

# POLICY AND PROCEDURES ON CHILD PROTECTION/SAFEGUARDING

December 2024

Approved by the School Improvement Committee: December 2024

Next review is due by: September 2025

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## **Important Contacts**

ROLE/ORGANISATION	NAME	CONTACT DETAILS	
Headteacher	Michael FitzGerald		
Lady Jane Grey Primary School	Designated Safeguarding Lead: Michael FitzGerald  Deputy Designated Safeguarding Lead/s: Robert Heaney, Deputy Headteacher Christopher Fletcher, KS1 Lead Rachel Burrows, SENCo Caroline Coxon, Mental Health & Pastoral Lead  Designated Teacher for Children in Care: Michael FitzGerald, Headteacher  Nominated Safeguarding Governor: Andrew Hurd		
Safeguarding and Performance Unit Contacts	Service Manager - Safeguarding and Performance Service Paul Dowd 01163057566 / 07538562293  LA Safeguarding Children in Education Officer Charlotte Davis 0116 305 6314  LADO / Allegations:  Kim Taylor / Lovona Brown 0116 305 4141  (Outside of office hours contact the Leicestershire Duty Team 0116 305 0005)  First Response Children's Duty (Tier 4 Same-day refered Telephone 0116 3050005)  Email childrensduty@leics.gov.uk  Address First Response Children's Duty  County Hall Championship Way Glenfield  LE3 8RF  All other referrals including Early Help (Children & Fahttp://lrsb.org.uk/childreport	Safeguarding and Performance Service 57566 / 07538562293  sildren in Education Officer 16 305 6314  : a Brown 0116 305 4141  hours contact the Leicestershire First Response Children's 05 0005)  dren's Duty (Tier 4 Same-day referrals) 8050005  nsduty@leics.gov.uk esponse Children's Duty ionship Way Glenfield  including Early Help (Children & Family Wellbeing) Service childreport eblowing line 0800 028 0285, email: help@nspcc.org.uk	

#### 1. Aims

- 1.1 Our school is committed to safeguarding and promoting the welfare of children and young people, and we expect all staff and volunteers to share this commitment. Creating a culture of safety and vigilance for our pupils is of paramount importance, we aim to:
  - a) create and maintain a safe environment
  - b) manage situations should child welfare concerns arise
  - c) create an atmosphere of trust in which pupils feel confident to confide any concern
  - d) help young people to understand the difference between acceptable and non acceptable behaviour
  - e) teach pupils to stay safe from harm
- 1.2 Pupils are taught about safeguarding, including E-safety as part of a broad and balanced curriculum. All staff within the school take welfare concerns seriously and encourage children and young people to talk about anything that worries them.

### 2. Legislation and statutory guidance

- 2.1 This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2023), the Maintained Schools Governance Guide and School Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.
- 2.2 This policy is also based on the following legislation:
  - a) Part 3 of the schedule to the <u>Education (Independent School Standards) Regulations 2014</u>, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
  - b) <u>The Children Act 1989</u> (and <u>2004 amendment</u>), which provides a framework for the care and protection of children.
  - c) Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the <u>Serious Crime Act 2015</u>, which places a statutory duty on teachers to report to the police when they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
  - d) <u>Statutory guidance on FGM</u>, which sets out responsibilities concerning safeguarding and supporting girls affected by FGM.
  - e) <u>The Rehabilitation of Offenders Act 1974</u>, which outlines when people with criminal convictions can work with children.
  - f) Schedule 4 of the <u>Safeguarding Vulnerable Groups Act 2006</u>, which defines what 'regulated activity' is in relation to children.
  - g) <u>Statutory guidance on the Prevent duty</u>, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

- h) The <u>Childcare</u> (Disqualification) and <u>Childcare</u> (Early Years Provision Free of Charge) (Extended <u>Entitlement</u>) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and <u>Childcare Act 2006</u>, which set out who is disqualified from working with children.
- i) The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- j) The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This includes making reasonable adjustments for disabled pupils. This means our governors and principal should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- k) The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- 2.2 This policy also meets requirements relating to safeguarding and welfare in the <u>statutory framework for</u> the <u>Early Years Foundation Stage</u>.
- 2.3 This policy also complies with the Leicestershire and Rutland Safeguarding Children Partnership Multi-Agency:

<u>Leicestershire and Rutland Safeguarding Children Partnership - Leicestershire and Rutland Safeguarding</u>
Partnerships Business Office

#### 3. Definitions

- 3.1 Safeguarding and promoting the welfare of children means:
  - a) Protecting children from maltreatment
  - b) Preventing impairment of children's mental and physical health or development
  - c) Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - d) Taking action to enable all children to have the best outcomes
- 3.2 **Child protection** is part of this definition and refers to activities undertaken to prevent children from suffering, or being likely to suffer, harm or significant harm.
- 3.3 **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- 3.4 **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

- 3.5 **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.
- 3.6 **Children** include everyone under the age of 18.
- 3.7 Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- 3.8 **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.
- 3.9 The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
  - a) The local authority (LA)
  - b) Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
  - c) The chief officer of police for a police area in the LA area
- 3.10 Designated Safeguarding Lead (DSL) this term is referred to throughout the policy and refers to either the Senior DSL or Deputy DSL in their absence.

## 4. Equality Statement

- 4.1 Some children have an increased risk of abuse, both online and offline and additional barriers can exist for some children with respect to recognising or disclosing concerns. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
- 4.2 We give special consideration to children who:
  - a) Have special educational needs (SEN) or disabilities (see section 10)
  - b) Are young carers
  - c) May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
  - d) Have English as an additional language
  - e) Are known to be living in difficult situations for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
  - f) Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

- g) Are asylum seekers
- h) Are at risk due to either their own or a family member's mental health needs
- i) Are looked after or previously looked after (see section 15)
- j) Are missing or absent from education for prolonged periods and/or repeated occasions
- k) Whose parent/carers has expressed an intention to remove them from school to be home educated. Local authorities will review the plan and work closely with parents/carers.

## 5. Roles and responsibilities

- 5.1 Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding Partners.
  - a) The local authority (LA) social care and children's safeguarding board
  - b) A clinical commissioning group for an area within the LA (Health)
  - c) The chief officer of police for a police area in the LA area

Our policy and procedures also apply to extended school and off-site activities.

- 5.2 The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:
  - a) Relationships & Positive Behaviour Policy
  - b) Pastoral support
  - c) PSHE/RSE curriculum tackles issues such as.
    - i. healthy and respectful relationships
    - ii. boundaries and consent
    - iii. stereotyping, prejudice, and equality
    - iv. body confidence and self-esteem
    - v. how to recognise positive relationship behaviours.

#### 5.3 All Staff

#### 5.3.1 All staff will

- a) Read and understand at least part 1 and Annex B of Keeping Children Safe in Education (KCSIE)
- b) Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- c) Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g., sites they need to visit or who they'll be interacting with online)
- d) Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns. This includes promoting a culture of openness and inclusivity and allowing the children dedicated access to a class 'Worry Monster', which are checked twice daily and weekly PHSE lessons.

#### 5.3.2 All staff will be aware of

- a) Systems and procedures that support safeguarding, including this policy; the school's Behaviour Policy; the online safety policy; the staff code of conduct; the identity/role of the designated safeguarding lead (DSL) and DSL teams; and the necessary safeguarding response to children who go missing from education (CME)
- b) Staff receive annual child protection and safeguarding update training, Prevent training, annual harmful sexual behaviour and any other relevant training including the whistleblowing policy, which enhances staffs understanding of keeping children safe and contextual training to meet the needs of the school including how to take action if they are concerned
- c) The early help process and their individual and team role, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- d) The process for making referrals to the local authority children's social care and for statutory Reassessments that may follow a referral, including the role they might be expected to play.
- e) What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- f) The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.
- g) The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- h) The fact that children can be at risk of harm inside and outside of their home, at school and online.
- i) The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.
- j) What to look for to identify children who need help or protection

#### 5.4 The Designated Safeguarding Lead (DSL)

- 5.4.1 The DSL is a member of the senior leadership team and takes lead responsibility for child protection and wider safeguarding. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- 5.4.2 Managing referrals to the local authority children's social care, to the Channel programme, to the Disclosure and Barring Service for staff dismissed for safeguarding concerns (as required), and to the Police where a crime may have been committed. Please see 'Important contacts' (page 4) for the school's Safeguarding Team.
- 5.4.3 Working with others to act as a source of support and advice, to act as a point of contact for the safeguarding partners, to liaise with the headteacher about issues especially to do with ongoing enquiries under section 47 of the Children Act 1989 and police investigations, to liaise with staff when deciding to make a referral to relevant agencies so that children's needs are considered holistically, to liaise with the senior mental health lead, to promote supportive engagement with parents and carers, to take the lead in promoting educational outcomes for children in need and those with a social worker, to liaise with the School Improvement Committee and the Local Authority on any deficiencies brought to the attention of the School Improvement Committee and how these should be rectified without delay.

#### 5.4.4 They will:

- a) Be the first point of contact for staff concerning child welfare and child protection matters.
- b) Be aware of pupils who have a social worker.
- c) Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues with teachers and school leadership staff.
- d) Provide advice and support to other staff on child welfare and child protection matters, including delivering staff annual training and termly updates.
- e) Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- f) Contribute to the assessment of children.
- g) Refer suspected cases, as appropriate to the relevant body (Local Authority children's Social care, Channel Programme, Disclosure and Barring Service and/or police), and support staff who make such referrals directly.
- h) Complete safeguarding induction e.g., agency staff, including obtaining safer recruitment information for the SCR, if appropriate.
- i) Record, monitor and track all referrals.
- j) Carry out regular quality assurance on all records and referrals. The DSL quality assures by monitoring of safeguarding audit trail and liaising with the safeguarding team
- k) Complete safeguarding induction e.g., agency staff including obtaining safer recruitment information for the SCR if appropriate.
- I) Record, monitor and track referrals

- m) The lead DSL quality assures safeguarding procedures daily through monitoring the electronic safeguarding system.
- n) Ensure that child protection information is transferred to the pupil's new school within 5 working days by secure electronic transfer or hand delivered if the allocated school is in the local area. For children who have transferred outside of the local area files are sent through recorded delivery using Royal Mail. There may be times when the transfer of files is not possible within the recommended time frame and reasonable adjustments are made in collaboration with the new school. Files are signed for on receipt and acknowledgement returned to the school. The school liaises with the new provider in advance of enrolling children with a higher level of need in terms of safeguarding including historical concerns, to ensure relevant information is passed on and to highlight vulnerable pupils.
- o) Ensuring risk assessments put in place for pupils are recorded on our safeguarding electronic system. This includes those children at risk of CSE, at risk of CCE and children who have other specific vulnerabilities. Details are held on the school's electronic safeguarding record and names are included on the vulnerable children's list held by the safeguarding team.
- p) Have a good understanding of harmful sexual behaviour through annual online training, which is delivered to all staff who have direct contact with children.

#### 5.4.5 The DSL will also

- a) Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- b) Undergo DSL training every two years (updating at least annually via bulletins etc) and to attend Prevent awareness training, in order to understand assessment and referral processes, to contribute effectively to child protection conferences including the importance of sharing information, to understand the lasting impact that adversity and trauma can have on children and how to respond to this, to be alert to children with specific needs e.g. SEND, those with health conditions and young carers, to understand the unique risks associated with online safety.
- c) Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- d) Have a good understanding of the filtering and monitoring systems and processes in place at our school.
- 5.4.6 The full responsibilities of the DSL and deputies are within the appendices of this policy.

#### 5.5 Board of Local Governor Board – School Improvement Committee

- 5.5.1 All Governors have an enhanced DBS which is recorded on the single central record (SCR) and 128 management checks are carried out and recorded.
- 5.5.2 Governors have a key responsibility for monitoring safeguarding and child protection across the school.

#### 5.5.3 Responsibilities include:

- a) To ensure a child protection /safeguarding policy is in place.
- b) To ensure procedures are in place for dealing with allegations against a member of staff not just within the school setting but also staff's conduct outside the school setting which is known as the 'harm' test. This is concerning a person's conduct outside the school and need not include a child, for example, domestic abuse of a partner.
- c) The Chair of the Committee (or, in the absence of a Chair, the Vice Chair) deals with any safeguarding concerns or allegations of abuse made against the Headteacher, in liaison with the Local Authority Allegations Manager (LADO).
- d) To ensure appropriate staff training is in place, including online safety training and that it is updated regularly and in line with advice from the safeguarding partners.
- e) Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - i. Making sure that the leadership team and staff are aware of the provisions in place,
  - ii. and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - iii. Reviewing the <u>DfE's filtering and monitoring standards</u>, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- f) To ensure there is a member of the committee who is responsible for and has been trained for safeguarding, child protection and safer recruitment.
- g) To ensure policies and procedures in the school are reviewed annually, or earlier where necessary.

#### 5.5.4 They will also make sure:

- a) The DSL has the appropriate status, funding, resources and authority to carry out their job effectively.
- b) The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- c) Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies. Concerns are reported via the safeguarding system which are managed without delay by the DSL team. Appropriate and proportionate actions will be taken such as speaking to the child and contacting parents/carers, police or other agencies. An appropriate risk assessment may be put in place.

- d) Senior Leaders and the DSL are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
- e) The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). See flow chart section 15.5
- f) That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- g) Staff work closely with parents, carers and pupils to understand and respond to their needs as appropriate. Outside agencies may be called upon to provide additional bespoke training and information sharing concerning specific pupils. This is updated and reviewed on a case-by-case basis. For more information see SEND Policy and Information Report.
- h) Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - i. Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed. Refer to Safer recruitment checklists that are completed, dated, and signed by the employer before any activity takes place. These are kept in a file until placement ends and/or provisions cease.
  - ii. Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - iii. Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- 5.5.5 Safeguarding governor will undertake the following specific training:
  - a) Safeguarding training through Governor Development Services.

#### 5.6 The Headteacher

- 5.6.1 The Headteacher is responsible for the implementation of this policy, including:
  - a) Ensuring that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction
  - b) Communicating this policy to parent/carers when their child joins the school and via the school website
  - c) Ensuring that the DSL has appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent
  - d) Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly. This must include online safety training and ensure staff have clear understanding of the filtering and monitoring arrangements across the school.
  - e) Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
  - f) All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle-blowing helpline number is also available (0800 028 0285).
  - g) All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care (Children and Family Specialist Services) or the Police.
  - h) Ensuring the relevant staffing ratios are met, where applicable
  - i) Making sure each child in the Early Years Foundation Stage is assigned a key person when they are enrolled and allocated a key worker group within the setting.
  - j) Overseeing the safe use of technology, mobile phone, and cameras in the setting.

#### 5.7 Virtual School Heads

5.7.1 Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g., DSLs, Designated teachers for Looked After Children, SENCOs, social workers, mental health leads and others.

## 6. Confidentiality

- 6.1 Please see the School's Data Protection Policy.
- 6.2 Personal information about all pupils' families is regarded by those who work at Lady Jane Grey Primary School as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality:
  - a) Staff understand that they need to know only enough to prepare them to act with sensitivity to a pupil and to refer concerns appropriately. The DSLs and Principals will disclose information about

- a pupil to other members of staff on a need-to-know basis only. It is inappropriate to provide all staff with detailed information about the pupil, incidents, the family, and the consequent actions.
- b) All staff operate within the information-sharing advice document July 2018. Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many Serious Case Reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.'

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/7 21581/I nformation\_sharing\_advice\_practitioners\_safeguarding\_services.pdf

## 7. Recognising abuse and taking action

- 7.1 Staff, volunteers, and governors must follow the procedures set out below in the event of a safeguarding issue.
- 7.2 All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:
  - a) Is disabled
  - b) Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
  - c) Is a young carer
  - d) Is bereaved
  - e) Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
  - f) Is frequently missing/goes missing from education, care or home
  - g) Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
  - h) Is at risk of being radicalised or exploited
  - Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
  - j) Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - k) Is misusing drugs or alcohol
  - I) Is suffering from mental ill health
  - m) Has returned home to their family from care
  - n) Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
  - o) Is a privately fostered child
  - p) Has a parent or carer in custody or is affected by parental offending
  - q) Is missing education, or persistently absent from school, or not in receipt of full-time education
  - r) Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- 7.3 Please note in this and subsequent sections, you should take any references to the DSL to mean "the Senior/Deputy DSL or Safeguarding Team."

## 8. If a child is suffering or likely to suffer harm, or in immediate danger

- 8.1 Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral.
- 8.2 Tell the DSL as soon as possible if you make a referral directly

First Response Children's Duty (Tier 4 Same-day referrals):

Email: childrensduty@leics.gov.uk

Tel: 0116 3050005

GOV.UK webpage for reporting child abuse to your local council:

https://www.gov.uk/report-child-abuse-to-local-council

## 9. If a child makes a disclosure to you

- 9.1 If a child discloses a safeguarding issue to you, you should:
  - a) Believe what the pupil is communicating to you. Allow them time to talk freely and do not ask leading questions
  - b) Stay calm and do not show that you are shocked or upset
  - c) Do not make personal comments e.g. if a pupil asks "what do you think?"
  - d) Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
  - e) Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
  - f) Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
  - g) Write-up and submit via the electronic safeguarding system (by the end of the day), alerting the DSL/Principal (STAFF MUST NOTIFY THE DSL/PRINCIPAL IN PERSON OF ANY CONCERNS WHERE A CHILD MAY BE AT RISK IF THEY WERE TO GO HOME). Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so.

## 10. If you discover FGM has taken place or a pupil is at risk of FGM

- 10.1 The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs".
- 10.2 FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'
- 10.3 Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.
- 10.4 Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally (with support from the DSL). This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- 10.5 Unless they have been specifically told not to disclose, involve children's social care as appropriate.
- 10.6 **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL, **immediately**.

- 10.7 The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
- 10.8 **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL, <u>immediately</u> and follow our local safeguarding procedures.

## 11. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

- 11.1 Figure 1 (section 15.9) illustrates the procedure to follow if you have any concerns about a child's welfare.
- 11.2 Where possible, speak to a member of the safeguarding team and record your concerns following the normal procedures and a decision on the course of action will be agreed.
- 11.3 If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from the local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
- 11.4 Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL or deputy DSL as soon as possible or a senior leader.
- 11.5 The school uses CPOMS to report and record all safeguarding matters, including all direct referrals to children's social care.
- 11.6 Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. The school will therefore require close liaison with the designated safeguarding lead (or a deputy) and the SENCO. The school will provide extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place
- 11.7 Where appropriate, we will discuss any concerns about a child with the child's parents/carers. The DSL will normally do this in the event of a concern or disclosure.
- 11.8 Other staff will only talk to parents/carers about any such concerns following consultation with the DSL. If we believe that notifying the parents/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- 11.9 In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved unless this would impact any potential investigation or place any children at risk of harm.
- 11.10 Any meetings with parents/carers that relate to safeguarding (including pastoral meetings for attendance/behaviour/wellbeing) will be recorded on CPOMS.

## 12. Early help

12.1 If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

- 12.2 The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
- 12.3 Procedures for early help may include:
  - a) Referral to the Hive: for children with a need for emotional support
  - b) Family support
  - c) CAMHS: Child Adolescent Mental Health Service
  - d) Community Public Health: for health support
  - e) Speech and Language Service: for children who may be struggling with communication
- 12.4 Please see the school's DSL for more information.

#### 13. Referral

- 13.1 If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
- 13.2 If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.
- 13.3 The local authority will decide within 2 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- 13.4 If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

## 14. If you have concerns about extremism - The PREVENT Strategy

- 14.1 The Prevent Officer is Michael FitzGerald
- 14.2 Friends, family, and school are well placed to spot the signs of potential harm being caused by radicalisation and terrorism. We will trust our instincts and encourage you to share your concerns in confidence. If we act early, we won't be wasting police time and won't ruin lives, but we might save them.
- 14.3 To share a concern, call the act early helpline on 0800789321 or online at Crime Stoppers <u>Independent</u> <u>UK charity taking crime information anonymously | Crimestoppers (crimestoppers-uk.org)</u>
- 14.4 Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence
- 14.5 Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  - a) a. Negate or destroy the fundamental rights and freedoms of others; or
  - b) b. Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights.

c) c. Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

#### 14.6 Terrorism is an action that:

- i. i. Endangers or causes serious violence to a person/people.
- ii. Ii. Causes serious damage to property; or
- iii. Iii. Seriously interferes or disrupts an electronic system
- 14.7 The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause that endangers or causes serious violence to a person/people; causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause'

#### 14.8 The PREVENT Strategy aims:

- a) respond to the ideological challenge of terrorism and the threat we face from those who promote it
- b) Prevent people from becoming involved with or supporting and ensure that they are given appropriate advice and support
- c) Work with sectors and institutions where there are risks of radicalisation that need to be addressed

#### 14.9 The school's PREVENT risk assessment arrangements:

- a) Annual staff training is in place to raise awareness and support colleagues in identifying children at risk or susceptible of being radicalised or drawn into terrorism
- b) Robust reporting procedures are in place; staff know to report their concerns to the Prevent Officer who is the DSL
- c) Internet safety monitoring and e-safety policy
- d) Safer recruitment procedures are in place and adhered to
- e) Governors have appropriate training
- f) Governors carry out regular monitoring and quality assurance
- g) Concerns raised and discussed with colleagues from the NCC Channel programme as appropriate
- h) Pupils identified as having extremist ideologies or becoming radicalised are considered vulnerable leading to monitoring by the safeguarding team. This includes recording concerns on the pupil's safeguarding record.
- 14.10 Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or <u>Channel</u>, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team. If there are concerns that the child is at risk of harm then a referral must be

made to children's social care regardless of whether a Channel referral is deemed appropriate. An individual will be required to give consent before any support through the Channel programme is provided.

#### 14.11 Staff training

- a) Staff receive annual training to raise awareness and remind them of the statutory duties if pupils are identified as at risk of being involved or becoming involved in extremism or becoming radicalised.
- b) Lead DSL to attend training through the LA training schedule in line with KCSIE

#### 14.12 Supporting Children

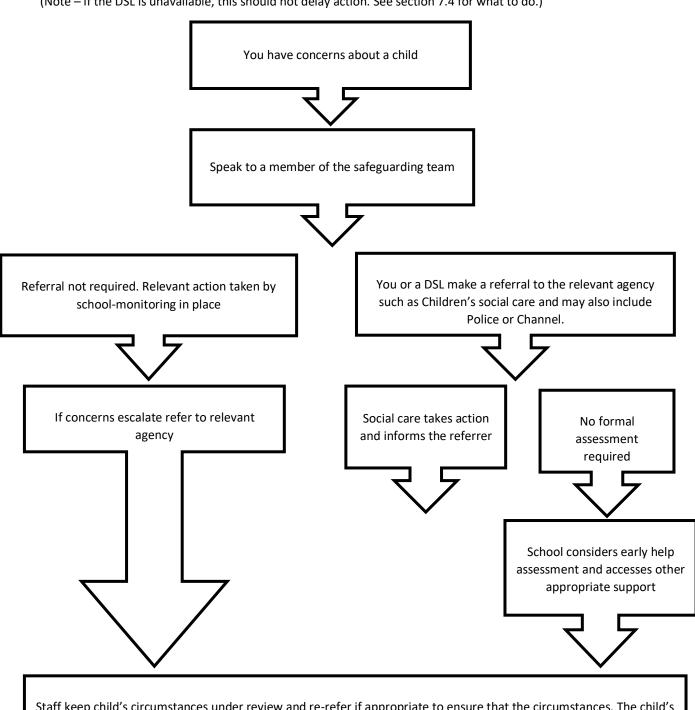
- a) Internet filtering security disables access to sites and content which are deemed as putting a child at risk of becoming involved in extremism or radicalisation. The I.T support service has access to all data and history on devices linked to the school and can identify and alert the school to risks/potential risks.
- b) Fundamental British Values curriculum (FBV) is supported by regular pupil forums, school council, and weekly assemblies.

#### 14.13 Supporting families. The school supports families through:

- a) The promotion of British values which are shared via newsletters and the school's website
- b) Keeping stakeholders informed of forthcoming events and strategies which challenge British values and having an open-door policy where parents, carers and members of the school community can speak to us regarding concerns around radicalisation.
- 14.14 The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism concerning a pupil. You can also email <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>. Note that this is not for use in emergencies.
- 14.15 In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
  - a) Think someone is in immediate danger
  - b) Think someone may be planning to travel to join an extremist group
  - c) See or hear something that may be terrorist-related

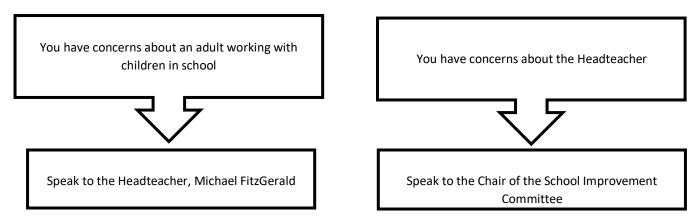
## 15. Figure 1: Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



Staff keep child's circumstances under review and re-refer if appropriate to ensure that the circumstances. The child's best interests are the priority.

## 16. Concerns about a staff member, supply teacher or volunteer



- 16.1 If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the Headteacher. If the concerns/allegations are about the Headteacher, speak to the Chair Governors Andrew Hurd.
- 16.2 This applies to all cases where it is alleged that a staff member, supply teacher or volunteer has:
  - a) behaved in a way that has harmed a child, or may have harmed a child
  - b) possibly committed a criminal offence against or related to a child
  - c) behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
  - d) behaved or may have behaved in a way that indicates they may not be suitable to work with children
- 16.3 Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer, or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO).
- 16.4 If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

## 17. Non-recent allegations

17.1 Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

#### 18. Low-level concerns

18.1 In line with Keeping Children Safe in Education, we recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately. The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored and reinforced by staff.

#### 18.2 Definition of low-level concerns

- 18.2.1 The term 'low-level' concern does not mean that the concern is insignificant, it means that the threshold set out at the start of 8.7 has not been met. A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the school/trust may have acted in a way that.
  - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
  - b) examples of such behaviour could include, but are not limited to:
    - i. being over-friendly with children
    - ii. having favourites
    - iii. taking photographs of children on a personal mobile phone
    - iv. engaging with a child on a one-to-one basis in a secluded area or behind a closed door
    - v. using inappropriate sexualised, intimidating, or offensive language. *Such behaviour can exist on a spectrum.*

#### 18.3 Sharing low-level concerns

18.3.1 Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Headteacher. Any concerns about the Headteacher should be reported to the Chair of Governors, Andrew Hurd.

#### 18.4 Recording low-level concerns

18.4.1 All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which the concern arose, and action is taken, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation. Records will be reviewed termly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a concern to meeting the harms threshold.

#### 18.5 Low-level concerns and references

18.5.1 Low-level concerns will not be included in references unless they relate to issues that would normally be included in a reference, for example, misconduct or poor performance. Where a low-level concern has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

#### 18.6 Early years providers

- 18.6.1 All allegations are followed up with the LADO within 48 hours and referred to the LADO.
- 18.6.2 Where concerns are substantiated and following advice from the LADO references may be made to the Debarring Service and Ofsted.

## 19. Allegations of abuse made against other pupils

- 19.1 We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".
- 19.2 We also recognise the gendered nature of child-on-child abuse (previously known as peer-on-peer abuse). However, all child-on-child abuse is unacceptable and will be taken seriously through our referral processes and curriculum that helps pupils understand what is and what is not ok.
- 19.3 Most cases of pupils hurting other pupils will be dealt with under the school's Behaviour Policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. Child-on-child abuse is most likely to include, but may not be limited to:
  - a) Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - b) Abuse in intimate personal relationships between peers
  - c) Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element that facilitates, threatens and/or encourages physical abuse)
  - d) Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element that facilitates, threatens and/or encourages sexual violence)
  - e) Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse
  - f) 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
  - g) Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth-produced sexual imagery)
  - h) Up-skirting, which typically involves taking a picture under a person's clothing without their permission, to view their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
  - i) 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).
  - j) Use of drugs or alcohol, where a pupil is forced/coerced to participate in.

- 19.4 If a pupil makes an allegation of abuse against another pupil:
  - a) You must record on CPOMS the allegation and tell the DSL, but do not investigate it.
  - b) The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
  - c) The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
  - d) The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- 19.5 We will minimise the risk of child-on-child abuse by:
  - a) Challenging any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, or sending sexual images
  - b) Being vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
  - c) Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
  - d) Ensuring pupils can easily and confidently report abuse using our reporting systems
  - e) Ensuring staff reassure victims that they are being taken seriously
  - f) Being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
  - g) Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
  - h) Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
  - i) Ensuring staff are trained to understand:
    - i. How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - ii. That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening staff should maintain an attitude of "it could happen here"
    - iii. That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
      - Children can show signs or act in ways they hope adults will notice and react to
      - A friend may make a report

- A member of staff may overhear a conversation
- A child's behaviour might indicate that something is wrong
- iv. That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- v. That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- vi. The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- vii. That they should speak to the DSL if they have any concerns
- viii. That social media is likely to play a role in the fall-out from any incident or alleged incident, including potential contact between the victim, alleged perpetrator(s) and friends from either side.

## 20. Sharing of nudes and semi-nudes ('Sexting')

#### 20.1 Your responsibilities when responding to an incident

- 20.1.1 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or seminude images/videos including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth-produced sexual imagery'), you must report it to the DSL immediately.
- 20.1.2 The DSL will report incidents of this nature to the police in the first instance to establish whether a criminal offence has taken place. The DSL will ensure the police are aware of any referrals made to social care.

#### 20.1.3 You must **not**:

- a) View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it
- b) (if you have already viewed the imagery by accident, you must report this to the DSL)
- c) Delete the imagery or ask the pupil to delete it
- d) Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- e) Share information about the incident with other members of staff, pupil(s), or parents/ carers that are not directly involved with the pupil.
- f) Say or do anything to blame or shame any young people involved
- 20.1.4 You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL

#### 20.2 Initial review meeting

- 20.2.1 Following a report of an incident, the DSL/Headteacher will organise an initial review meeting with appropriate school staff this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
  - a) Whether there is an immediate risk to pupil(s)
  - b) If a referral needs to be made to the police and/or children's social care
  - c) If it is necessary to view the image(s) to safeguard the young person (in most cases, images or videos should not be viewed)
  - d) What further information is required to decide on the best response
  - e) Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
  - f) Whether immediate action should be taken to delete or remove images or videos from devices or online services
  - g) Any relevant facts about the pupils involved which would influence risk assessment
  - h) If there is a need to contact another school, college, setting or individual
  - i) Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
  - j) The DSL will make an immediate referral to police and/or children's social care if:
    - i. The incident involves an adult
    - ii. There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
  - k) What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
  - 1) The imagery involves sexual acts and any pupil in the images or videos is under 13
  - m) The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- 20.2.2 If none of the above applies then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

#### 20.3 Further review by the DSL

- 20.3.1 If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
- 20.3.2 They will hold interviews with the pupils involved (if appropriate)
- 20.3.3 If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

#### 20.4 Informing parent/carers

20.4.1 The DSL will inform parent/carers at an early stage and keep them involved in the process unless there is a good reason to believe that involving them would put the pupil at risk of harm.

#### 20.5 Referring to the police

20.5.1 If it is necessary to refer an incident to the police, this will be done via calling 101.

#### 20.6 Recording incidents

- 20.6.1 All sexting incidents and the decisions made in responding to them will be recorded via our electronic safeguarding system, CPOMs.
- 20.7.3 Teaching follows best practice in delivering safe and effective education, including:
  - a) Putting safeguarding first
  - b) Approaching from the perspective of the child
  - c) Promoting dialogue and understanding
  - d) Empowering and enabling children and young people
  - e) Never frightening or scare-mongering
  - f) Challenging victim-blaming attitudes

#### 20.7 Notifying parent/carers

- 20.7.1 Where appropriate, we will discuss any concerns about a child with the child's parent/carers. The DSL will normally do this in the event of suspicion or disclosure.
- 20.7.2 Other staff will only talk to parent/carers about any such concerns following consultation with the DSL.
- 20.7.3 If we believe that notifying the parent/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- 20.7.4 In the case of allegations of abuse made against other children, we will normally notify the parent/carers of all the children involved

#### 20.8 Reporting systems for our pupils

20.8.1 Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

- 20.8.2 We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.
- 20.8.3 To achieve this, we will invite all children to the annual pupil survey, promote reporting through the day-to-day culture of the school and encourage children to share concerns with a trusted adult or via a 'worry monster'.
  - a) Have systems in place for pupils to confidently report abuse by facilitating a culture of trust and acceptance across the school and encouraging open dialogue between trusted adults and children.
  - b) Ensure our reporting systems are well-promoted, easily understood and easily accessible for pupils by keeping visual information current and accurate, by colleagues being visible and accessible in school and by being transparent with children when considering how best to meet their needs.
  - c) Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

## 21. Pupils with special education needs and disabilities

- 21.1 We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:
  - a) Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
  - b) Pupils being more prone to peer group isolation than other pupils
  - c) The potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
  - d) Cognitive understanding being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so
  - e) Communication barriers and difficulties in overcoming these barriers
- 21.2 Reasonable adjustments are made for children to enable them to access the curriculum and support emotional, social and academic development and follow a graduated response as outlined in the SEN code of practice.

## 22. Children missing from education

- 22.1 We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parent /carers when pupils are not at school.
- 22.2 If there is a concern a child may be missing from education (CME), the school's DSL will follow Leicestershire's protocols and procedures for reporting CME.

- 22.3 We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable when removing a child's name from the admission register at non-standard transition points.
- 22.4 Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.
- 22.5 If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the Police, if the child is in immediate danger or at risk of harm.

## 23. Together we can stop child sexual abuse

23.1 No child should be a victim of sexual abuse (please see appendix 1) and Lady Jane Grey is committed to preventing children from becoming/being victims of sexual abuse. If staff have any concerns, they must report these to the DSL immediately or/and contact the NSPCC on:

Tel: 0800 800 5000 Email: help@nspcc.org.uk

For further information please visit the 'Stop abuse together campaign' website

https://stopabusetogether.campaign.gov.uk/

## 24. Contextual safeguarding

- 24.1 Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means that assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.
- 24.2 Children's social care assessments should consider such factors so schools must provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

## 25. Pupils with a Social Worker

25.1 Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.

- 25.2 The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- 25.3 Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare, and educational outcomes. For example, it will inform decisions about:
  - a) Responding to unauthorised absence or missing education where there are known safeguarding risks
  - b) The provision of pastoral and/or academic support

#### 26. Looked after children

- 26.1 The Designated Teacher for children in care is Michael FitzGerald, Headteacher
- 26.2 We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
  - a) Appropriate staff have relevant information about children's looked-after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
  - b) The DSL has details of children's social workers and relevant virtual school heads.
- 26.3 Our school has an appointed designated teacher (please see 'Important contacts'), who is responsible for promoting the educational achievement of looked-after children, in line with statutory guidance.
- 26.4 The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- 26.5 As part of their role, the designated teacher will:
  - a) Work closely with the DSL to ensure that any safeguarding concerns regarding a Looked After Child are quickly and effectively responded to
  - b) The designated teacher attends all multi-agency meetings and reviews and provides a written report if required in advance. In the absence of the Designated Teacher, a DSL will attend reviews on their behalf.
  - c) Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

## 27. Online Safety and the use of mobile technology

- 27.1 We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.
- 27.2 To address this, our school aims to:
  - a) Have robust processes in place to ensure the online safety of pupils, staff, volunteers, and governors

- b) Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- c) Set clear guidelines for the use of mobile phones for the whole school community
- d) Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

#### 27.3 The 4 key categories of risk

- 27.4 Our approach to online safety is based on addressing the following categories of risk:
  - a) **Content** being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
  - b) **Contact** being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults to groom or exploit them for sexual, criminal, financial or other purposes.
  - c) Conduct personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
  - d) **Commerce** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.
- 27.5 To meet our aims and address the risks above we will:
  - a) Using the PSHE Curriculum, educate pupils about online safety as part of our curriculum. For example,
    - i. The safe use of social media, the internet and technology
    - ii. Keeping personal information private
    - iii. How to recognise unacceptable behaviour online
    - iv. How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
  - b) Ensure staff complete relevant training on safe internet use and online safety issues, including cyberbullying and the risks of online radicalisation.
  - Educate parents/carers about online safety via our website, communications sent directly to them
    and during parents' evenings. We will also share clear procedures with them, so they know how
    to raise concerns about online safety
  - d) Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the <a href="DfE's guidance on searching, screening and confiscation">DfE's guidance on searching, screening and confiscation</a>
  - e) Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above).

- f) Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- g) Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.
- 27.6 For further information please refer to the school's Online Safety Policy.

## 28. Pupils who are lesbian, gay, bisexual or gender questioning

- 28.1 We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- 28.2 We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.
- 28.3 When families/carers are making decisions about support for gender-questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.
- 28.4 When supporting a gender-questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have a wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).
- 28.5 We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.
- 28.6 Risks can be compounded when children lack trusted adults with whom they can be open. We, therefore, aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

## 29. Mobile phones and cameras

- 29.1 Staff will not take pictures or recordings of pupils on their personal phones, smartwatches, or cameras.
- 29.2 We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

## 30. Complaints and concerns about school

30.1 Complaints against staff that are likely to require a child protection investigation will be handled following our procedures for dealing with allegations of abuse made against staff (section 8.7). Also, please refer to the School's complaints policy.

## 31. Whistle-blowing

31.1 Please see the School's Whistle-blowing policy.

https://www.ladyjanegreyprimary.org.uk/about-us/key-policies/

NSPCC Whistle-blowing helpline: 0800 0280285

## 32. Record keeping

- 32.1 We will hold records in line with statutory guidance.
- 32.2 All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded via the electronic safeguarding system. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.
- 32.3 Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- 32.4 Safeguarding records relating to individual children will be retained in line with KCSIE 2024 and statutory guidance.
- 32.5 If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. Also, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

### 33. Training

#### 33.1 All staff

- 33.1.1 All staff members will undertake safeguarding and child protection procedures training at induction, including whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners. The training must include an understanding of the expectations for online safety, roles and responsibilities around filtering and monitoring.
- 33.1.2 All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. This training will be refreshed annually via the Home Office online course.
- 33.1.3 Staff will also receive regular safeguarding and child protection updates, including online safety as required, but at least annually.
- 33.1.4 Volunteers will receive appropriate training, if applicable.
- 33.1.5 All staff are to receive annual and ongoing contextualised safeguarding training, which includes specific safeguarding issues such as neglect, domestic abuse, and the impact of parental mental ill health.
- 33.1.6 All staff are aware a child may not be ready to disclose concerns. Staff should maintain professional curiosity and report to the DSL.

#### 33.2 The Designated Safeguarding Lead (DSL) and Deputy DSL(s)

- 33.2.1 The DSL will undertake child protection and safeguarding training at least every 2 years.
- 33.2.2 They will also undertake Prevent awareness training annually.

#### 33.3 Recruitment - interview panels

33.3.1 Please refer to the school's Safer Recruitment policy.

#### 34. Restrictive Physical Intervention

- 34.1 Restraint may be necessary to safeguard the individual and/or others from serious injury or harm, and sometimes it will be the only realistic option, for example, to prevent a child from running into a busy road.
- 34.2 We aim to promote a positive and proactive approach to behaviour, including de-escalation techniques appropriate to the child or young person, to minimise the likelihood of or avoid the need to use restraint.
- 34.3 The use of restraint is based on an assessment of risk and to safeguard the individual or others.
- 34.4 Restraint should only be used where it is necessary to prevent the risk of serious harm, including injury to the child or young person.

## 35. Artificial intelligence (AI)

- 36. 1 Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.
- 36.2 The school recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.
- 36.3 Staff will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy. Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

## 36. Monitoring arrangements

36.1 This policy will be reviewed **annually** by the School Improvement Committee. At every review, it will be approved by the committee.

## 37. Links with other policies

- 37.1 This policy links to the following policies and procedures:
  - a) Behaviour Policy
  - b) Staff Code of Conduct Whistle-blowing
  - c) Complaints
  - d) Health and Safety
  - e) Online Safety

- f) Equality
- g) SEN policy
- h) First aid
- i) Curriculum
- j) Privacy notices
- k) Safer Recruitment
- I) GDPR, Data protection

# **Appendices**

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education & working together to safeguard children.

# Appendix 1: types of abuse

- 1. **Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.
- 2. **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces, illness in a child.
- 3. **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun of what they say or how they communicate
- Age or developmentally inappropriate expectations are 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- 4. **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:
  - Physical contact, including assault by penetration (for example rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing
  - Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- 5. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- 6. **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.
- 7. 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 caregivers)
  - Ensure access to appropriate medical care or treatment
- 8. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 9. Up skirting as defined by the "The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Up skirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender can be a victim." (Keeping Children Safe in Education Sept 2020).
- 10. Fabricated-induced illness (FII) is a form of child abuse, It occurs when a parent or carer, usually the child's biological mother exaggerates or deliberately causes symptoms of illness in the child. FII is also known as Munchausen's syndrome by proxy. FII is a child protection issue and cannot be treated by the NHS alone. Therefore, if staff suspect FII they must follow their Academies safeguarding procedures by reporting concerns through the safeguarding electronic system and informing the DSL immediately, the DSL will refer the concerns to the Children and Families direct (Social Care). If you suspect that someone you know may be fabricating or inducing illness in their child, it is not recommended that you confront them directly. A direct confrontation is unlikely to make a person admit to wrongdoing, and it may allow them to dispose of any evidence of abuse.

# **Appendix 2: Specific Safeguarding Issues**

Some children and young people may be particularly vulnerable to abuse and harm. The designated safeguarding lead should be aware of the range of guidance that is available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local (Safeguarding Partnership) procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm. It must be noted some of the texts are directly taken from Keeping Children Safe in Education 2022.

## **Child Sexual Exploitation**

The statutory definition of Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.' (Department for Education, 2012).

Child sexual exploitation is a form of abuse that involves children (male and female, of different ethnic origins and different ages) receiving something in exchange for sexual activity. Schools are well placed to prevent, identify and respond to children at risk of sexual exploitation.

### Who is at risk?

- Child sexual exploitation can happen to any young person from any background. Although
  the research suggests that females are more vulnerable to CSE, boys and young men are
  also victims of this type of abuse.
- The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people.
- In all its forms, CSE is child abuse and should be treated as a child safeguarding issue.

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

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

- in exchange for something the victim needs or wants, and/or
- for the financial or other advantage of the perpetrator or facilitator and/or
- through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. It may, or may not, be accompanied by violence or threats of violence. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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

## **County Lines**

Criminal exploitation of children (CEC) is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

When children are not attending school, the risk that they could be exploited either criminally and/or sexually is heightened. In line with the Local Authority procedures, a CME (child missing in education) referral will be made. When the child returns to school, teachers and staff must be aware of the signs and symptoms of trauma and refer any concerns swiftly.

### Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/993172/Modern\_Slavery\_Statutory\_Guidance\_\_EW\_\_Non-Statutory\_Guidance\_\_SNI\_\_v2.3.pdf

## Honour-Based Abuse including Forced Marriage

Honour Based Abuse is a cultural, not a religious phenomenon. It impacts a range of communities. The challenges for services include developing responses that keep people safe and hold perpetrators to account without stereotyping, stigmatising, or making assumptions about any given individual or community.

Honour Based Abuse, which may include forced marriage and/or female genital mutilation, is perpetrated against children and young people for several reasons. These include:

- Protecting family 'honour' or 'Izzat'
- To control unwanted behaviour and sexuality (including perceived promiscuity or being lesbian, gay, bisexual or transgender)
- As a response to family, community, or peer group pressure
- Strengthening family links
- Protecting perceived cultural and/or religious ideals (misguided or dated)
- Retaining wealth, property, or land within the family
- Preventing unsuitable relationships
- Assisting claims for residence and citizenship in the UK
- Perceived immoral behaviour
- Inappropriate make-up or dress
- Possession and/or use of a mobile telephone
- Kissing or showing other forms of intimacy in public
- Rejecting a forced marriage
- Being a victim of rape or other serious sexual assault
- Inter-faith relationships
- · Seeking a divorce.

## **Forced Marriage**

'A forced marriage is a marriage in which one or both spouses do not (or, in the case of children and some adults at risk, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual, and emotional pressure.'

### Scottish Government

"A marriage conducted without the valid consent of both parties where duress is a factor." A Choice by Right (June 2000)

Forced Marriage (Civil Protection) Act 2007 (England/Wales)

- Courts have the power to make Forced Marriage Protection Orders.
- Breach of an injunction would not itself be a criminal offence but would be a contempt of court. Courts would have the full range of sanctions available to them, including imprisonment.
- Enables third parties to apply for an injunction on behalf of somebody

There will be a maximum penalty of seven years for committing a forced marriage offence and a maximum penalty of five years for breach of a forced marriage protection order.

Staff must report concerns regarding forced marriage to the DSL immediately to ensure safeguarding procedures can be implemented, the DSL will inform the Headteacher, Children and Families social care and the police.

## **Private Fostering**

A private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before A private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not doing so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools must inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself must inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

## **Preventing Radicalisation**

Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counterterrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all academies.

Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk and that staff are appropriately trained to look out for signs of radicalisation and are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programmes to challenge extremist ideology. The guidance on this has not yet been published but we will be sharing this as soon as possible as well as keeping you informed on how we are coordinating this in a partnership approach.

To minimise the risk, staff will lookout for early signs of radicalisation/extremism, such as pupils;

- showing sympathy for extremist causes
- glorifying or advocating violence, especially to other faiths or cultures
- intolerance of difference, including faith, culture, gender, race, or sexuality

### Child-on-child abuse

The school promotes positive relationships between peers, and encourages children who feel uncomfortable, threatened or at risk, to speak out.

Allegations are managed by senior staff who deal with each matter on a case-by-case basis and investigate thoroughly with the children involved, making appropriate referrals to outside agencies where (such as police or social care). Incidents are recorded using the electronic safeguarding system as appropriate and risk assessments are undertaken.

School ensures that parents and carers are aware of disclosures or allegations of abuse and aim to work together towards a resolution securing ways in which to move forward.

The school will support the victim, perpetrator and/or the family/carers involved in an incident of child-on-child abuse and take into account the context of the concern.

Lady Jane Grey has a zero-tolerance approach to Child-on-child abuse.

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element that facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element that facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- We are aware that consensual and non-consensual sharing of images of nudes (known as sexting) is part of child abuse and will be dealt with accordingly
- Up skirting 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 to cause the victim humiliation, distress, or alarm
- 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)

Where children abuse their peers online, this can take the form of, for example, 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 don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a disclosure to them, report immediately to the DSL.

The school supports children to understand the law, this could include direct/indirect work from/with the Police Intervention Officer.

### Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face-to-face (both physically and verbally)
- Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, staff must make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating

a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to DSL immediately.

## Serious violence

Indicators that may signal that a child is at risk from, or involved with serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- •
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)

For further information please go to the Home Office's <u>Preventing youth violence and gang involvement</u> and its <u>Criminal exploitation of children and vulnerable adults: county lines</u> guidance

Risk factors that increase the likelihood of involvement in serious violence include:

- · Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

### Children who self-harm

Staff **must** always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary-age child has self-harmed serious consideration must be given to whether there are other underlying factors, including abuse.

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological, or emotional. It can also include ill-treatment that isn't physical, as well as witnessing the ill-treatment of others – for example, the impact of all forms of domestic abuse on children. including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development, and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day – part of Operation Encompass (see section 80).

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic

incident, the police will inform the designated safeguarding lead in school before the child or children arrive at school the following day.

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

The DSL will provide support according to the child's needs and update records about their circumstances.

### Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL will be aware of contact details and referral routes to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and following local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

## Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents:

### a. Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

 Contacted by an online account that they do not know but appears to be another child or young person

- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- · Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

### b. Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including Al-generated images, of the child or young person
- The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.
- Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:
- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts

• Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

# **Appendix 3: Information and Support**

There is a wealth of information available to support schools, colleges, and parents/carers to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

- · Childnet provides guidance for schools on cyberbullying
- Educateagainsthate provides practical advice and support on protecting children from extremism and radicalisation
- London Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
- NSPCC provides advice on all aspects of a school or college's online safety arrangements
- Safer recruitment consortium "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective
- Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones
- South West Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
- Use of social media for online radicalisation A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided advice on sexting-in-schools-and-colleges and using external-visitors-to-support-online-safety-education
- · Remote education, virtual lessons, and live streaming
- Case studies on remote education practice are available for schools to learn from each other
- Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely
- London Grid for Learning guidance, including platform-specific advice
- National cybersecurity centre guidance on choosing, configuring, and deploying video conferencing
- National cybersecurity centre guidance on how to set up and use video conferencing 23
- UK Safer Internet Centre guidance on safe remote learning

## Support for children

- Childline for free and confidential advice
- UK Safer Internet Centre to report and remove harmful online content
- CEOP for advice on making a report about online abuse

## **Parent Support:**

- Child net offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- Commonsense media provide independent reviews, age ratings, & other information about all types of media for children and their parent/carers
- Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- Government advice about security and privacy settings, blocking unsuitable content, and parental controls
- Internet Matters provide age-specific online safety checklists, guides on how to set parental
  controls on a range of devices, and a host of practical tips to help children get the most out
  of their digital world
- Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation
- London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary-aged children safe online
- Lucy Faithfull Foundation StopltNow resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- National Crime Agency/CEOP Thinkuknow provides support for parents and carers to keep their children safe online
- Net-aware provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps, and games
- Parentzone provides help for parents and carers and UK Safer Internet Centre provide tips, advice, guides, and other resources to help keep children safe online.
- Parent info from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations

# Appendix 4 – Role of the Lead Designated Safeguarding Lead and Deputy Designated Safeguarding Lead

## Role of the Designated Safeguarding Lead

The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). **The DSL must be a member of the senior leadership team.** 

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.

The designated safeguarding lead should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

The DSL should understand when they should consider calling the Police and what to expect when they do.

During term time, the DSL should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns.

The DSL should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training as set out above, their knowledge and skills should be updated (for example via ebulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

## **Deputy Designated Safeguarding Leads**

The Deputy Designated Safeguarding Leads should be trained to the same standard as the Designated Safeguarding Lead and the role should be explicit in their job description. The deputy (or multiple deputies) must be able to perform the role of the DSL in the absence of the DSL.

The job descriptions are as follows for both DSL and DDSL.

## Job description Designated Safeguarding Lead

### **JOB DESCRIPTION**

JOB TITLE: Designated Safeguarding Lead (DSL)

**LOCATION:** Based at the school

**REPORTING TO:** Headteacher/School Improvement Committee

**CONTRACT:** Permanent. Full time.

The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL will have a leadership position in the School. They will be given the time, funding, training, resources, and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

### **Key Accountabilities:**

### Manage referrals

The Designated Safeguarding Lead will:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and to the local authority's designated officer;
- Refer cases where a crime may have been committed to the Police.

### Work with others

The Designated Safeguarding Lead will:

- Liaise with the Headteacher to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations;
- As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- Liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice and expertise for all staff.
- Link closely with the three local safeguarding partners.

### **Training**

The Designated Safeguarding Lead will 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 Designated Safeguarding Lead will undertake Prevent awareness training.

The DSL will keep up-to-date with latest information about safeguarding so that their knowledge and skills are refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments).

### The DSL will:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- 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 and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the school child protection policy and procedures, especially new and part time staff
- be alert to the specific needs of children in need, those with special educational needs and young carers
- · are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that
  they have the relevant knowledge and up to date capability required to keep children safe
  whilst they are online
- have an overview of the filtering arrangements across the school and be responsible for the monitoring arrangements for online safety.
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
- Ensure the academic/pastoral progress of all children who need a social worker by ensuring regular reviews of their holistic progress

### **Raise Awareness**

The Designated Safeguarding Lead will:

- ensure the school child protection policy is known, understood and used appropriately and is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly.
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school.
- link with the Local Safeguarding Partners to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- provide appropriate reports and information to the School Improvement Committee

### Child Protection File

The DSL, where children leave the school, will ensure their child protection file is transferred to the new school or college within 5 days. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained (if CPOMS is not the tool for transfer). Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEND in colleges, are aware 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. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

### Availability

During term time the Designated Safeguarding Lead should always be available (during school hours) for staff in the school to discuss any safeguarding concerns.

## **Job Description Deputy Designated Safeguarding Lead:**

### JOB DESCRIPTION

JOB TITLE: Deputy Designated Safeguarding Lead (DDSL)

**LOCATION:** Based at the school

**REPORTING TO:** The DSL and the Headteacher

The Deputy Designated Safeguarding Lead will support the DSL to safeguard and protect children (including online safety). The DDSL will be given the time, funding, training, resources, and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

### **Key Accountabilities:**

### Manage referrals

The deputy designated safeguarding lead will when the DSL is unavailable or out of the school:

- refer cases of suspected abuse to the local authority children's social care as required
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and to the local authority's designated officer;
- refer cases where a crime may have been committed to the Police.

### Work with others

The deputy designated safeguarding lead will support the DSL to:

- liaise with the Headteacher to inform her/him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice, and expertise for all staff.

### **Training**

The deputy designated safeguarding lead will 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 deputy designated safeguarding lead will undertake Prevent awareness training.

The DDSL will keep up-to-date with latest information about safeguarding so that their knowledge and skills are refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments).

### The DDSL will:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- 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 and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff
- are alert to the specific needs of children in need, those with special educational needs and young carers
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that
  they have the relevant knowledge and up to date capability required to keep children safe
  whilst they are online
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online

- obtain access to resources and attend any relevant or refresher training courses; and
- 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.

## **Availability**

During term time the DDSL will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. The DDSL will assume responsibility for safeguarding in the school when the DSL is absent.

# **Appendix 5: Online Safeguarding/Filtering and Reporting**

Online safety – We recognise that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse online as well as face to face. Some children may use mobile and smart technology, whilst at school and outside of school, to sexually harass their peers, share indecent images (consensually and non-consensually) and view and share pornography and other harmful content. Many children have unrestricted access to the internet via their mobile phones and our online safety policy describes the rules governing their use in school. It also sets out the school's response to incidents which may involve one or more of the four areas of risk – content, contact, conduct and commerce.

Online safety is a consideration running through the planning and implementation of all relevant policies and procedures. Different staff and governors (e.g. the Designated Safeguarding Lead, SLT, IT Provider/Manager, and all other staff) understand and receive relevant training about their assigned roles and responsibilities in filtering and monitoring the internet in school; e.g. about understanding the systems and processes in place, reviewing internet logs, checking and reviewing its effectiveness, knowing how to record and report concerns etc.

Staff will always respond if informed that children have been involved in sharing indecent images. The DfE guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (Dec 2020) will be used to guide the school's response on a case by case basis.

The key points for staff and volunteers (not including the DSL) being:

- Report immediately to the DSL
- Do not view, copy, print, share, store or save the imagery, or ask a child to share or download.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it. Leave this for the DSL
- if needed
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).

Lady Jane Grey uses Fortinet Firewall and Netsweeper filtering and reporting system.