safeguarding, Prep Director of

Pastoral Care and Wellbeing, School Chaplain, the Director of Pupil Wellbeing and Senior Mental Health Lead, the Heads of Year and their deputies, the Learning Support (SEND) departments, the School nurses, the boarding house team, pastoral mentors for, Years 7-11 and the Sixth Form, House staff and School Counsellors. There are regular Pastoral Team meetings to coordinate the in-school support in addition to safeguarding team meetings and regular, individual meetings between the Deputy Heads (Pastoral), Director of Pastoral Care and Safeguarding, and members of their pastoral teams. There is also a peer mentoring programme for pupils in the Senior School.

This in-school provision may be in addition to early help and support for children and families by the local safeguarding children partnerships and/or other external agencies and professionals, including external counselling and mental health support.

## **WHAT TO LOOK OUT FOR**

### **Early help**

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

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

## **THE ROLE OF PUPILS AT THE SCHOOL**

Brentwood School prides itself on its core values of 'Virtue, Learning and Manners' and we expect kindness, courtesy and respect to be shown by all members of the School community so that every pupil can develop their full potential and feel positive about themselves as an individual. All pupils should feel confident that they know who to turn to if they are experiencing difficulties or are aware of others who may be in distress. 'Who can I talk to?' posters are displayed in Form Rooms and the Boarding Houses and all pupils in the Senior School have a card in their ID/Tuck Shop badges with a reminder of whom they can approach as well as key contacts to outside support agencies, such as CEOP (online protection for children), the NSPCC and ChildLine.



## **THE ROLE OF PARENTS**

We work very closely with parents and guardians as we recognise that we have a shared responsibility to safeguard every child at Brentwood School. There are clear channels of communication for parents to discuss any concerns they may have about their child's wellbeing to ensure that support is provided as far as possible at the earliest possible stage. Copies of this important policy, together with our other pastoral policies, are on our website and parents and guardians should always feel able to take up any issues or worries that they may have with the Form Tutor or Class Teacher as the first port of call.

## **THE ROLE OF THE HEADMASTER**

The Headmaster should ensure that the policies and procedures, adopted by the Governing Body, (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

## **THE ROLE OF GOVERNORS**

It is the responsibility of the Governing Body to ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Where there is a safeguarding concern, the Governing Body and Senior Leadership team should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

A Governor, Professor Bruce Evans, has been nominated with special responsibility for safeguarding. He is a Governor with experience and training in this role and he monitors child protection at the School principally through liaising with the Designated Safeguarding Leads.

All Governors have been trained in safeguarding matters by the Headmaster and/or DSL and the Governors formally consider child protection issues once a year with day-to-day issues being delegated to its Executive Committee, which the Headmaster, Deputy Head (Pastoral) and the Head of the Preparatory School attend.

The Governing Body is responsible for:

- reviewing the procedures for and the efficiency with which the child protection duties have been discharged;
- approving amendments to child protection arrangements in the light of changing Regulations or recommended best practice;
- ensuring that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The training should be regularly updated. Induction and training should be in line with any advice from the Essex Safeguarding Children Board;
- ensuring that children are taught about safeguarding, including online safety, and recognising that a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed;



- regularly reviewing the effectiveness of school filters and monitoring systems in place to help protect children online and ensuring that the leadership team and relevant staff are aware of and understand the systems in place, manage them effectively and know how to escalate concerns when identified;
- ensuring that any deficiencies or weaknesses in child protection arrangements are remedied.

## WHAT IS CHILD ABUSE?

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with each other.

**Abuse:** 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. 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.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child 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:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the School's procedures for dealing with it (see the section on child-on-child abuse below).

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

### **Specific safeguarding issues**

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and online behaviour such as the consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, can be signs that children are at risk.

Other safeguarding issues all staff should be aware of include:

### **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 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 Criminal Exploitation (CCE)**

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

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

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

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to

look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

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

Mrs Jenny Edwards (Pastoral Manager, Senior School) acts as the School's Child Exploitation (CE) Champion in the Senior School and Mrs Susannah Trowell (Deputy Head, Pastoral) fulfils this role in the Prep School.

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but 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.

### **Operation Encompass**

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children where there is domestic abuse. Staff should speak to a member of the safeguarding team if they think a child may benefit from such support.

See KCSIE, Annex B, September 2023 for further information and support organisations.

### **So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL (or a deputy). As appropriate, the DSL (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

### **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 or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning difficulties, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

As with other safeguarding and child protection concerns, staff should alert the DSL to concerns about a pupil being forced into marriage or possible honour-based abuse. 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](mailto:fm@fco.gov.uk).

See also: 'The Right to Choose: Multi-agency statutory guidance for dealing with forced marriages.'

### **Female genital mutilation (FGM)**

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. See Annex B of KCSIE (September 2023) for further details.

Information when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#) (Updated January 2020).

### **Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences, and their high prevalence of special educational needs and mental health needs, can impact on their behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken to ensure the safety of the child, and the Designated Safeguarding Lead, Deputy DSL or Senior Mental Health Lead informed straight away.

The following documents contain further information:

[Mental Health and Behaviour in Schools](#) (November 2018), (DfE Advice)

[Public Health England resources](#) to support secondary school teachers to promote positive health, wellbeing and resilience among children.

### **Child-on-child abuse**

All child-on-child abuse is unacceptable and will be taken seriously.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online.

All staff should understand that even if there are no reports in the school, it does not mean that it is not happening; it may be the case that it is just not being reported.

In order to minimise the risk of child-on-child abuse, all staff should be alert to the fact that children may abuse other children, child-on-child abuse may not be reported. All staff should be aware of the School's procedures for dealing with child-on-child abuse as per this policy and should recognise the importance of challenging inappropriate behaviours between peers and take action if they encounter any such abuse, because downplaying certain behaviours, for example dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up' or 'boys being boys' can lead to a culture of unacceptable behaviours, it can create an unsafe environment for children and can lead to a culture that normalises abuse.

Child-on-child abuse is most likely to include, but is not limited to:

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

Child-on-child abuse may be gendered in nature but whatever the context, it will be taken seriously.

Where there is abuse by one or more pupils, whether day or boarding, against another pupil and there is cause to suspect a child is suffering, or likely to suffer, significant harm, this will be referred to Children's Social Care and the police as appropriate. Following such a disclosure, all children involved will be treated as being "at risk". It may be appropriate for a boarder to go home to a parent or guardian, rather than remain in the Boarding House, depending on the risk or potential risk to that pupil. Victims will be given support by the Pastoral Team, with the support of external professionals, such as CARA (the Centre for Action on Rape and Abuse in Essex), as appropriate. Issues of pupil behaviour or bullying will be dealt with under the safeguarding policy where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.

### **Child-on-child abuse - Sexual violence and sexual harassment between children**

As stated in KCSIE (Part 5), 'Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.' Such abuse may take place between children within a family. Staff are advised to maintain an attitude of 'it could happen here' and all staff should report any concerns about sexual violence and sexual harassment between children, whether this has occurred in or out of school. Following an incident, any necessary support will be put in place for siblings.

As a School we encourage pupils to report any form of abuse or concern about their wellbeing or that of a peer, including sexual violence and sexual harassment, whilst recognising that young people may be reluctant to make a report, for example through embarrassment or worry about getting into trouble. As we are aware that pupils may not come forward and make a disclosure, it is all the more important to be on the alert for any indicators of abuse and to take any necessary action early and report concerns, no matter how small, to the DSL or a Deputy DSL.

In responding to a report of sexual violence or sexual harassment between children we follow the guidance in:

- [KCSIE, Part 5](#) (September 2023); and
- ['When to call the police - guidance for schools and colleges'](#) (NPCC).

As part of the Wellbeing and RSE programme, pupils learn about respect, positive relationships and friendships, personal safety and consent. There are 'Who can I talk to?' posters around the School and support via tutors, peer mentors, Heads and Deputy Heads of Year, the Director of Wellbeing and Mental Health Lead, the SENDCos, the Pastoral Managers/Mentors, the School Chaplain, House staff, the School Counsellor, the Director of Pastoral Care and Safeguarding, and members of the Safeguarding team. Additionally, there is 'The Big Conversation' series of events which complement the Wellbeing Programme and enable staff and pupils to discuss sensitive issues with the aim of challenging inequality, prejudice and discrimination; the inaugural event focused on sexism.

### **Child-on-child abuse - Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)**

We follow the advice about how to deal with incidents involving the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online in the Government UK Council for Internet Safety (UKCIS) document: [Sharing nudes and semi-nudes: Advice for education settings working with children and young people](#) (December 2020) in conjunction with:

- [Keeping Children Safe in Education \(September 2023\) \(KCSIE\)](#) (DfE Statutory Guidance);
- [Searching, screening and confiscation](#): non-statutory advice (DfE);
- [When to call the police - guidance for schools and colleges](#) (NPCC).

In cases of child-on-child abuse where there is no cause to suspect that a child is suffering, or likely to suffer significant harm, victims, perpetrators and any other child affected will be supported, working with parents, by the School's pastoral care teams and/or external agencies as appropriate.



As a school we do not tolerate abuse of any kind and do not tolerate or pass off abuse as mere “banter” or “having a laugh” and it is important that all staff challenge abusive behaviours between peers and should flag cases of child-on-child abuse to the DSL/Deputy DSL, whether the abuse has taken place inside or outside school or online. We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. As well as being alert to possible child-on-child abuse when in the classroom or on duty round the site, all staff play an important part in preventing it and should intervene whenever they come across such abuse both in school or when they see pupils coming to and from school, when taking children off site on trips and visits. All staff must enforce the School’s mobile phone policy, the [iPad Student Acceptable User Agreement](#) and the [Whole School Network Acceptable Use policy](#).

In addition to a staff presence around the School and a strong pastoral support network, there is a team of peer mentors to ensure there is a supportive environment where victims feel confident in reporting incidents. Anyone making a report will be taken seriously, supported and not made to feel that they are creating a problem or feel ashamed because of what they have reported.

Pupils are taught about safeguarding and how to report concerns they may have about their own safety and wellbeing or that of a friend through the Wellbeing (PSHE) programme (which includes RSE), in tutor time or in assemblies. There are also posters around the School to identify members of the pastoral team and opportunities for one to one chats with their form teacher or other member of staff they feel comfortable talking to.

Allegations of child-on-child abuse will be acted upon and recorded following this policy and/or the School’s Behaviour Management policy (which follows the DfE guidance, ‘[Behaviour in Schools](#)’) as appropriate. Staff should be aware that victims may not make a direct report - a child’s behaviour may change, children may show signs or act in ways that they hope adults will notice and react to, a friend may make a report or a member of staff may overhear a conversation. Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, child-on-child abuse will be treated as a safeguarding matter under this policy and will be referred to Children’s Social Care and/or police. The Deputy Heads (Pastoral) in the Prep and Senior School ensure that safeguarding records are kept securely and also maintain a record of serious disciplinary issues, bullying incidents (including cyberbullying) and incidents involving child-on-child sexual harassment and sexual violence.

### **Serious violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Additional advice can be found in KSCIE, Annex B, and in the Home Office’s guidance: [Preventing youth violence and gang involvement](#)



## Criminal exploitation of children and vulnerable adults: county lines

### **Preventing radicalisation**

As outlined in KCSIE (Annex B) (September 2023), “radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.” Extremism is defined as “the vocal or active opposition to fundamental British values, including the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.”

There is no single way of identifying an individual who 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 may occur through many methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. 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. School staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or Deputy DSL) making a Prevent referral.

Link to: “Revised Prevent Duty Guidance: for England and Wales” (updated April 2021), “Prevent Duty: Departmental Advice for Schools and Childminders” (June 2015). And “The Use of Social Media for Online Radicalisation” (July 2015).

‘Educate Against Hate’ is a useful website for teachers, parents and school leaders, which provides information and access to resources.

### **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. (KCSIE, September 2021, Annex B)

Statutory guidance on Channel is available at: [Channel guidance](#)

Although decisions to seek support for a child in need, or about whom there are radicalisation concerns, are normally taken in consultation with parents and pupils, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

In order to build resilience in children who may be at risk of radicalisation, the School’s values based on “Virtue, Learning and Manners” are actively promoted, as are fundamental British values through assemblies, in chapel, in the curriculum and the Wellbeing (PSHE) programme and in co-curricular activities.

We filter our web content using category filtering and page scanning which is provided by Smoothwall. Further protection is provided by Palo Alto Networks via their next-generation firewall. We automatically block sites which fall into “Extremism, Gambling and Pornography” for all pupils. “Gaming” is also blocked during the school day but permissions are relaxed for our Boarders during the evenings and weekends, and at specific times for an eSports Club. Similarly, access to Social Media applications such as Facebook, Snapchat etc. are blocked for all pupils during the school day but permissions are relaxed for our Boarders during the

evenings and weekends. Google's Safe Search feature is enabled for every user, and YouTube's Safe Search is enabled by default for pupils. In addition to this, all school-owned devices are filtered both on, and off, the school site. The School has clear protocols, as outlined below, for ensuring that any visiting speakers, whether invited by staff or pupils, are suitable and appropriately supervised.

### **Hosting Speakers on School Premises**

The School values, "Virtue, Learning and Manners" permeates all we do in the whole school community. We actively promote the spiritual, moral, social and cultural development of pupils whilst upholding the fundamental British values of Democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. As an IB World School, we encourage pupils to reflect on such issues in a global context.

Through hosting external speakers at Brentwood, we provide a safe environment for pupils to look critically at the world around them, to engage with a variety of issues and hear and debate different perspectives.

We have regard to Keeping Children Safe in Education (September 2023), including the Prevent duty and the DfE guidance document, "Promoting fundamental British values as part of SMCS in schools" (November 2014).

#### **Protocol for hosting visiting speakers:**

Staff must ensure that any visiting speakers, whether invited by staff or the pupils themselves, are suitable and appropriately supervised.

When inviting a speaker, they should check the credentials of the speaker. This may be via an Internet search, personal recommendation or booking through an established agency. These checks need then to be communicated to a line manager.

In cases where a speaker is invited by pupils, a member of staff must oversee the checks above.

Our normal safeguarding procedures apply for visitors to the site: visitors are met at reception, sign in, are issued with a visitor's badge to be displayed at all times and are accompanied to and from reception and at all times during their visit.

Staff need to be aware that schools are required to forbid political indoctrination and ensure a balanced treatment of political issues. This extends to co-curricular activities provided or organised for pupils at the School or on behalf of the School.

Staff organising the event should be aware beforehand of the likely content of a presentation given by a visiting speaker. The member of staff in charge of supervising the visiting speaker must be prepared to intervene if he/she judges the content of the presentation/discussion unsuitable for the audience (i.e. safeguarding issues, including a danger of promoting extremist views and undermining fundamental British values).

If material is distributed to pupils by a visiting speaker, including links to helplines etc., the staff member hosting and supervising the visitor must be confident that this information or link to the speaker will not put a pupil at risk of harm.

Advice should be sought from a member of the SLT if there is **any** doubt as to the suitability of a speaker.

### **Absent pupils/children missing from education**

All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

As a school, we recognise that early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Attendance registers are taken twice a day and year teams monitor pupil attendance. All teachers should alert the relevant tutor if there is a concern about a pupil's attendance in lessons or activities so that this can be followed up. If the reason given for absence causes concern or there is repeated absence, the tutor should alert the Head of Year who will work with the DSL or Deputy DSL where there is a possible safeguarding issue.

Where reasonably possible, the School holds more than one emergency contact number for each pupil.

The School will notify the local authority when a child or pupil fails to attend school regularly or is absent without leave for more than 10 school days (continuous). The School will then work with the local authority to make reasonable enquiries as to the pupil's whereabouts.

The School must also notify Essex local authority when they remove or add a pupil's name to the admission register at non-standard transitions. Reasons for removal from roll may include the following:

#### The pupil

- has been taken out of school to be home educated;
- has ceased to attend school as the family has apparently moved away;
- has been certified as medically unfit to attend;
- is in custody for a period of more than four months; or,
- has been permanently excluded.

We work closely, too, with the relevant local authority in cases in which children are missing education through long-term illness or who leave Brentwood to be home educated.

For further information see the DfE [Working Together to Improve School Attendance Guidance](#) (September 2022) and the statutory guidance [Children Missing Education: Statutory guidance for local authorities](#). (September 2016)

The School has procedures for identifying and following up children missing from School. Missing Children procedures for each section of the School set out the steps required where a child goes missing during the School day or at any time from Boarding.

The School records where children are moving onto when they leave Brentwood and the start-dates at their new schools. Pupil information, including pupil academic reports, SEND and safeguarding concerns, is transferred to the new school. The School also requests this information from a pupil's former school, including details of any safeguarding concerns.

Details of further specific safeguarding issues including:

- child abduction and community safety incidents;
- children and the court system;
- children with family members in prison;
- county lines and/or gangs;
- modern slavery and the National Referral Mechanism;
- cybercrime;
- homelessness; and
- upskirting

can be found in KCSIE, Annex B (September 2023).

### **SIGNS AND BEHAVIOURS WHICH MAY INDICATE THAT A CHILD IS BEING ABUSED**

It is part of our duty of care to be alert to signs of abuse, which include, but are not limited to the following examples:

- A child says he or she has been abused or asks a question which suggests that this might be the case;
- A child displays signs of non-accidental injury or not receiving appropriate medical attention after injuries;
- Changes in personality and behaviour. This may include a child withdrawing from friendship groups, appearing wary or anxious or displaying challenging behaviour which is out of character. There may be changes in attendance patterns;
- Outbursts of anger;
- Changes in eating habits;
- Showing an inexplicable fear of particular places or making excuses to avoid particular people. Indications could include a child asking to drop a subject or change teachers but not being willing to give a reason;
- Self-harming (includes head banging, scratching, cutting);
- Knowledge of "adult issues" e.g. alcohol, drugs, sexual behaviour.

### **SIGNS AND BEHAVIOURS WHICH MAY INDICATE THAT A YOUNGER CHILD, INCLUDING A CHILD IN THE EARLY YEARS FOUNDATION STAGE IS BEING ABUSED**

- Significant changes in a child's behaviour;
- Deterioration in a child's general wellbeing;
- Unexplained bruising, marks or signs of possible abuse or neglect;
- Children's comments which give cause for concern;
- Any reasons to suspect neglect or abuse outside the setting, for example in the child's home;
- Inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example: inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

These signs are not evidence themselves, but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

All staff should be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could

be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication. (KCSIE, Part 1, Sep 23)

There is further information available on the NSPCC website: <http://www.nspcc.org.uk/> and in the DfE guidance document, "What to do if you're worried a child is being abused: advice for practitioners." (March 2015).

## **SAFER EMPLOYMENT PRACTICES**

Brentwood School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. The Recruitment, Selection and Disclosures Policy and the Recruitment of Volunteers Policy are made available to prospective staff on the School website and to all members of School staff on the Intranet. The School's recruitment procedures have due regard to the Prevent duty.

The School ensures that sufficient relevant staff are trained in safer recruitment processes.

All new appointments, including Governors, for whom checks are required, are recorded in the Single Central Register of Appointments. Details of all new starters are presented to each meeting of the Governors' Executive Committee and to the Full Governing Body. This demonstrates that all required checks have been completed before a person may start working on the School site.

All staff in our School are required to notify the School immediately if there are any reasons why they should not be working with children.

## **MANAGEMENT OF SAFEGUARDING**

There are three Designated Safeguarding Leads for Child Protection (DSLs) in the School:

- Mrs Nicola Jenkin, Senior Deputy Head, Pastoral (Senior School)  
Tel: 01277 243275
- Mrs Susannah Trowell, Deputy Head, Pastoral (Prep School)  
Tel: 01277 243398
- Mrs Roz Townsend - Director of EYFS (DSL responsible for the EYFS)  
Tel: 01277 243607

### **Deputy Designated Safeguarding Leads:**

- Miss Rachel Bishop (Director of Pastoral Care and Safeguarding, Senior School)  
Tel: 01277 243305
- Mrs Suzanne Bond (Pastoral Mentor, Senior School, and Deputy Head of Year 7, transition)  
Tel: 01277 243281
- Mrs Michelle Carabache (Director of Pupil Wellbeing and Senior Mental Health Lead)  
Tel: 01277243207
- Mrs Estelle Chippett (Pastoral Mentor, Sixth Form)  
Tel: 01277 243316

- Mrs Jenny Edwards (Pastoral Manager, Senior School)  
Tel: 01277 243233
- Mrs Jag Khush (Head of Year, Senior School)  
Tel: 01277 243215
- Mrs Melanie Knight (Director of Pastoral Care and Wellbeing, Prep School)  
Tel: 01277 243627
- Mr Timothy Sawyer (Deputy Head, Operations and Co-Curricular, Prep School)  
Tel: 01277 243331
- Mr Sarb Singh (Head of ITSS)  
Tel: 01277 243312

The Prep and Senior School DSLs are members of the Schools' Senior Leadership Teams. They take lead responsibility for safeguarding and child protection. They have been fully trained for the demands of this role in child protection and inter-agency working. They regularly attend courses with other child support agencies to ensure that they remain conversant with best practice. They undergo refresher training every two years which includes the Local Safeguarding Children's Partnership's approach to Prevent duties. They maintain close links with the Essex Safeguarding Children Board (Safeguarding Partnership) and report at least once a year to the Governing Body on the child protection issues outlined above. The School has regard to the Inter-Agency guidance, Working Together to Safeguard Children (2018). The Deputy Designated Safeguarding Leads are trained to the same standard as the DSLs.

The School's records on child protection are kept locked in the respective DSL's office and are separated from routine pupil records. Access is restricted to the DSLs and the Headmaster. The secure, on-line system, CPOMS, is used to record concerns and actions taken.

### **Whistleblowing**

On a day to day basis, the Headmaster and the Head of the Prep School and their respective Deputy Heads (Pastoral) are responsible for ensuring that any deficiencies or weaknesses in Child Protection are remedied without delay and drawing any serious concerns to the attention of the Governor with oversight of Child Protection. Should any member of the School community have concerns about unsafe practice or potential failures in the School's safeguarding procedures, these should be raised with the Headmaster, a DSL, or in cases where a staff member feels unable to raise them with the Headmaster or a DSL, with the Chairman of Governors. The School's Whistleblowing policy is set out in the Employee Handbook. There is an NSPCC whistleblowing advice line for staff (see contact number at the end of the policy).

At Brentwood School we have a culture of safety and raising concerns where staff are valued and feel able to raise concerns, challenge inaction and feel supported in their safeguarding role. Class teachers and form tutors receive training in their role and have clear channels for reporting any concerns.

### **THE RESPONSIBILITIES OF THE DSL (KCSIE, Annex C, September 2023)**

The Designated Safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

### **Manage referrals**

- To refer promptly all cases of suspected abuse and neglect to the Local Authority children's social care;



- To refer cases to the Channel programme where there is a radicalisation concern as required and to support staff who make referrals to the Channel programme;
- To refer to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA) cases where a member of staff has been dismissed or left due to risk or harm to a child;
- To refer cases where a crime may have been committed to the Police as required, following the NPCC guidance, 'When to call the police'.

#### **Working with others**

- To act as a source of support, advice and expertise for all staff;
- To act as a point of contact with the safeguarding partners;
- To liaise with the Headmaster to inform him of safeguarding and child protection concerns especially ongoing enquiries under section 47 of the Children Act 1989 and any police investigations. In the case of police investigations, the DSL should be aware that, under the Police and Criminal Evidence Act (1984), Code of Practice for the detention, treatment and questioning of persons by Police Officers (Statutory Guidance, PACE Code C 2019), children should have an Appropriate Adult;
- As required, to liaise with the "case manager" (either the Headmaster or, where the Headmaster is the subject of an allegation, the Chairman of Governors) and the local authority designated officer(s) for child protection (LADOs) concerns in cases which concern a staff member;
- To liaise with staff (especially pastoral support staff, School nurses, IT technicians, SENDCos and Senior Mental Health Lead) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- To liaise with the Senior Mental Health Lead and School nurses, counsellors and other health care professionals as appropriate, where safeguarding concerns are linked to mental health;
- To promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- To work with the Headmaster and Deputy Head (Academic), taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes:
  - To ensure that the School knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
  - To support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

#### **Information sharing and managing the child protection file**

- The DSL is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely, with concerns and referrals kept in a separate child protection file for each child. The secure, online system, CPOMS, is used to record safeguarding and child protection concerns and actions taken. Records should include:
  - A clear and comprehensive summary of the concern;
  - A note of any action taken, decisions reached and the outcome.



The DSL should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE (September 2023).

When children leave the School (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or college 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. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. When a child protection file is received from another school or college, key staff such as the DSL, Deputy DSLs and SENDCo should be aware of this information as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

#### **Raising awareness**

- To ensure each member of staff has access to, and understands, the School's Safeguarding Policy and procedures, especially new and part time staff;
- To ensure the School's Safeguarding Policy is reviewed at least annually and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this;
- To ensure that the Safeguarding Policy is available publicly (the policy is published on the School's website) and that parents are aware of the fact that referrals about suspected abuse or neglect may be made and the School's role in this;
- To link with the Local Safeguarding Children's Partnership (Essex Safeguarding Children Board) arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,
- To help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and School leadership staff.

#### **Training, knowledge and skills**

The DSL (and deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL should undertake Prevent awareness training. Training should provide DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk and the processes, procedures of other agencies, particularly children's social care to enable them to do the following:

- To understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care arrangements;
- To have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend (or be represented by a Deputy Safeguarding Lead) and contribute effectively to these when required to do so;
- To understand the importance of the role the DSL has in providing information and support to children's social care in order to safeguard and promote the welfare of children;

- To understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- To be alert to the specific needs of children in need, those with special educational needs (SEND) and young carers;
- To understand the importance of information sharing, both within the School, and with the safeguarding partners, other agencies, organisations and practitioners;
- To understand and support the School with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from risk of radicalisation;
- To be able to understand the unique risks associated with online safety and be confident they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;
- To be able to recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and to be confident that they have the capability to support children with SEND to stay safe online;
- To obtain access to resources and attend any relevant or refresher training courses; and,
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

In addition to formal training, the DSL's knowledge should be refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

#### **Providing support to staff**

Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters, specifically:

- To ensure that staff are supporting during the referral processes; and
- To support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

#### **Understanding the views of children**

DSLs should be supported in developing knowledge and skills to do the following:

- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them: and,
- To understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

#### **Holding and sharing information**

The DSL should be equipped to do the following:

- To understand the importance of information sharing, both within the School, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- To understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- To be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

#### **Availability**

The DSL or a Deputy DSL should always be available during school hours for staff to discuss any safeguarding concerns. Outside of term, one of the DSLs or Deputy DSLs will be contactable by staff, although this may not be in person.

## **INDUCTION AND CHILD PROTECTION TRAINING**

Every new member of staff, including part-timers, temporary, visiting and contract staff working in school, receives appropriate training on their responsibilities in being alert to the signs of abuse and bullying and on the procedures for recording and referring any concerns to the DSL or the Headmaster. Child protection training is also given to new Governors and volunteers. All members of the School community, including the Headmaster, attend refresher training as required in consultation with the Local Safeguarding Children's Partnership. Induction training for new teaching staff includes online safety (including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and the School's Behaviour Management policy and new staff are given a copy of this Safeguarding Policy (which includes the Staff Code of Conduct and the safeguarding response to children who go missing from education and child-on-child abuse) and KCSIE (Part 1) and Annex B. Staff who do not work directly with children receive a copy of KCSIE, Annex A, in addition to the Safeguarding Policy.

Training in child protection is an important part of the induction process and this includes ensuring that all new starters, including temporary staff and volunteers have read, understood and are familiar with this Safeguarding Policy (including the identity of the DSLs), Part One and Annex A of KCSIE (or Annex B if they do not work directly with children) and the Staff Code of Conduct and are aware of the School's whistleblowing procedures. "Prevent" awareness training forms part of the child protection training. Staff training also includes the role of staff in the early help process and how to identify children and young people at risk, online safety (which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), how to manage a report of child-on-child sexual violence and sexual harassment, how to respond if a child tells them he/she is being abused, exploited or neglected and the importance of reassuring victims that they are being taken seriously.

## **TRAINING**

- The Designated Safeguarding Leads and deputies receive updated child protection training at least every two years, including training in inter-agency working and informal updates;
- All staff, including those within the Early Years Foundation Stage, are trained in safeguarding and child protection (including online safety and Prevent awareness) and receive regular updates as required and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively. All staff have read Part 1 and Annex B of KCSIE (September 2023) (or Annex B of KCSIE if they do not work directly with children) and confirm that they have done this. New versions of KCSIE will be circulated to all staff as and when they are published.

## **INTERACTION WITH PUPILS: STAFF CODE OF CONDUCT AND ONE TO ONE SITUATIONS**

The Staff Code of Conduct provides clear guidance about behaviour and actions so as not to place pupils or staff at risk of harm or of allegations of harm to a pupil.

Staff working in **one to one situations** should ensure that wherever possible there is visual access and/or an open door. They should always report any situation where a child becomes distressed or angry. Arranging to meet with pupils away from the School is not permitted

unless the necessity for this is clear and approval is obtained from a senior member of staff, the pupil and their parents.

### **Use of blackout blinds**

Even if not in a one to one situation, staff should not fully blackout windows and doors but should make sure that there is still visual access when working with pupils, for example in a lesson or co-curricular activity, unless in a lockdown situation.

A copy of the Staff Code of Conduct is included in the School's Employee Handbook and is attached to this policy. Discussion of the procedures set out in that document forms a vital part of our induction procedures and includes guidance concerning the procedures when faced with handling any issue relating to child protection.

Our DSLs or the Headmaster should always be informed if a member of staff has any concerns.

The Code of Conduct is reviewed as part of the review of the Safeguarding Policy.

## **RESPECT AND PRIVACY**

Pupils are entitled to respect and privacy and especially when changing, toileting and showering. However, staff must ensure there is an appropriate level of supervision in changing rooms in order to safeguard children, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils and sensitive to the potential for embarrassment.

In the EYFS, staff must follow the School's Intimate and Personal Care procedures. A signed record should be kept of all intimate and personal care tasks undertaken.

If a pupil goes to the Sanatorium or to Matron with a concern that requires examination of an intimate part of their body and they are deemed to be at risk of immediate harm then the Nurse/Matron will arrange an appropriate chaperone.

## **RAISING AWARENESS WITH PUPILS**

Brentwood School prides itself on its culture of open and effective communication between staff and pupils and on its excellent pastoral support structures. We prepare all of our pupils to make reasoned, informed choices, judgments and decisions. Time is allocated in the Wellbeing programme (PSHE) and Form Time for the discussion of children's concerns and in developing the pupils confidence and self-respect which they require in order to develop healthy relationships, recognise abuse and to stay safe. This includes raising awareness of online safety, including the safe use of social media and issues such as cyberbullying, online sexual harassment, the sharing of indecent images consensually and non-consensually, viewing and sharing pornography and other harmful content.

### **Online safety**

In addition to the above, online safety is raised with parents at the start of year introductory meetings for parents and pupils in each year group and information is provided as a guide to parents on the Pastoral page of the School's website. The School also runs parent information and support sessions, inviting external experts to speak to parents on the subject of online safety.

URL filtering and application filters are in place and are regularly updated by our providers. All network users sign the School's Network Acceptable Use policy and pupils sign the iPad Student Acceptable Use policy when issued with their iPads. Guidelines for pupils and staff are updated regularly to support the ever-changing digital landscape.

Advice on teaching online safety can be found via the link below:

[Teaching online safety in schools](#)

Pupils' personal mobile phones are expected to be switched off during the School day and all pupil iPads are enrolled onto the School's wireless network. This means that pupils have monitored access to the internet throughout the School day.

During periods of whole or part-site closures, for example in response to increased cases of COVID-19, to provide remote education the protocols below are followed:

[Teacher Guidance on Home Learning](#)

[Online Student Home Learning Acceptable Use Policy](#)

### **Pupil support**

All pupils know that there are adults to whom they can turn to if they are worried, including Class Teachers and Form Tutors, Heads and Deputy Heads of Year, Pastoral Mentors, the School Counsellor, the Director of Pupil Wellbeing, the Director of Pastoral Care and Safeguarding, the Chaplain, the Independent Listeners (for Boarding Pupils) and the Sanatorium Staff. In particular:

- 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 and Deputy Heads of School and their team of Prefects (Praepostors) which specifically covers the importance of offering support and assistance to younger and to vulnerable pupils;
- We encourage pupil voice through a Pupil Council.

### **THE SCHOOL'S PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

If a member of the School staff, a volunteer or visitor to the School has concerns about a child's welfare, they must discuss their concerns as soon as possible with the DSL, Deputy DSL or, in their absence, the Headmaster. The DSL will decide whether a referral to Children's Social Care is appropriate for children at risk or whether in school support via the pastoral team, including a qualified counsellor, and/or other local and more appropriate external services (eg CYPMHS - Children and young people's mental health services or SET CAMHS in Southend, Essex and Thurrock) that can provide support to the child and family. It is important to note that any staff member can raise their concerns to children's social care directly. If there is any doubt, the School's clear policy is to seek the advice of the relevant, regional Social Care Services (see telephone contacts at the end of the policy). The DSL will make prompt contact with the police if a criminal offence is suspected.

Where there is urgent and immediate concern for the safety and welfare of a child or young person and where the child or young person has suffered or is likely to suffer significant harm, the DSL will contact the Initial Response Team (Essex – via Children and Families Hub Priority Line) immediately. It is again important to note that anybody can make a referral to children's social care directly. If social workers decide to carry out a statutory assessment, staff will do everything they can to support the assessment (supported by the DSL or Deputy DSL as required). Parental or pupil consent is not required for a referral to statutory agencies where there are concerns about a child's safety, were a parent to be informed at that stage. If

the child's situation does not appear to be improving, the staff member with concerns should raise their concerns again.

For non-urgent information, advice and guidance, the DSL will contact the Children and Families Hub Consultation Line. In the case of children who are not at immediate risk of significant harm but where there continues to be concern for their welfare, the School will work closely with the child, their parents and the relevant external agencies as appropriate. The family will be informed that contact is being made with the Children and Families Hub unless informing the parent would place the child at additional significant harm.

If there is an allegation about a member of staff, the Headmaster will contact the Local Authority Designated Officer (LADO) immediately (and certainly within 24 hours). The LADO is involved in cases where there is a concern or allegation that someone working or volunteering with children has or may have harmed a child, may have committed a criminal offence related to a child or has behaved towards a child or children in a way that indicates they may pose a risk of harm to children. Schools do not require the consent of parents to refer allegations to the LADO.

If a child makes a disclosure to a member of the School community, including a disclosure of child-on-child sexual violence and sexual harassment, the member of staff should follow the procedure below:

- Listen calmly to what the child is saying and reassure the child that they are doing the right thing by telling you. Reassure the child that they are being taken seriously and that they will be kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, whether in school, out of school or online, and no victim is ever made to feel ashamed for making a report, regardless of how long it has taken them to come forward. Where a child makes a report of sexual violence or sexual harassment it is important to explain that the law is in place to protect children and young people rather than criminalise them. Do not make a judgement about what you are being told or whether or not there is a case of abuse;
- Do not promise confidentiality and explain that you will pass on the information given to the School's DSL so that the appropriate action can then be taken;
- Do not ask leading questions;
- In a disclosure involving illegal images of a child, including consensual and non-consensual sharing of nude and semi nude images and/or videos (also known as sexting or youth produced sexual imagery), do not view or forward the images;
- In a disclosure involving an allegation of sexual violence or sexual harassment, if possible two members of staff should be present (preferably one of them being the DSL or a Deputy DSL);
- Make an accurate, written record of the conversation using the child's actual words where possible, including the time, date and place and any action taken. Sign and date the notes and then pass them on to the DSL immediately and add the notes and actions taken to CPOMS afterwards;
- Make sure the child is safe and supervised appropriately before seeking help from the DSL.

### **RECORD KEEPING (KCSIE, Part 1, September 2023)**

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. The School uses CPOMS for this purpose and all staff can raise and record a safeguarding concern using this system. Information must be kept confidential and stored securely.



Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome. If in doubt about recording requirements, staff should discuss with the DSL or Deputy DSL.

## **THE SCHOOL'S ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER MEMBERS OF SCHOOL COMMUNITY.**

The School has regard to Part Four of KCSIE (September 2023). Where abuse is suspected by members of staff, volunteers, contractors and the Headmaster:

**The following two aspects will be considered when an allegation is made:**

- Looking after the welfare of the child - the DSL or Deputy DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care (following KCSIE, Part 1);
- Investigating and supporting the person subject to the allegation - the case manager (the Headmaster or the Chairman of Governors if the allegation is against the Headmaster) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

### **STAFF (General)**

- Where a member of staff is suspected, including supply teachers, volunteers and contractors of having:
  - o behaved in a way that has harmed a child, or may have harmed a child and/or;
  - o possibly committed a criminal offence against or related to a child and/or;
  - o behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
  - o behaved or may have behaved in a way that indicates that they may not be suitable to work with children (including because of transferable risk e.g. behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children).
- **immediate action** will be taken by the School and the LADO will be informed **within one working day** of all allegations that come to the School's attention which may meet the harm threshold (as above) or that are made directly to the police. In the most serious case, where a crime has been committed or there is suspicion that a crime has been committed, the police will be informed. So as not to jeopardise statutory investigations the School will not undertake its own investigations of allegations without this prior consultation, other than to conduct basic enquiries in line with local procedures to establish the facts and to help them in determining whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation (KCSIE, Part 4, Section 1).
- All safeguarding concerns, even those which are low level, about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to children must be reported straight away to the Headmaster or the Headmaster of the Preparatory School (who will keep the Headmaster informed). Where there are concerns about the welfare of other children in the community or a member of staff's family, the Headmaster will discuss these concerns and make a risk assessment of the situation; a referral to children's social care may also be appropriate. Staff must also alert the Headmaster if they are the subject of an allegation;
- Immediate contact will then be made with the LADO, Essex Social Care, to discuss the allegation and agree a course of action including any involvement of the police. A



written record of this will be kept. A decision will be made by the Headmaster either to suspend the member of staff against whom an allegation has been made, pending the outcome of the LADO's investigation or to consider whether alternative arrangements should be put in place. The Headmaster may consult other people before reaching this decision, however, safeguarding the pupils on the School site is ultimately his responsibility and decisions about who is suitable to come on to the School site are his. An individual will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the individual notified of the reasons. Appropriate pastoral care and a named contact will be put in place for any suspended member of staff;

- The School will consider carefully whether the circumstances of the case warrants suspension or whether alternative arrangements should be put in place and, when making a decision about suspension the School will act on the advice of the LADO and the police;
- The School must make every effort to maintain confidentiality and guard against unwanted publicity as there are restrictions on the reporting or publication of allegations against teachers. These restrictions apply up to the point where the accused person is charged with an offence, or the Department for Education (DfE)/ Teacher Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case;
- The School will report promptly to the DBS and the TRA any person (whether employed, contracted, a volunteer or student) whose services are no longer used and the DBS referral criteria are met and full details provided of the circumstances in which the School ceased to employ this person;
- When deciding whether to make a referral, following an allegation of abuse, the Headmaster will not make his own decision over what appear to be borderline cases, but will discuss the issue with the LADO. This will ensure that the School does not jeopardise a police investigation should circumstances prove to be more serious than first thought;
- Where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate, for example in cases of unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence, the School will consider making a referral to the TRA. The School would make such a referral where a dismissal does not reach the threshold for DBS referral;
- Where a Boarder is concerned, the Independent Schools Inspectorate (ISI) will also be informed. (A contact number is provided at the end of this policy).

## **VOLUNTEERS**

- Where a volunteer is suspected of abuse a decision will be made by the Headmaster to suspend their involvement at School pending the outcome of the LADO's investigation.

## **SUPPLY TEACHERS AND CONTRACTORS**

- Where a supply teacher or contractor is suspected of abuse, the School will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures. In such cases, agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or children's social care. The School will usually take the lead because agencies do not have direct access to children or other School staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process (KCSIE, paragraphs 373-376).

### **ORGANISATIONS OR INDIVIDUALS USING THE SCHOOL PREMISES**

- If the School receives an allegation relating to an incident that happened when an individual or organisation was using the School premises for the purposes of running activities for children (for example sports associations), the School will follow its safeguarding policies and procedures, including informing the LADO.

### **BOARDING STAFF**

- Where a member of the boarding staff (accommodated in the Boarding House) is suspended pending investigation of a Child Protection nature the School will make arrangements for alternative accommodation away from the children.

### **HEADMASTER, CHAIRMAN OF GOVERNORS OR MEMBER OF THE GOVERNING BODY**

- Where abuse by the Chairman of Governors is suspected, the Headmaster should be approached directly. The LADO will be contacted within one working day;
- Where abuse by the Headmaster (Mr Michael Bond) or a member of the Governing Body is suspected, the Chairman of Governors, Sir Michael Snyder, should be approached directly without the Headmaster being informed first (in a case of an allegation against the Headmaster). It will be the Chairman's responsibility to contact the LADO within one working day;
- Where there is a conflict of interest in reporting the matter to the Headmaster, this should be reported directly to the LADO. The contact details of the local LADO can be found at the end of this policy.

### **LOW LEVEL CONCERNS**

All concerns about adults, no matter how small, should be shared responsibly with the right person (see below), recorded and dealt with appropriately in order to enable an open and transparent culture, to enable the early identification of concerning, problematic or inappropriate behaviour, to minimise the risk of abuse, ensure that adults working in in the School are clear about and act within professional boundaries in accordance with the School's values and ethos of the institution, and to protect those working in or on behalf of schools from potential false allegations or misunderstandings. Staff should also feel confident that they can self-refer. (KCSIE, Part 4, Section 2).

Where there is a low level concern or allegation against a member of staff which doesn't meet the 'harms test' (see section above), all such concerns should be reported to the Headmaster (or Chairman of Governors where there are concerns about the Headmaster). Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

KCSIE 2023 defines a low level concern as 'any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate contact outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.'

These behaviours may range from inadvertent to that which is ultimately intended to enable abuse. They include, for example:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;

- engaging with children on a one-to-one basis in a secluded area or behind a closed door;
  - humiliating pupils
- (KCSIE 2023, Section 4).3

When dealing with low level concerns and allegations, the School will follow the [Low level concerns protocol](#) which adheres to the procedures as outlined in KCSIE (Part 4, Section 2).

## **PUPILS**

Please refer to the section on Child-on-child abuse.

## **THE ROLE OF THE LADO**

The Local Authority Designated Officer provides advice to the Headmaster and DSLs regarding the action to be taken by the School where there are allegations of abuse against anyone working in the School. They preside over the investigation of any allegation or suspicion of abuse directed against anyone working in the School.

## **ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING AND WELFARE RESPONSIBILITIES**

The Governors ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are considered to be at a higher level of risk, who are members of the boarding community, in a private fostering arrangement or who are looked after by a local authority. This includes ensuring that staff have the information they need about the child's status, contact arrangements with parents, living and other care arrangements. If there are "looked-after" children in the School, a member of staff will be designated to have responsibility for the welfare and progress for "looked-after" children and will receive training for this role. As well as Child Protection training, there are regular tutor meetings held by Heads of Year to flag up pupil concerns, the DSL team meets weekly and there are regular meetings with the SAN nurses. There are also regular pastoral team meetings to discuss strategies to support pupils where there are causes for concern, including the involvement of outside agencies. In the Senior School, meetings are chaired by the Deputy Head (Pastoral) and are attended by Heads of Year, boarding Housemasters, the Chaplain, Director of Wellbeing/Senior Mental Health Lead and the Head of Learning Support (SENDCo). The Deputy Head (Pastoral) meets weekly with the Headmaster and briefs him on any child protection issues/concerns. In the Prep School, meetings are chaired by the Deputy Head (Pastoral) and are attended by the Director of EYFS, Deputy DSLs, SENDCo and Matron. The Deputy Head (Pastoral) meets weekly with the Prep Headmaster and briefs him on any child protection issues/concerns.

## **BOARDERS**

Appropriate arrangements are made to safeguard Boarders at the School. These include having regard to the National Minimum Standards for Boarding and following recommended procedures in respect of the recruitment and induction of all staff with responsibility for Boarders. If the DSL is not available, both the Headmasters of the Senior and Preparatory Schools live on the School site and have the required DSL training. All persons visiting boarding accommodation (e.g. visitors, outside delivery and maintenance personnel) are kept under sufficient staff supervision to prevent them gaining substantial unsupervised access to Boarders or their accommodation. The Boarding Housemasters are members of the pastoral team which meets regularly to discuss concerns about individual pupils as the need arises. Additionally, the Deputy Head (Pastoral) meets fortnightly with the Housemasters to discuss boarding matters. Boarding staff are aware of the potential for

child-on-child abuse in the boarding houses and of the potential for inappropriate pupil relationships and will follow the procedures outlined in this policy accordingly. As well as the pastoral support network in school, boarders have access to an independent listener.

## **EARLY YEARS FOUNDATION STAGE (EYFS)**

Staff personal use of cameras or video facilities in Early Years' setting is strictly forbidden. Permission must be requested from the Director of EYFS for mobile phones to be used during contact time with pupils. Children must be protected from any images being used inappropriately.

Following a recommendation from the Serious Case Review of the Vanessa George case and the review into the EYFS 2008 by Dame Clare Tickell, staff supervision is now mandatory in all early years settings (EYFS 2012).

Supervision is a regular, planned, accountable two-way process which should offer support and develop the knowledge, skills and values of an individual, group or team. Its purpose is to monitor the progress of professional practice and to help staff to improve the quality of the work they do, thus improving outcomes for children as well as achieving agreed objectives. Supervision also provides an opportunity to discuss sensitive issues including the safeguarding of children and any concerns raised about an individual or colleague's practice. There is a supervision policy in place.

## **COMPLAINTS**

If you have a complaint, the School's Complaints Procedure is available on the School's website or can be sent to you on request.

*This policy is updated at least annually and whenever needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. Our procedures and their implementation are reviewed regularly.*

## **IMPORTANT TELEPHONE NUMBERS**

Brentwood School	
Switchboard	01277 243243
<b>Designated Safeguarding Leads:</b>	
Senior School – Mrs Nicola Jenkin	01277 243275
Prep School – Mrs Susannah Trowell	01277 243398
EYFS – Mrs Roz Townsend	01277 243607
<b>Deputy Designated Safeguarding Leads:</b>	
Miss Rachel Bishop (Director of Pastoral Care and Safeguarding, Senior School)	01277 243305
Mrs Suzanne Bond (Pastoral Mentor, Senior School)	01277 243281
Mrs Michelle Carabache (Director of Wellbeing and Senior Mental Health Lead)	01277 243207
Ms Natalie Da Costa	01277 243316
Mrs Jenny Edwards (Pastoral Manager, Senior School)	01277 243233
Mrs Jag Khush (Head of Year, Senior School)	01277 243215
Mrs Melanie Knight (Director of Pastoral Care and Wellbeing, Prep School)	01277 243627

Mr Timothy Sawyer (Deputy Head, Operations and Co-Curricular, Prep School)	01277 243331
Mr Sarb Singh (Head of ITSS)	01277 243312
Chairman of Governors (via the Bursar) Sir Michael Snyder	01277 243251
Essex Safeguarding Children Board Essex Children and Families Hub 8.45am to 5.30pm Mon to Thurs 8.45am – 4.30pm Fridays	0345 603 7627
Out of office hours	0345 606 1212
Essex LADO	03330 139797
Southend Multi-Agency Safeguarding Hub 9am to 5.30pm Mon to Thurs 9am – 4.30pm Fridays	01702 215007
Out of office hours emergency duty team	0345 606 1212
Thurrock Multi-Agency Safeguarding Hub 9.00 - 4.30 Mon to Fri	01375 652802
Out of office hours	01375 372468
Havering Child Protection Team (9am-5pm)	01708 433222
Out of office hours	01708 433999
Redbridge Multi-Agency Safeguarding Hub 9am - 5pm Mon to Fri	020 8708 3885
Out of office hours emergency duty team	020 8708 5897
Barking and Dagenham Child Protection Team 9.00am - 4.45pm Mon to Fri	020 8227 3811
Out of office hours	020 8215 3000
Independent Schools Inspectorate	<a href="https://www.isi.net/safeguarding/concerns">https://www.isi.net/safeguarding/concerns</a>

### FGM

If you suspect a girl or young woman has been affected by or is at risk of FGM contact the police force in the area where the girl lives via 101. Always dial 999 in an emergency.

### Forced Marriage

Forced Marriage Unit 020 7008 0151  
Email: [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

### Suspicion of radicalisation

Contact the confidential Anti-Terrorist Hotline on 0800 789 321. You can also contact the NSPCC helpline on 0800 800 5000

If you think a child or the people around them are involved in radicalisation and there is an immediate risk of harm, call 999 straight away.

DfE helpline for non-emergency advice for staff and governors 020 7340 7264  
Email: [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

NSPCC – Child Protection Helpline 0808 800 5000  
NSPCC – Childline 0800 1111  
NSPCC – Whistleblowing Advice Line (help@nspcc.org.uk) 0800 028 0285

**In an emergency, dial 999**

## STAFF CODE OF CONDUCT (SAFEGUARDING)

All teachers, operational staff, coaches, peripatetic teachers, governors, contractors and regular visitors are expected to demonstrate the highest standards of personal and professional conduct, including proper regard for the ethos of Virtue, Learning and Manners, values, policies and practices of the School.

Everyone who works at Brentwood School has a role to play in safeguarding children and the safety and welfare of all our pupils is our highest priority. Relationships between all members of the School community must always be respectful and it is our teachers' responsibility to know everyone as an individual and to treat every child with respect and dignity, without discrimination, taking account of each child's individual needs. Safeguarding relies on clear communication across both Schools and the commitment and vigilance of all Staff. It is the responsibility of each member of staff and the wider School community to be alert to any sign of concern which may indicate that a child may be vulnerable, including those at risk from child-on-child abuse, radicalisation and being drawn into terrorism (Prevent duty) or at risk of so-called "honour based violence", including FGM and forced marriage or child sexual or criminal exploitation, and to take appropriate action following the procedures set out in our Safeguarding Policy, Keeping Safe in Education, Part 1 and Annex B (and summarised in Annex A) (September 2023), Behaviour Management and/or Anti-Bullying Policy.

To protect themselves and pupils, staff must avoid any conduct, comment or situation that could be misinterpreted or lay them open to allegations of abuse. Staff should try, as far as possible, not to be in an isolated situation with a pupil and be aware that, as a result of their knowledge and their authority, they are in a position of trust. **Any such concern, no matter how low level, must be flagged up at the earliest stage to the Headmasters of the Senior or Preparatory School.** Once staff have flagged up and followed up on their concerns, in cases of allegations against staff, there are restrictions on the reporting or publishing of allegations against teachers and so we must make every effort to maintain confidentiality and guard against unwanted publicity.

The following Staff conduct requirements are for the protection of both pupils and staff at Brentwood School:

- All teachers should adhere to the Teachers' Standards 2012 and safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- All staff must always maintain professional boundaries with pupils.
- Any sexual behaviour by a member of staff with or towards a pupil is completely unacceptable and will result in dismissal for gross misconduct. It is an offence for a member of staff in a position of trust to engage in sexual activity with a pupil under 18 years of age. Staff should avoid any form of touch or comment which is, or may be considered to be, inappropriate.
- Staff must alert a senior member of staff if they have concerns about the School's child protection and safeguarding procedures and their implementation. They should also follow up with the DSL if they do not think a concern has been acted on or may have been covered up. This does not impinge on their rights to notify an event under the School's Whistleblowing policy as outlined in the relevant employee handbook for either teaching or operational staff. If a member of staff is worried about being treated unfairly if they whistleblow or need external advice, they should contact the NSPCC whistleblowing advice line on 0800 028 0285.
- Staff should report any *Low level concerns* about a colleague's behaviour towards children to the Headmaster, including indications, verbal, written or physical, that suggest



a pupil may be infatuated with a member of staff. Colleagues should also self-refer if they are concerned about their own interactions with children, for example if a pupil asks them to engage with them on personal social media, there is a suspicion a child may be infatuated with them or has made an inappropriate comment to them.

- Any physical contact should be the minimum required for care, instruction or restraint (see Behaviour Management Policy). Physical contact, when used for instruction, for example in sport, music or drama, should only take place in a safe and open environment, the extent of the contact should be made clear and undertaken with the permission of the pupil. Corporal punishment and smacking is unlawful in all schools and early years settings (EYFS) and is not used or threatened. When physical intervention has taken place to protect a child, the incident should be recorded and reported to the Headmaster, or Designated Safeguarding Lead in his absence, and to the child's parents the same day or as soon as reasonably practicable.
- Staff should not use any form of degrading or humiliating treatment to punish a pupil and any punishment imposed must be proportionate, reasonable and account taken of the pupil's age, any special educational needs or disability they may have, and any religious requirements affecting them. The use of sarcasm, demeaning or insensitive comments, including sexist comments, towards children is completely unacceptable. Nicknames should not be used, pupils should be referred to by their first names and shouting should be avoided where possible e.g. as a warning in an emergency/safety situation.
- Staff have a duty to record and pass on as appropriate any information relating to an individual pupil, including medical needs and social concerns.
- Staff have a duty to register pupils at am and pm registrations (at the start of period 6 in the Senior School), in lessons and in after-school activities and to intervene early when there are concerns about a child's attendance. Pupils should not be dismissed early from any supervised session.
- Whilst it is recognised that teaching staff complete marking and lesson preparation off-site, it is the professional expectation that a normal working day on the School site finishes at 4.30 pm for teachers and 5.00 pm for Heads of Department and Heads of Year, so that staff are available to support pupils.
- Staff must follow up all unexplained absences, including absence from a lesson or activity and alert the Head of Year or a senior member of staff immediately if they believe that a child is missing from School and assist as necessary.
- Any staff use of social media and the School's IT network must have regard to the School's Safeguarding Policy, Social Media Policy, Whole School Network Acceptable Use policy and Prevent Duty. Staff need to be aware of the danger of social media and the internet being used to abuse children and young people and for online radicalisation and report any concerns immediately to the DSL.
- Any contact with current pupils or recent leavers should be transparent, professional and through established School channels and not via personal social media accounts. Staff must not use their personal email accounts to communicate with current pupils or recent leavers. They should also avoid using a personal mobile phone for this purpose, unless on a School trip or in emergencies when it is not possible to use a School mobile phone, in which case the member of staff must ensure that pupils remove the number from their phones at the end of the trip or visit.
- Brentwood School's policy is not to use private cars for the transportation of pupils for trips, fixtures or any other purpose except where the Headmaster gives specific permission or in an emergency. In such cases the Bursar/Deputy Bursar should be informed for insurance purposes and parental permission should be sought if possible.
- Staff accompanying School Trips are always deemed to be on duty unless formally released from duty by the Group Leader. The Group Leader must ensure that there are always two duty members of staff who abstain from alcohol for a 24-hour period. Where

just two staff accompany a trip, then both must abstain from alcohol for the entirety of the trip.

- Staff working in one to one situations should ensure that wherever possible there is visual access and/or an open door. They should always report any situation where a child becomes distressed or angry. Arranging to meet with pupils away from the School is not permitted unless the necessity for this is clear and approval is obtained from a senior member of staff, the pupil and their parents.
- All work with pupils and parents should usually be carried out in School. Should it be necessary to make a visit to the pupil's home, the level of risk should be assessed and appropriate risk management measures put in place, before any visit is made. Consideration should be given to any circumstances which might make the member of staff more vulnerable to an allegation being made e.g. hostility, child protection concerns, complaints or grievances. Other than in an emergency, staff should not enter a home if the parent/carer is absent, staff should have access to a mobile phone and emergency contact and they should record the visit.
- Pupils are entitled to respect and privacy and especially when changing, toileting and showering. However, staff must ensure there is an appropriate level of supervision in changing rooms in order to safeguard children, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils and sensitive to the potential for embarrassment.
- In the EYFS, staff must follow the School's intimate and personal care procedures. A signed record should be kept of all intimate and personal care tasks undertaken.
- In the boarding houses, staff should not enter a boarder's room without knocking and receiving express consent unless there is reasonable cause for concern. Pupils should not enter staff accommodation without permission and should not do so individually.
- All Staff and other visitors visiting the boarding houses must be subject to appropriate supervision by a member of the boarding staff on duty at the time.
- Where staff are unable to perform their duties through ill-health or medication they must alert their Head of Department or Line Manager. The prescribed absence procedures must be followed to ensure the appropriate supervision, safety and welfare of pupils.
- Staff dress and appearance must be smart, modest and professional (see Teachers' and Operational Staff's Handbooks).
- The School operates a no smoking policy, including e-cigarettes, on the School site. It also operates a zero tolerance of illegal drugs, psychoactive substances and the misuse of prescription drugs.
- Consumption of alcohol is not permitted on the School site except where the Headmaster has given his express permission.
- Employees must always display their identity card whilst in School. Staff must ensure that there is suitable supervision of any visitors or contractors they invite onto the School site.
- Staff must ensure that any visiting speakers, either booked by staff or pupils, are subject to appropriate checks to safeguard pupils.
- Staff accessing School data must ensure that confidential information is secure at all times, including away from the School site and not stored on personal devices. Staff should take care not to project confidential information from the School's database onto a whiteboard, e.g. when taking a register, staff should keep their passwords secure and should lock or log off the computer they are using when away from the device to prevent unauthorised access to data.
- Where there is good reason for staff to take photographs or video images of pupils on personal devices for educational purposes, they should be uploaded to Photoghost so they are not stored on these devices. Staff use of personal devices for photo or video facilities in EYFS is strictly forbidden. All staff should take extreme care to ensure that

children and young people are not exposed, through any medium, to inappropriate or indecent images.

- Staff should take care not to accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment (see the policy on Hospitality and Gifts. Rewards to pupils should be in line with the School's Behaviour Management policy.

For the protection of all parties and to ensure that Professional conduct and Safeguarding best practice are observed, any breach of the above may lead to disciplinary action.

## **ANNEXE A: TAKING, STORING AND USING IMAGES OF CHILDREN POLICY**

### **Purpose**

This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by Brentwood School ("the school"). It also covers the school's approach to the use of cameras and filming equipment at school events and on school premises by parents and pupils themselves, and the media.

It applies in addition to the school's parent contract, and any other information the school may provide about a particular use of pupil images (e.g. the CCTV Policy) and more general information about use of pupils' personal data contained in the school's Privacy Notice. Images of pupils in a safeguarding context are dealt with under the school's safeguarding policy.

### **Parental Consent**

Certain uses of images are necessary for the ordinary running of the school and the safety of pupils, such as CCTV and for your child's school security ID. Other uses are in the legitimate interests of the school and its community and unlikely to cause any negative impact on children. The school is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.

Parents who accept a place for their child at the school are invited to indicate that they agree to the school using images of their child as set out in this policy by agreeing to the school's terms and conditions. Parents will be asked to sign a consent form to enable the school to use a child's image for the purposes of promoting the school.

We hope parents will feel able to support the school in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the school; and for important administrative purposes such as identification and security.

Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Bursar in writing or complete a new parental consent form. The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

Parents should be aware that, from the age of 13 and upwards, UK GDPR recognises pupils' own rights to have a say in how their personal information is used – including images.

Parents and pupils will be asked to sign a new consent form for use of images at the start of the academic year in which the pupil reaches age 13.

### **Use of Pupil Images in School Publications**

Unless the relevant pupil or his or her parent has requested otherwise, the school will use images of pupils to keep the school community updated on the activities of the school, and for marketing and promotional purposes, including:

- on internal displays (including clips of moving images) on digital and conventional notice boards within the school premises;
- in communications with the school community (parents, pupils, staff, Governors and alumni) including by email, on the school intranet and by post;
- on the school's website and, where appropriate, via the school's social media channels, e.g. Twitter, Instagram and Facebook. Such images will not normally be accompanied by the pupil's full name without permission;
- in the school's prospectus, and in online, press and other external advertisements for the school. Such external advertising will not normally include pupils' names.

Images will usually be captured by school staff (who are subject to the Staff Code of Conduct and rules on how and when to take such images), or a professional photographer used for marketing and promotional purposes, or occasionally pupils. The school will only use images of pupils in suitable dress and the images will be stored securely and centrally.

### **Use of Pupil Images for Identification and Security**

All pupils are photographed when they join the school for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.

CCTV is in use on school premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the Privacy Notice and CCTV Policy.

### **Live Streaming**

Brentwood School uses live streaming for sports fixtures, performing arts and school events. The platforms used to live stream are via the [school's YouTube Channel](#) and Zoom. Age appropriate controls are in place for live streaming. Recordings of the events may be kept for use by the school for marketing and historical interest.

### **Use of Pupil Images in the Media**

Where practicably possible, the school will always notify parents in advance when the media is expected to attend an event or school activity in which school pupils are participating. Reasonable efforts will be made to ensure that pupils are not photographed or filmed by the media, nor such images provided for media purposes, if the parent, carer or themselves has refused permission for images of that pupil to be made in these circumstances.

The media often asks for the names of the relevant pupils to go alongside the images, and these will be provided where parents have been informed about the media's visit and either parent or pupil has consented as appropriate.

## Security of Pupil Images

Professional photographers and the media are accompanied at all times by a member of staff when on school premises. The school uses only reputable professional photographers and makes every effort to ensure that they hold any images of pupils securely, responsibly and in accordance with the school's instructions.

The school takes appropriate technical and organisational security measures to ensure that images of pupils held by the school are kept securely on school systems or within the secure app 'Photoghost' (which stores images in a cloud server) and are protected from loss or misuse. The school will take reasonable steps to ensure that members of staff only have access to images of pupils held by the school where it is necessary for them to do so.

All staff are given guidance on the school's Policy on Taking, Storing and Using Images of Pupils, and on the importance of ensuring that images of pupils are made and used responsibly, only for school purposes, and in accordance with school policies and the law.

## Use of Cameras and Filming Equipment (including mobile phones) by Parents

Parents, guardians or close family members (hereafter, parents) are only permitted welcome to take photographs of (and where appropriate, film) their own children taking part in school events, subject to the following guidelines, which the school expects all parents to follow:

- When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the school therefore asks that it is not used at indoor events.
- Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents or the pupil if aged over 13.
- **Parents should note that such images are for personal use only.** Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way, including direct to the media.
- Parents are reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. The school will always print a reminder in the programme of events where issues of copyright apply.
- Parents may not film or take photographs in any circumstance in which photography of filming may embarrass or upset pupils.

The school reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.



The school sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case CD, DVD or digital copies may be made available to parents for purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

### **Use of Cameras and Filming Equipment by Pupils**

All pupils are encouraged to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.

The use of cameras or filming equipment (including on mobile phones and iPads) is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset.

The misuse of images, cameras or filming equipment in a way that breaches this Policy or the school's:

- Anti-Bullying policy
- Data Protection Privacy Notice for Pupils, Parents, Guardians and Alumni
- Network Acceptable use Policy
- Safeguarding Policy and
- Behaviour Management Policy

is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.