



Budmouth College

Safeguarding Policy and Child Protection Procedures

Governors' Committee responsible:	The Curriculum and Student Welfare committee
Link Senior Leader responsible:	Zillah Rainback
Adopted	October 2016
Date reviewed by Governors :	November 2017
Next annual review date:	November 2018

This Policy should be read in conjunction with the following Budmouth College policies and documents which can be found on the R Drive, FROG or the College Website and are available from the College Office:

Policies	Documents
Trips and Visits	August 2016 guidance from UKCCIS: 'Sexting in schools and colleges: responding to incidents and safeguarding young people'
Attendance and Lateness	Guidance on Using Volunteers
Intimate Care	Female Genital Mutilation Guidance
First Aid	Forced Marriage and Honour Based Violence Briefing 2014
Supporting Children with Medical Conditions and Managing Medicines	DSCB Escalation Policy
Code of Conduct and Guidelines for Safer Working Practices for the Protection of Children and Staff	The Protection of Children Act 1978 (England and Wales)
Alcohol and Substance Misuse	Sexual Offences Act 2003 (England and Wales)
Drugs	The Children Act 1989
Searching and Confiscation	Working Together 2015
Sexual Health	Keeping Children Safe in Education 2016
Code of Conduct including Anti-Bullying	Malicious Communications Act 1988
Use of Reasonable Force	Communications Act 2003
Dealing with Allegations of Abuse Against Members of Staff and Volunteers, including referring to the Disclosure and Barring Service (when appropriate)	DFE Searching Screening and Confiscation advice
Confidentiality	
Whistle Blowing	
Getting Changed for Sport	
Getting Changed for Dance and Drama	
Visitors to College	
E-Safety	
Use of Social Media	
Recruitment and Selection	

The Policy has been reviewed using the equality impact assessment initial screening record and positive impact is explicitly intended and very likely.

All *policies* can be found on the College 'R' drive in the Policies folder.

Equality Impact Assessment – initial screening record

1. What area of work is being considered?

Safeguarding and Child Protection Procedures

2. Upon whom will this impact?

All members of staff
All students
All visitors

3. How would the work impact upon groups; are they included and considered?

The Equality Strands	Negative impact	Positive impact	No impact
Minority ethnic groups		y	
Gender		y	
Disability		y	
Religion, Faith or belief		y	
Sexual Orientation		y	
Transgender		y	
Age (N/A to pre-school and school children)		y	
Rurality		y	

4. Does data inform this work, research and/or consultation, and has it been broken down by the equality strands?

	NO	YES	Uncertain
Minority ethnic groups		y	
Gender		y	
Disability		y	
Religion, Faith or belief		y	
Sexual Orientation		y	
Transgender		y	
Age		y	
Rurality			y

Does the initial screening highlight potential issues that may be illegal? NO

Further comments:-

Do you consider that a full Equality Impact Assessment is required? YES

Initial screening carried out by Zillah Rainback

SignedZillah Rainback..... Date 12/10/17

Comment by Principal :

Date.....

Safeguarding Policy and Child Protection Procedures

The Safeguarding and Child Protection Procedures for Budmouth College are based on a template provided by the Dorset Safeguarding and Standards Team; it reflects the Pan-Dorset Inter-Agency Safeguarding Procedures (on the Dorset Safeguarding Children Board website) and 'Keeping Children Safe in Education' 2016.

This policy consists of three main documents:

- A. The overarching Safeguarding Policy (statement of principles)
- B. Detailed child protection procedures and
- C. Child protection summary sheet. The latter is printed separately and provided routinely for those adults who will not have the opportunity to read this policy in its entirety but will have unsupervised contact, even as a 'one-off', with students on a temporary or intermittent basis such as supply, peripatetic or visiting professionals.

A. Safeguarding Policy

Budmouth College recognise(s) that the welfare of the child is paramount: the needs and wishes of each child will be put first. Throughout this document, 'child' refers to a young person under the age of 18.

We take seriously our duty to safeguard and promote the welfare of the children and young people in our care.

Safeguarding children is everyone's responsibility. 'Working Together to Safeguard Children' 2015, HM Government statutory guidance, defines safeguarding as:

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

The Governing Body will act in accordance with Section 175 / Section 157 of the Education Act 2002 and the supporting statutory guidance 'Keeping Children Safe in Education' 2016 to safeguard and promote the welfare of children in this school.

The Governing Body is accountable for ensuring that the College meets its statutory responsibilities for safeguarding and that all policies, procedures and training are in place and effective.

It is a Dorset Safeguarding Standard (recommended by the Dorset Safeguarding Children Board) that Governors receive an annual report from the Designated Safeguarding Lead and Nominated Governor in order to help monitor compliance with statutory responsibilities.

The Dorset Standards also include that each school and college completes and submits to the Safeguarding Children Board an annual audit of its safeguarding and child protection arrangements, including an action plan.

All children have the right to be safeguarded from harm or exploitation whatever their

- age
- health or disability
- gender or sexual orientation
- race, religion, belief or first language
- political or immigration status

Governors, staff and regular volunteers in this College understand the importance of taking appropriate action and working in partnership with children, their parents/carers and other agencies in order to safeguard children and promote their welfare.

The purpose of this policy is to:

- afford protection for all students
- enable staff and volunteers to safeguard and promote the welfare of children
- promote a culture which makes this College a safe place to learn and in which children feel safe

This policy applies to the Principal, all staff, including supply and peripatetic staff, regular volunteers (i.e. those who come into College once a week or more or 4 times in a 30 day period), Governors or anyone working on behalf of the College.

We will endeavour to safeguard children and young people by:

- always acting in their best interests
- valuing them, listening to and respecting them
- involving them in decisions which affect them
- never tolerating bullying, homophobic behaviour, racism, sexism or any other forms of discrimination, including through use of technology
- ensuring the curriculum affords a range of opportunities to learn about keeping themselves safe, particularly when using technology
- exercising our duties under the Counter-Terrorism and Security Act 2015 by ensuring all staff attend 'Prevent' training in respect of radicalisation and extremist behaviour and by assessing the risk of our students being drawn into terrorism
- supporting attendance and taking action if a child is missing College regularly
- ensuring the Designated Safeguarding Lead (DSL) is part of the Leadership Team and ensuring this person has the time, funding, training, resources and support to perform the role effectively
- ensuring there is at least one Deputy Designated Safeguarding Lead to ensure there is always someone available during College hours for staff to discuss any safeguarding concerns
- appointing a Designated Teacher to promote the educational achievement of children who are Looked-After (in care) and to work closely with the Virtual School Head to discuss how Pupil Premium plus additional funding can support the progress of these children
- ensuring that staff working with Looked-After Children have information appropriate to their role regarding, for example, the child's care arrangements, legal status and contact with birth parents
- making sure all staff and volunteers are aware of and committed to the Safeguarding Policy and Child Protection Procedures and also understand their individual responsibility to take action
- ensuring that all those named above (i.e. DSLs and Deputy DSLs; Designated Teacher; Principal, all staff and regular volunteers) have training appropriate to their roles as set out in statutory guidance or recommended by the Dorset Safeguarding Children Board
- identifying any concerns early and providing appropriate help to prevent them from escalating, including working with parents/carers and other agencies as appropriate. Budmouth College employs a Parent Support Worker, an ELSA, College Counsellors and uses the Common Assessment Framework as required. Budmouth College also has the Zone lunchtime drop-in that a PCSO, School Nurse and 2 Youth Workers attend. We also work closely with the assigned Youth Worker on early help projects. For example working with small groups of students on resilience or 1:1 work on specific issues.
- sharing information about child safeguarding concerns with agencies who need to know, and involving children and their parents/carers appropriately
- acknowledging and actively promoting that multi-agency working is the best way to promote the welfare of children and protect them from harm, for example through the Team Around the School Meetings
- taking the right action, in accordance with Dorset Safeguarding Children Board inter-agency safeguarding procedures, if a child discloses or there are indicators of abuse
- keeping clear, accurate and contemporaneous safeguarding and child protection records
- recruiting staff and volunteers (including host families) safely, ensuring all necessary checks are made in accordance with statutory guidance and legal requirements and also making sure that at least one appointment panel member has undertaken safer recruitment training (*mandatory in maintained schools; best practice in others*)
- providing effective management for staff through induction, support and regular update training appropriate to role
- adopting a code of conduct for all staff and volunteers which includes acceptable use of technologies, staff/student relationships and communications including the use of social media
- ensuring our online safety process includes appropriate filters and monitoring systems
- ensuring staff and volunteers understand about 'whistle blowing' and how to escalate concerns about students or staff if they think the right action has not been taken to safeguard children
- promoting a culture in which staff feeling able to report to senior leaders what they consider to be unacceptable behaviour or breaches of the College Code of Conduct by their colleagues, having faith that they will be listened to and appropriate action taken
- dealing appropriately with any allegations/concerns about the behaviour of staff or volunteers in accordance with the process set out in statutory guidance

These policies and procedures can be found on Frog, the R/Drive, on College website and available from College office.

B. Child Protection Procedures

These procedures should be read in conjunction with 'Keeping Children Safe in Education, Part One: Information for all School and College Staff' 2016, plus Annex A.

1. What is Child Protection?

1.1 Child protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

2. What is significant harm?

2.1 The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and in each case require discussion with the statutory agencies: Children's Social Care and Police.

3. Purpose of these procedures

3.1 These procedures explain what action should be taken if there are concerns that a child is or might be suffering harm. A 'child' is a person under 18 years but the principles of these procedures apply to all pupils at this school, including those over 18.

4. Responsibilities and roles

4.1 All adults in the College have an individual responsibility to safeguard and promote the welfare of children by taking appropriate action. This includes taking action where there are child protection concerns.

4.2 The Governing Body is accountable for ensuring the College has an effective Safeguarding Policy and Child Protection Procedures which should be reviewed annually and available publicly, such as on the College website.

4.3 The statutory safeguarding guidance for schools: 'Keeping Children Safe in Education' states that all schools and colleges should have 'a senior board level lead to take leadership responsibility' for safeguarding.

The person who takes leadership responsibility for safeguarding on the Governing Body of this College is Sue Prescott.

4.4 This College has a Designated Safeguarding Lead (DSL). This is the person who takes lead responsibility for safeguarding. Any concerns about children should be discussed with/reported to the DSL who will decide what action to take including referring to Children's Social Care or Police as appropriate. More information about the DSL role can be found in Annex B of Keeping Children Safe in Education 2016.

The Designated Safeguarding Lead in this College is Zillah Rainback. The Deputy Safeguarding Lead is Lucy Vincent.

4.5 In addition, Dorset Children's Social Care can provide advice and guidance on safeguarding and child protection matters.

See Appendix 1 for contact details.

4.6 All action is taken in line with the following guidance:

- DfE guidance (2016) – Keeping Children Safe in Education
- Working Together to Safeguard Children (2015) – published by HM Government
- Bournemouth, Dorset and Poole Inter-Agency Safeguarding Procedures & Guidance, accessed through the Dorset Safeguarding Children Board website www.dorsetlscb.co.uk
- What to do if you're worried a child is being abused – Government Guidance (2015)

5. What is child abuse?

5.1 It is generally accepted that there are four main forms of abuse. The following definitions are from Working Together to Safeguard Children (2015).

i) **Physical abuse**

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

ii) **Emotional abuse**

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

iii) **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 non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

iv) **Neglect**

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance use. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

5.2 It is accepted that in all forms of abuse there are elements of emotional abuse, and that some children are subjected to more than one form of abuse at any one time. In most cases multiple issues will overlap with one another.

6. Recognising child abuse – signs and symptoms

6.1 Keeping Children Safe in Education is clear: 'All school and college staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection'.

6.2 Recognising child abuse is not always easy, and it is not the responsibility of College staff to decide whether or not child abuse has definitely taken place or if a child is at significant risk. They do, however, have a clear individual responsibility to act if they have a concern about a child's welfare or safety or if a child talks about (discloses) abuse. They should maintain an attitude of 'it could happen here' and always act in the best interests of the child.

Appendix 2 details examples of possible indicators of each of the four kinds of abuse.

7. Allegations made by children about other children, including peer on peer abuse

7.1 If one student causes harm to another, it is not always necessary for it to be dealt with through a referral to Children's Social Care: sexual experimentation within 'normal parameters', bullying and fighting, for example, are not generally seen as child protection issues. All incidents will, however, be taken seriously, parents/carers will be contacted and appropriate action taken. See the Code of Conduct for further guidance.

7.2 The nature and severity of the allegation or concern will determine whether staff will implement the College's Anti-Bullying Policy in the Code of Conduct or other College procedures or whether a referral needs to be made to Social Workers or the Police. The Designated Safeguarding Lead should be consulted if there is any doubt about the right course of action.

- 7.3 A referral to Children's Social Care will be made in all cases of domestic abuse relating to young people aged 16 and 17 who experience physical, emotional, sexual and/or financial abuse, or coercive control, in their intimate relationships.
- 7.4 A referral to Children's Social Care will be made if a child or young person displays sexually harmful behaviour. This involves one or more children engaging in sexual discussions or acts that are inappropriate for their age or stage of development. It is also considered harmful if it involves coercion or threats of violence or if one of the children is much older than the other.
- 7.5 The process for managing sexually harmful behaviour can be found in the inter-agency safeguarding procedures on the DSCB website. In brief, a multi-agency meeting should be convened by Children's Social Care following a referral and an action plan agreed.
- 7.6 A College Risk Assessment will be put in place, preferably by way of a meeting, which includes parents/carers and other professionals where they are involved.
- 7.7 Staff should not dismiss abusive behaviour as 'normal' between young people and should not develop high thresholds before taking action.
- 7.8 Staff should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.
- 7.9 Youth produced sexual imagery (was referred to as sexting) involves:
- still images or videos which are of a sexual nature, generated by children under the age of 18 or of children under the age of 18, shared via a mobile phone, handheld device or website.
 - A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
 - A person under the age of 18 is in the possession of sexual imagery created by another person under the age of 18.
 - For further details of this please see Sexting in Schools and Colleges, responding to incidents and safeguarding young people (UKCCIS) in Section 1 pages 5 and 6.

The Law

- Young people who share sexual imagery of themselves, or peers are breaking the law. For further details of this please see Sexting in Schools and Colleges, responding to incidents and safeguarding young people (UKCCIS) which covers specific information regarding the law and the term "indecent" in Section 1 pages 7 and 8.

The Police Response

- The National Police Chiefs (NPCC) has made it clear that incidents involving youth produced sexual imagery should primarily be treated as safeguarding issues.
- The College may respond to incidents without involving the police. However the police may need to be involved in cases to ensure thorough investigation including collection of all evidence (for example multi-agency checks), and there are certain incidents that should always be reported to the police.
- Even when the police are involved, however, a criminal justice response and formal sanction against young people would only be considered proportionate in certain circumstances.

Crime Recording

- Where police are notified of incidents of youth produced sexual imagery they are obliged, under the Home Office Counting Rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a "crime" and the young person involved will be listed as a "suspect." This is not the same as having a criminal record.

Outcome 21

- To avoid this having a negative effect on young people (e.g. Disclosure on an enhanced Disclosure and Barring Service (DBS) check) the police are permitted to record Outcome 21:

Further investigation resulting from the crime report, which could provide evidence sufficient to support formal action being taken against the suspect, is not in the public interest. This is a police decision.

For further information regarding this please see UKCCIS Sexting in schools and colleges: responding to incidents and safeguarding young people 2016 Section 1, page 9.

Handling Incidents

Initial response

When an incident involving youth produced sexual imagery comes to the College's attention:

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

Disclosure

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, the DSL in College, or any member of the College staff. They may report through an existing reporting structure, or a friend or parent may inform someone in College, or inform the police directly.

All members of staff (including non-teaching) should be made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery. This should be covered within staff training and they should be made aware of the Safeguarding Policy and Child Protection Procedures.

Any direct disclosure by a young person should be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in College is a last resort and they may have already tried to resolve the issue themselves.

Initial review meeting

The initial review meeting should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or Children's Social Care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved - in most cases parents should be involved

An immediate referral to police and/or children's social care should be made if at this initial stage:

1. The incident involves an adult
2. 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)
3. What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The imagery involves sexual acts and any student in the imagery is under 13
5. You have reason to believe a student is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above applies, then the College may decide to respond to the incident without involving the police or Children's Social Care (the College can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or Children's Social Care would be made in cases when the DSL is confident that they have enough information to assess the risks to students involved and the risks can be managed within the College's pastoral support and disciplinary framework and if appropriate local network of support.

The decision should be made by the DSL with input from the Principal and input from other members of staff if appropriate. The decision should be recorded in on MyConcern.

The decision should be in line with the College's Safeguarding Policy and Child Protection Procedures and should be based on consideration of the best interests of the young people involved. This should take into account proportionality as well as the welfare and protection of the young people. The decision should be reviewed throughout the process of responding to the incident.

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the College to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to Police and/or Children's Social Care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or Children's Social Care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks the following should be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the student in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the students involved?
- Do the students involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents. Annex A provides a list of questions to complement and support their professional judgment.

Informing parents/carers

Parents/carers should be informed and involved in the process at an early stage unless informing the parent/carer will put the young person at risk of harm. Any decision not to inform the parents/carers would generally be made in conjunction with other services such as Children's Social Care and/or the police, who would take the lead in deciding when the parents/carers should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases DSLs may work to support the young people to inform their parents themselves.

Annex C contains further advice and information about involving parents and carers.

Reporting incidents to the police

If it is necessary to refer to the police, contact should be made through existing arrangements. This may be through a Safer Schools Officer, a PCSO (Police Community Security Officer), local neighbourhood police or by dialling 101.

Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

Things to be aware of when making reports to the police:

- Be aware that the police are not able to offer general advice on incidents. If the children involved are named or specifics are provided they are duty-bound to record and investigate all criminal activity reported.

- When making a report through the 101 service, be aware that the person answering the call is a call handler who deals with a wide variety of crimes and may not have specialist knowledge in this area. Ensure any crime reference numbers provided are recorded.
- Safer Schools Officers (where available) are able to offer direct support to schools on prevention and advice on management of incidents.
- All incidents involving youth produced sexual imagery should be responded to in line with the Safeguarding Policy and Child Protection Procedures.

Securing and handing over devices to the police

If any devices need to be seized and passed over to the police then the device(s) should be confiscated and the police should be called. The device should be turned off and placed under lock and key until the police are able to come in and retrieve it.

Children's Social Care contact and referrals

If the DSL is aware that Children's Social Care are currently involved with a young person involved in an incident of youth produced sexual imagery then they should contact Children's Social Care. They should also contact Children's Social Care if they believe they may be involved, or have been involved with a young person in the past.

If as a result of the investigation the DSL believes there are wider issues which meet the threshold for Children's Social Care involvement then the DSL should make a referral in line with the College child protection procedures.

The DSL should ensure that he/she is aware of, and familiar with, any relevant local policies, procedures and contact points/names which are available to support the College in responding to youth produced sexual imagery. The Multi-Agency Safeguarding Hub (MASH) is the most appropriate place for the College to initially make a referral.

Searching devices, viewing and deleting imagery

Viewing the imagery

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

The decision to view imagery should be based on the professional judgement of the DSL and should always comply with the Safeguarding Policy and Child Protection Procedures. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the student.

If a decision is made to view imagery the DSL would need to be satisfied that viewing:
 is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
 is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
 is unavoidable because a student has presented an image directly to a staff member or the imagery has been found on a College device or network.

If it is necessary to view the imagery then the DSL should:

- Never copy, print or share the imagery, this is illegal.
- Discuss the decision with the Principal.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Principal.
- Ensure viewing takes place with another member of staff present in the room, ideally the Principal or a member of SLT. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on College premises, ideally in the Principal or a member of SLT's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery on Myconcern including who was present, why the image was viewed and any subsequent actions. Also record a paper copy and ensure that this is signed and dated and kept on the student's file.

Further details on searching, deleting and confiscating devices can be found in the DFE Searching Screening and Confiscation advice and the Searching and Confiscation Policy.

If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring College systems) then DSLs should ensure that the staff member is provided with appropriate support. Viewing youth produced sexual imagery can be distressing for both young people and adults and appropriate emotional support may be required.

Deletion of images

If the College has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of the imagery from devices and online services to limit any further sharing of the imagery.

The Searching, Screening and Confiscation advice highlights that the College has the power to search students for devices, search data on devices and delete youth produced sexual imagery.

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the Principal can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of College discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

However, just as in most circumstances it is not recommended that College staff view imagery, it is recommended that the College should not search through devices and delete imagery unless there is good and clear reason to do so.

It is recommended that in most cases young people are asked to delete imagery and to confirm that they have deleted the imagery. Young people should be given a deadline for deletion across all devices, online storage or social media sites.

Young people should be reminded that possession of youth produced sexual imagery is illegal. They should be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed unless this presents a further risk to the young person.

At this point the College may want to invoke our own disciplinary measures to discourage young people from sharing, creating or receiving images but this is at the discretion of Principal.

Interviewing and talking to the young person/people involved

Once the College has assessed a young person as not at immediate risk, it may be necessary to have a conversation with them and decide the best course of action. If possible, the DSL should carry out this conversation. However, if the young person feels more comfortable talking to a different teacher, this should be facilitated where possible.

When discussing the sharing of youth produced sexual imagery, it is important that the DSL:

- Recognises the pressures that young people can be under to take part in sharing such imagery and, if relevant, supports the young person's parents to understand the wider issues and motivations around this.
- Remains solution-focused and avoids questions such as 'why have you done this?' as this may prevent the young person from talking about what has happened.
- Reassures the young person that they are not alone and the College will do everything that they can to help and support them.
- Helps the young person to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the imagery.
- Discusses issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL if this ever happens.
- The purpose of the conversation is to:
 - ✓ Identify, **without looking**, what the image contains and whether anyone else has been involved.
 - ✓ Find out who has seen or shared the image and how further distribution can be prevented.

Recording incidents

- All incidents relating to youth produced sexual imagery need to be recorded on MyConcern. This includes incidents that have been referred to external agencies and those that have not.
- Ofsted highlight that when inspecting schools in relation to safeguarding they look for the following:
- Are records up to date and complete?
- Do records demonstrate both effective identification and management of the risk of harm?
- Do records demonstrate sound decision-making, appropriate responses to concerns and evidence of relevant referrals made in a timely manner?
- Do they indicate that appropriate action is taken in response to concerns and allegations in a timely manner?
- Do they show evidence of tenacity in following up concerns with relevant agencies?
- Do they provide evidence of effective partnership working and sharing of information?
- Is there evidence of attendance at or contribution to inter-agency meetings and conferences?
- Is there clarity about the College's Policy relating to the sharing of information internally, safe keeping of records, and transfer when a student leaves the College?
- In cases that relate to youth produced sexual imagery it is important that College reflect all of the areas above when they are recording incidents.
- In addition, where the College does not refer incidents out to police or Children's Social Care they should record their reason for doing so and ensure that this is signed off by the Principal.

Annex E contains further information about Ofsted's expectations in relation to youth produced sexual imagery.

Reporting youth produced sexual imagery online

Young people may need help and support with the removal of content (imagery and videos) from devices and social media, especially if they are distressed. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the young person.

Annex D outlines how to report to some of the major providers and what to do when a site does not have a reporting function.

Please see Annex G for a flow chart for responding to incidents.

Educating young people

This will be added as an appendix.

All youth produced sexual imagery concerns should be reported to the DSL's and dealt with as a safeguarding concern.

For further information regarding this please see UKCCIS Sexting in schools and colleges: responding to incidents and safeguarding young people 2016.

Peer on Peer Abuse

Please see the Code of Conduct including the Anti-Bullying Policy for further details on College procedures regarding Peer on Peer Abuse. Please refer to the Use of Social Media Policy and the E-Safety Policy for further details. Professional judgement should be used to decide if the issue is a behaviour issue or abuse. If there is any uncertainty the case should be discussed with the DSL who will advise on appropriate action.

In PSHE and Citizenship Lessons, students have lessons about bullying and E-Safety and other related issues.

Year 7

A focus on bullying, E-safety and building healthy relationships.

Year 8

Homophobic bullying and discrimination is tackled.

Years 9, 10 and 11

A focus on safe relationships, SRE and the impact of pornography

Teachers have INSET within Departmental Meetings to look at how to discuss sensitive and controversial topics, and are reminded of the protocol for disclosure. Teachers have had INSET 2016 on Challenging inappropriate language.

Within the Development Day programme, we have specialist agencies that come in and help us to deliver the topic of E-Safety and relationship Safety. We have Adam Rood delivering 'An Alphabet of a Teenager' and 'Safedate' coming in to talk to students about protecting themselves from vulnerable situations in relationships.

8. Students engaging in under-age sexual activity

8.1 Sexual activity where one of the partners is under the age of 16 is illegal, although prosecution of young people who are consenting partners of a similar age is not usual. The Designated Safeguarding Lead will exercise professional judgement when deciding whether to refer or take advice from social workers, taking into account such things as any imbalance of power, wide difference in ages or developmental stages etc.

8.2 Where a child is under the age of 13 penetrative sex is classified as rape under the Sexual Offences Act 2003 so must be reported to social workers in every case.

8.3 The inter-agency safeguarding procedures, on the DSCB website, have more information about under-age sexual activity.

9. Child sexual exploitation

9.1 This form of abuse involves exploitative situations, contexts and relationships where young people receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money, mobile phones) as a result of their performing, and/or another or others performing on them, sexual acts. It can occur through the use of technology without the child's immediate recognition; e.g. being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

9.2 Recognition of child sexual exploitation is part of staff training. We note that any child or young person may be at risk of this form of abuse, regardless of family background or other circumstances, and can experience significant harm to physical and mental health. *Staff can speak to the DSL regarding any concerns around this.*

9.3 Due to the grooming methods used by abusers, it is common for young people not to recognise they are being abused and may feel they are 'in a relationship' and acting voluntarily. Chelsea's Choice is offered to all students in Year 8 and they have the opportunity to discuss it.

9.4 Any concerns about child sexual exploitation will be discussed with the Designated Safeguarding Lead who will take appropriate action which might include completing a risk assessment form. The form and more detailed local procedures are in the inter-agency safeguarding procedures on the DSCB website.

10. Forms of abuse linked to culture, faith or belief

All staff in this College will promote mutual respect and tolerance of those with different faiths and beliefs. Some forms of abuse are linked to these and staff should strive to suspend professional disbelief (ie that they 'could not happen here') and to report promptly any concerns to the Designated Safeguarding Lead who will seek further advice from statutory agencies, prior to contacting parents/carers.

Female Genital Mutilation is illegal and involves intentionally altering or injuring female genital organs for non-medical reasons. It can have serious and long lasting implications for physical health and emotional well-being. Possible indicators include taking a girl out of College/country for a prolonged period or talk of a 'special procedure' or celebration. In addition to reporting any concerns to the Designated Safeguarding Lead, teachers (along with regulated health and social care professionals) have a statutory duty to report personally to the Police if they discover that female genital mutilation has or appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Please see FGM Guidance for more information.

Forced Marriage is also illegal and occurs where one or both people do not or, in cases of people with learning disabilities, cannot consent to the marriage and pressure or abuse is used. It is not the same as arranged marriage. Young people at risk of forced marriage might have their freedom unreasonably restricted or being 'monitored' by siblings. There might be a request for extended absence from College or might not return from a holiday abroad. We recognise that College staff can play an important role in safeguarding children from forced marriage. Please see Forced Marriage Guidance for more information.

So called 'honour-based' violence is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. It can exist in all communities and cultures and occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Females are predominantly, but not exclusively, the victims and the violence is often committed with some degree of approval and/or collusion from family or community members. All forms of so called honour-based violence are abuse, regardless of the motivation, and should be referred accordingly. Please see honour-based violence guidance for more information.

Radicalisation and extremism

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is defined by HM Government as ‘Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas’.

In this college we recognise that safeguarding against radicalisation and extremism is no different from safeguarding against any other vulnerability.

Our curriculum promotes respect, tolerance and diversity. Children are encouraged to share their views and to understand that they are entitled to have their own different beliefs which should not be used to influence others.

We recognise that children with low aspirations are more vulnerable to radicalisation and therefore we strive to equip our pupils with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

Children are taught about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the Internet.

Any concerns about students becoming radicalised or being drawn into extremism will be reported to the Designated Safeguarding Lead who will not speak to parents/carers or other family members at this stage but will take prompt advice from the Police by e-mailing the Safeguarding Referral Unit: sru@dorset.pnn.police.uk.

The Designated Safeguarding Lead is also the Prevent Lead.

Dorset has a Channel Panel in place, in accordance with its duties under the Counter-Terrorism and Security Act 2015. This is a multi-agency meeting which discusses individuals who have been referred by the Police as being vulnerable to being drawn into terrorism. Where pupils at this college are being discussed, the DSL or Principal will attend the Panel meetings.

Staff and Governors in this College have either attended a WRAP (Workshop to Raise Awareness of Prevent) session or have completed on-line Prevent training.

11. Children missing education

11.1 We recognise that a child going missing from education is a potential indicator of abuse and neglect, including the specific types of abuse detailed above and/or travelling to conflict zones.

11.2 Therefore all staff will follow the College’s procedure for dealing with unauthorised absence, particularly on repeat occasions, to help identify vulnerable students and to help prevent the risks of their going missing in future.

11.3 Actions could include involving other professionals and, if any of the criteria are met, informing the local authority where a student’s name has been removed from the College roll.

Please see the Attendance and Lateness Policy and the Code of Conduct for further information.

There is more information about specific safeguarding issues including links to websites in Part one and Annex A of ‘Keeping Children Safe in Education’ 2016.

12. Responding to the child who discloses (talks about) abuse

All staff and volunteers will:

- Listen carefully to what is said
- Avoid showing shock or disbelief
- Observe the child’s demeanour
- Find an appropriate opportunity to explain that the information will need to be shared with others. They will not promise to keep the information confidential or a ‘secret’
- Allow the child to continue at her/his own pace and not interrupt if the child is freely recalling events. They will not stop him/her in order to find a ‘witness’ as this could inhibit the child from saying more
- Avoid asking questions or pressing for more information. Ask for clarification only. If questions are necessary they should be framed an open manner and not ‘lead’ the child in any way: Tell me.... Explain.... Describe...
- Reassure the child, if necessary, that s/he has done the right thing in telling
- Explain what will happen next and with whom the information will be shared

- Not ask the child to repeat the disclosure to anyone else in school – including the DSL - or ask him/her or any other children who were present to write a written account or 'statement'

13. Taking action

- 13.1 Where physical injuries have been observed, these will be carefully noted but not photographed. The staff member will not ask to see injuries that are said to be on an intimate part of the child's body.
- 13.2 Any disclosure or indicators of abuse will be reported verbally to the DSL or Deputy straightaway or, where they are not available and concerns are immediate, ensure a referral is made without delay to MASH (Multi agency safeguarding hub) Children's Social Care.
(See Appendix 1 for contact numbers).
- 13.3 Where the child already has an allocated social worker, that person or the duty worker in the Local office team will be contacted promptly.
(See Appendix 1 for contact numbers).
- 13.4 A written record will then be made on the College 'Myconcern' form of what was said, including the child's own words, as soon as possible and sent to the DSL (this should be during the same working day).
- 13.5 If the child can understand the significance and consequences of making a referral to social workers, they will be asked for their views. It will be explained that whilst their views will be taken into account, the college has a responsibility to take whatever action is required to ensure the child's safety and that of other children.
- 13.6 The DSL will decide whether to contact parents at this stage, judging whether do so is likely to place the child at risk of harm from their actions or reactions - for example in circumstances where there are concerns that a serious crime such as sexual abuse, domestic violence or induced illness has taken place. If in any doubt, the DSL or staff member will call the duty worker first and agree with him/her when parents/carers should be contacted and by whom. The reason for the decision not to contact parents first will be recorded in the child's College child protection file.
- 13.7 A child protection referral from a professional cannot be treated as anonymous.
- 13.8 Where there is no disclosure by a child but concerns are accumulating, such as in relation to neglect or emotional abuse, the DSL will ensure that all information is brought together and that s/he makes a professional judgement about whether to refer to outside agencies.
- 13.9 The Dorset Safeguarding Children Board's 'Threshold Document' should be used to help clarify the pathway required for a child: whether concerns will be managed within the College; or with the help of other agencies as part of early help; or whether they require specialised support such as a social work assessment or referral to Child and Adolescent Mental Health Services (CAMHS).
- 13.10 A member of staff who reports concerns to the DSL should expect some feedback, although confidentiality might mean in some cases that this is not detailed. If the member of staff is not happy with the outcome s/he can press for reconsideration and if following this, s/he still believes the correct action has not been taken, will refer the concerns directly to social workers.

14. Responding to concerns reported by parents or others in the community

- 14.1 Occasionally parents or other people in the local community tell College Staff about an incident in or accumulation of concerns they have about the family life of a child who is also a student at the College.
- 14.2 If the incident or concern relates to *child protection*, the information cannot be ignored, even if there are suspicions about the motives of the person making the report. Members of staff will therefore pass the information to the DSL in the usual way.
- 14.3 It is preferable if the parent/community member who witnessed or knows about the concerns or incident makes a call to Children's Social Care themselves as they will be better able to answer any questions. They can ask for their name not to be divulged if a visit is made to the family. The DSL will advise accordingly and later confirm that this referral has been made.
- 14.4 If the parent/community member refuses to make the referral, the DSL will clarify that s/he (the DSL) has a responsibility to do so and will also need to pass on to social workers how s/he is aware of the information.
- 14.5 This process also applies to parents/community members who are also College staff. As professionals who work with children they cannot be anonymous when making the referral but can ask for the situation to be

managed sensitively and, if necessary, for their identity to be withheld from the family if it will cause difficulties in their private life.

15. Remember

- 15.1 Any suspicion or concern that a child or young person may be suffering or at risk of suffering significant harm, **MUST** be acted on. Doing nothing is not an option. Any suspicion or concerns will be reported without delay to the DSL or a Deputy, if for whatever reason they are not available, the staff member will discuss their concerns as soon as possible with either
- another senior member of staff or
 - MASH (Multi agency safeguarding hub)

Anyone can make a referral, not just the DSLs.

- 15.2 It is important that everyone in the College is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for making a judgement about whether or not abuse has occurred and should not conduct an 'investigation' to establish whether the child is telling the truth. That is a task for social workers and the Police following a referral to them of concern about a child. The role of College staff is to act promptly on the information received.

- 15.3 This applies regardless of the alleged 'perpetrator': whether the child raises concerns about a family member or someone outside College, a member of staff or another child/student.

- 15.4 A careful record will be made of what has been seen/heard that has led to the concerns and the date, time, location and people who were present. As far as possible, staff should record verbatim what was said and by whom. The record will be passed to the DSL.

- 15.5 The DSL will keep a record of the conversation with the duty worker and other social workers, noting what actions will be taken and by whom, giving the date and time of the referral. The referral will be confirmed in writing on the inter-agency referral form (available on the DSCB website) as soon as possible and at least within 48 hours. Any pre-existing assessments such as through the Common Assessment Framework should be attached.

- 15.6 A College child protection file (My concern) will be started in the child's name, where the child is not already known to social workers. If a file already exists, the new information will be added to the chronology.

See Appendix 3 below for detailed record keeping guidance.

16. Response from Children's Social Care to a school referral

• Referral

Once a referral is received by the MASH team, a manager will decide on the next course of action within one working day. When there is concern that a child is suffering, or likely to suffer significant harm, this will be decided more quickly and a strategy discussion held with the Police and Health professionals and other agencies as appropriate (section 47 Children Act 1989) .

The Designated Safeguarding Lead should be told within three working days of the outcome of the referral. If this does not happen s/he will contact the team.

• Assessment

All assessments should be planned and co-ordinated by qualified social worker. They should be holistic, involving other professionals, parents/carers and the children themselves as far as practicable. Assessments should show analysis, be focused on outcomes and usually take no longer than 45 working days from the point of referral. College staff have a responsibility to contribute fully to the assessment.

• S47 Enquiries (regarding significant harm)

The process of the investigation is determined by the needs of the case, but the child/young person will always be seen as part of that process and sometimes without parents' knowledge or permission. On occasions, this will mean the child/young person is jointly interviewed by the Police and social workers, sometimes at a special suite where a video-recording of the interview is made.

• The Child Protection Conference

If, following the s47 enquiries, the concerns are substantiated and the child is judged to be at risk of significant harm, a Child Protection Conference (CPC) will normally be convened. The CPC must be held within 15 days of the first strategy discussion and College staff will be invited to attend - normally the DSL or Principal. This person will produce a written report in the correct format (a pro forma is

available on the DSCB website). This will be shared with the child/young person and his/her family before the conference is held. A copy will also be sent to the person chairing the initial CPC at least 24 hours in advance.

More information is in the inter-agency safeguarding procedures ('Child Protection Conferences') on the DSCB website.

If the DSL disagrees with the decisions made by social workers regarding the outcome of the referral, the conclusions of the assessment or any actions taken, the matter should be discussed and if necessary escalated to more senior managers (under the Escalation Policy available on the DSCB website), particularly if the child's situation does not appear to be improving.

17. Responding to allegations or concerns about staff or volunteers

17.1 Rigorous recruitment and selection procedures and adhering to the College's Code of Conduct and safer practice guidance will hopefully mean that there are relatively few allegations against or concerns about staff or volunteers. However, if a member of staff, or any other person, has any reason to believe that another adult has acted inappropriately or abused a child or young person, they will take action by reporting to the Principal (not the DSL if this is a different person). Even though it may seem difficult to believe that a colleague may be unsuitable to work with children, the risk is far too serious for any member of staff to dismiss such a suspicion without taking action.

17.2 If the allegation/concern is about the Principal the person with concerns will contact the Chair of Governors or the Designated Officer (also known as the LADO) in the Local Authority Safeguarding and Standards Team. See Appendix 1 below for contact numbers.

17.3 In all cases of allegations against staff or volunteers, the Principal and Chair of Governors, will contact the Designated Officer (LADO) without delay and follow the correct procedures as set out in Dealing with Allegations of Abuse Against Members of Staff and Volunteers. This must comply with Part Four of 'Keeping Children Safe in Education' 2016.

18. Children with special educational needs and who are disabled

18.1 Research shows that children with special educational needs and who are disabled are especially vulnerable to abuse and adults who work with them need to be vigilant and take extra care when interpreting apparent signs of abuse or neglect.

18.2 Additional barriers can exist for adults who work with such children, in respect of recognising abuse and neglect. These can include

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and who are disabled can be disproportionately impacted by things like bullying – without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers

18.3 These child protection procedures will be followed if a child with special educational needs or who is disabled discloses abuse or there are indicators of abuse or neglect. There are no different or separate procedures for such children.

18.4 Staff responsible for intimate care of children will undertake their duties in a professional manner at all times and in accordance with the College's Intimate Care Policy.

The College will add an appendix regarding ways in which children with communication difficulties can be assisted – as far as possible - to convey how they are feeling and to report issues of concern. The College will also add details of any other training, policies or procedures in place which contribute to keeping safe our students with SEN or who are disabled.

19. Safer Working Practice

19.1 All adults who come into contact with children at this College will behave at all times in a professional manner which secures the best outcomes for children and also prevents allegations being made. Detailed advice on safer working practice can be found in the College's Code of Conduct and Guidelines for Safer Working Practices for the Protection of Children and Staff

19.2 We promote a culture whereby members of the College community should feel able to raise with the Principal, or any member of the Leadership Team, any concerns about staff conduct. If the reporter feels that the issue has not been addressed they should contact someone outside of the school, such as the Chair of Governors or the LADO. (See Appendix 1 below for contact number.)

20. Training

- 20.1 Child protection will be part of induction for all staff and regular volunteers new to the College. They will be given a copy of this policy, the Code of Conduct, details about the role of the DSL and part one of 'Keeping Children Safe in Education: information for all school and college staff' plus Annex A if they work directly with children.
- 20.2 This will be followed up by basic child protection training that equips individuals to recognise and respond appropriately to concerns about students.
- 20.3 A proportional risk based approach will be taken regarding the level of information provided to all temporary staff and volunteers. As a minimum they will be provided with, and will be expected to follow, the Child Protection Summary Sheet which forms part of this policy.
- 20.4 Staff who do not have designated responsibility for safeguarding and child protection, including the Principal, will undertake suitable refresher training every three years. Prevent training should also be revisited every three years.
- 20.5 All staff will have training in preventing radicalisation and extremism ('Prevent') – either by attending a Workshop to Raise Awareness of Prevent (WRAP) or completing an on-line course, followed by a discussion with the DSL. The DSL is the Prevent Lead and will attend WRAP. This will be revisited every three years or earlier if required.
- 20.6 In addition, all staff members will receive regular safeguarding and child protection updates from the DSL as required, but at least annually. This will include learning from local and national serious cases when the learning becomes available.
- 20.7 When DSLs and Deputies take up the role they will attend enhanced (Level 3) training – provided through the DSCB multi-agency course. They must be updated at 2 yearly intervals after that.
- 20.8 In addition, their knowledge and skills will be updated regularly - at least annually. These individuals are expected to take responsibility for their own learning about safeguarding and child protection by, for example: taking time to read and digest newsletters and relevant research articles; attending training offered by DSCB on matters such as domestic abuse, attachment and child sexual exploitation; completing on-line training on FGM; attending local DSL forums etc.
- 20.9 Designated Teachers for Looked-After Children (mandatory for maintained schools and academies; good practice in independent schools which have or likely to have Looked-After Children) will undertake appropriate training. In Dorset this is provided by the Virtual School for Children in Care.
- See Appendix 1 for contact details.
- 20.10 The Principal and at least one Governor will complete Safer Recruitment Training (mandatory in maintained schools; best practice in others) either through a multi-agency taught session or by completing the NSPCC on-line course.
- 20.11 It is recommended by the DSCB that all Governors attend training, briefings or other input which equips them to understand fully and comply with their legal safeguarding duties *as Governors*, set out in 'Keeping Children Safe in Education' 2016. Attendance includes those who also work with children and have attended child protection training in that role.

21. Raising concerns about safeguarding practice in our College

- 21.1 In this College we promote a culture where any staff or volunteers feel able to raise with the Principal any concerns about safeguarding or child protection practice.
- 21.2 Any issues which they have not been able to resolve with the Principal should be reported to the Governors in the first instance. If they are still not satisfied they should approach the Director for Children's Services or, if the issue relates to the conduct of or allegation against a member of staff, should contact the local designated officer (also known as the LADO).
- 21.3 Staff should refer to the College's Whistle-Blowing Policy for more information or can use the NSPCC whistle blowing helpline: 0800 0280285.

22. Information for parents and carers

- 22.1 At this College we are committed to keeping our students safe. Our first priority is your child's welfare and we will usually discuss with you any concerns we have about your child. There might be rare occasions, however, when we have to provide information to or consult other agencies such as Children's Social

Care before we contact you. This will include situations where we judge that to tell you first will or might put your child at risk of significant harm.

23.2 Our responsibilities are set out in this policy. It reflects statutory guidance and the Inter-Agency Safeguarding Procedures, which can be found on the Dorset Safeguarding Children Board website.

22.3 If you have any questions about this please speak to the Designated Safeguarding Lead: Zillah Rainback

This page should be printed separately and given to all supply/peripatetic/ temporary staff who will be working unsupervised with children, even if just for part of a day

C. Child Protection Summary for all Visiting Professionals at Budmouth College

As an adult working directly with children in this College you have a duty of care towards all students. This means you must act at all times in a way that is consistent with their safety and welfare.

It is your responsibility to keep your child protection training up to date; you might be asked for evidence of this.

You must follow the principles of safer working practice, which include use of technology – on no account should you contact or take images of students on personal equipment, including your mobile 'phone.

If the behaviour of another adult in the College gives rise to concern you must report it to the Principal.

If you have a concern about a child, particularly if you think s/he may be suffering or at risk of suffering harm, it is your responsibility to share the information promptly with the Designated Safeguarding Lead (DSL) or the Deputy who are Zillah Rainback and Lucy Vincent

The following is not an exhaustive list but you might become concerned as a result of:

- Seeing a physical injury which you believe to be non-accidental
- Observing something in the appearance of a student which leads you to think his/her needs are being neglected
- A student telling you that s/he has been subjected to some form of abuse

In any of these circumstances you must write down what you observed or heard, date and sign the account and give it to the DSL or a Deputy.

If a student talks to you about (discloses) sexual or physical abuse you:

- Listen carefully without interruption, particularly if s/he is freely recalling significant events
- Only ask sufficient questions to clarify what you have heard. You might not need to ask anything but, if you do, you must not 'lead' the pupil in any way so should only ask 'open' questions
- Make it clear you are obliged to pass the information on, but only to those who need to know
- Tell the DSL or Deputy without delay
- Write an account of the disclosure as soon as you are able (definitely the same day), date and sign it and give it to the DSL.

Do not ask the student to repeat the disclosure to anyone else in College, ask him/her or any other student to write a 'statement', or inform parents. You are not expected to make a judgement about whether the child is telling the truth.

Remember – share any concerns, don't keep them to yourself.

1) For NEW referrals contact MASH (Multi agency safeguarding hub) - 01202 228866

2) To contact children's allocated social workers:

West Area 01305 221450
(Previously Bridport and Dorchester teams)

East Area 01202 474106
(Previously Ferndown and Christchurch teams)

Central Area
Purbeck 01929 553456

North Dorset 01258 472652

South Area
(Weymouth & Portland) 01305 760139

3) Out of Hours Service 01202 657279

4) Dorset Safeguarding and Standards Team
01305 221122

The team comprises Children's Services managers and advisors including:

- The Education Safeguarding Standards Advisor who offers advice and support to Headteachers and Designated Safeguarding Leads in relation to safeguarding and child protection issues
- The Local Authority Designated Officer (the LADO) to whom allegations against adults who work with children in education establishments must be reported
- The Children's Services 'Prevent' Lead

5) Dorset Virtual School for children who are in care/ Looked After
01305 228307

6) Dorset Governor Services (for governor safeguarding training)
01305 224382

Possible Indicators of Abuse

The following information is not designed to turn College staff into experts but it will help them to be more alert to the signs of possible abuse. The examples below are not meant to form an exhaustive list; Designated Safeguarding Lead and other staff will find it helpful to refer to Government advice 'What to do if you are worried about a child being abused' (2015) and the inter-agency safeguarding procedures on the Dorset Safeguarding Children Board website.

i) Physical Abuse

Most children will collect cuts and bruises in their daily lives. These are likely to be in places where there are bony parts of the body, like elbows, knees and shins. Some children, however, will have bruising which is less likely to have been caused accidentally. An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury or there are differing explanations. A delay in seeking medical treatment for a child when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children with different skin tones or from different ethnic groups and specialist advice may need to be taken.

Patterns of bruising that are suggestive of physical child abuse can include:

- bruising in children who are not independently mobile
- bruises that are seen away from bony prominences
- bruises to the face, back, stomach, arms, buttocks, ears and hands
- multiple bruises in clusters
- multiple bruises of uniform shape
- bruises that carry the imprint of an implement used, hand marks, fingertips or a belt buckle

Although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any child who has unexplained signs of pain or illness must be seen promptly by a doctor.

Other physical signs of abuse can include:

- cigarette burns
- adult bite marks
- broken bones
- scalds

Changes in behaviour which can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example wearing long sleeves in hot weather
- missing College
- running away from home

ii) Emotional Abuse

Emotional abuse can be difficult to measure, and often children who appear otherwise well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. *Children who live in households where there is domestic violence often suffer emotional abuse.* Emotional abuse can also take the form of children not being allowed to mix/play with other children.

The physical signs of emotional abuse can include:

- a failure to thrive or grow, particularly if the child puts on weight in other circumstances, e.g. in hospital or away from parents' care
- sudden speech disorders
- developmental delay, either in terms of physical or emotional progress.

Changes in behaviour which can also indicate emotional abuse include:

- neurotic behaviour, e.g. sulking, hair twisting, rocking

- being unable to play
- fear of making mistakes
- self-harm
- fear of parents being approached

iii) Sexual Abuse

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. It is important to remember that children can also be sexually abused by other children (ie those under 18)

Usually, in cases of sexual abuse it is the child's behaviour which may cause concern, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to, taken seriously and appropriate action taken promptly.

The physical signs of sexual abuse can include:

- pain or itching in the genital/anal areas
- bruising or bleeding near genital/anal areas
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

Changes in behaviour which can also indicate sexual abuse can include:

- sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- missing College
- running away from home
- sexual knowledge which is beyond their age or developmental level
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- alcohol / substance / drug use
- suddenly having unexplained sources of money
- not being allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults or other children

iv) Neglect

Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children and young people.

The physical signs of neglect can include:

- constant hunger, sometimes stealing food from other children
- being constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate dress for the conditions

Changes in behaviour which can also indicate neglect can include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised

It is important that adults in College recognise that providing compensatory care might address the immediate and presenting issue but could cover up or inhibit the recognition of neglect in all aspects of a child's life. Compensatory care is defined as 'providing a child or young person, on a regular basis, help or assistance with basic needs with the aim of redressing deficits in parental care'. This might involve, for example, providing each day a substitute set of clothing because those from home are dirty, or showering a child whose personal

hygiene or presentation is such that it is affecting his/her interaction with peers. It does not include isolated or irregular support such as giving lunch money or washing a child who has had an 'accident'. If any adult in College finds s/he is regularly attending to one or more aspects of a child's basic needs then this will prompt a discussion with the Designated Safeguarding Lead.

The general rule is: the younger the child, the higher the risk in terms of their immediate health. However, serious neglect of older children and adolescents is often overlooked, on the assumption that they have the ability to care for themselves and have made a 'choice' to neglect themselves. Lack of engagement with services should be seen as a potential indicator of neglect.

College staff should be mindful of the above and discuss any concerns with the DSL who will take the appropriate action in accordance with the inter-agency neglect guidance on the DSCB website.

Record Keeping: Best Practice To be read and followed by all DSLs and Deputies

1. Introduction

- 1.1 The importance of good, clear child welfare and child protection record keeping has been highlighted repeatedly in national and local Serious Case Reviews.
- 1.2 It is the Designated Safeguarding Lead (DSL)'s responsibility to ensure that child protection files, access, storage and transfer meet the required professional standards as detailed in this document.
- 1.3 The common law of confidentiality, Data Protection and Human Rights principles must be adhered to when obtaining, processing or sharing personal or sensitive information or records. In summary, the Data Protection Act requires that records should be securely kept, accurate, relevant, up to date and kept for no longer than is necessary for the purpose for which they were made.
- 1.4 Myconcern, an electronic record keeping system complies with the general standards set out below.

2. Record to be made by an adult receiving a disclosure of abuse (when a child talks about abuse)

- 2.1 This record should be made as soon as possible **after** the individual hearing the disclosure has reported it verbally to the DSL. The facts, not opinions (unless of particular relevance), should be accurately recorded in a non-judgemental way. It is important to remember that expressing an opinion as to whether the child is telling the truth is not helpful and can prejudice how a case proceeds.
- 2.2 The record should be recorded on Myconcern and should include:
 - The child's name, gender and date of birth
 - Date and time of the conversation
 - What was the context and who was present during the disclosure?
 - What did the child say? – verbatim if possible
 - What questions were asked? – verbatim
 - Responses to questions –verbatim
 - Any observations concerning child's demeanour and any injuries
 - The name of the person to whom the disclosure was reported
 - Printed name and job title of the author, followed by signature and date
- 2.3 The record about a disclosure of abuse should be passed to the DSL and retained in the student's child protection file in its original and contemporaneous form (as it could be used as evidence in court proceedings), even if later typed or if the information is incorporated into a report.
- 2.4 The College should never ask students, regardless of their involvement in a child protection matter (i.e. the subject of an allegation, a witness or the alleged 'perpetrator'), to write out their 'statements' of what has happened. In some cases this could have the unintended consequence of jeopardising a child protection investigation. This applies regardless of whether the incident(s) took place within or outside College.

3. Records kept by the Designated Safeguarding Lead

- 3.1 As stated at 2.2 above it is useful and recommended practice for College staff to have one standard pro forma for recording all 'welfare' and child protection concerns.
- 3.2 The Myconcern form should be sent to the DSL who will make a judgement about what action needs to be taken, in accordance with local inter-agency safeguarding procedures, using the Threshold Tool, if necessary. The decision about any action, whether or not a referral is made to Social Care, will be recorded clearly by the DSL.
- 3.3 Concerns which initially seem trivial may turn out to be vital pieces of information later, so it is important to give as much detail as possible. A concern raised may not progress further than a conversation by the DSL with the parent, or, at the other end of the scale, could lead to matters being heard in a court.

- 3.4 All 'lower level'/pastoral concerns about a child's welfare, which will generally have been discussed with parents/carers, are kept in the child's main file.
- 3.5 It is never good practice to keep student welfare records in a diary or day-book system. Often it is only when a number of seemingly minor issues relating to an individual student over a period of time are seen as a whole that a pattern can be identified indicating a child protection concern.

4. Starting a College child protection file

- 4.1 A College child protection file does not necessarily mean that the student is or has been the subject of a child protection conference or plan. 'Child protection file' denotes a high level of College concern which has warranted referral to/involvement of, and in most cases assessment by, child care social workers.
- 4.2 It is the responsibility of the DSL to start a College child protection file when a social worker is or was involved, e.g.:-
- a) A formal referral is made by the College to Children's Social Care on an inter-agency referral form or
 - b) Social Care inform the College they have commenced an assessment in relation to a student resulting from information from another source or
 - c) A child protection file is forwarded to the College by a previous school or pre-school attended by the student or
 - d) A child who is in care/looked after transfers into the College or
 - e) A student is privately fostered
- 4.3 It is not good practice to make 'family files'; each child should have his/her own record which includes information specific to him/her and which will be sent to the next school at the time of transfer. The names of siblings and/or other children who live in the household who also attend the College should be clearly noted on individual files.
- 4.4 If two (or more) students at the College are referred to Social Care for the same concern (for example, an allegation of sexually harmful behaviour), then child protection files will be started on both/all students.
- 4.5 'Document wallet' - type files are not ideal as the papers therein can easily fall out or get 'out of order'.
- 4.6 College child protection files are never 'closed' or de-categorised. Once the College has started a child protection file, the chronology is maintained so that any future concerns can be considered in the context of past events, even if Social Care ceases involvement.
- 4.7 Note - If there is an allocated social worker because a child is disabled or a young carer and there are no child protection concerns then a child protection file should not be started.

5. Adopted children

- 5.1 Some older adopted children will have College child protection files because they were initially in care/looked after and were subsequently adopted. During the period when the child is 'placed for adoption' (prior to an adoption order being made) any file that contains information that identifies both the birth family and the adoptive family must be classed as highly sensitive and this information should only be shared on a strictly 'need to know' basis.
- 5.2 Once the Adoption Order has been made the DSL in the College that holds the child protection file must overhaul the file. The principle is that there must be nothing that identifies the child's birth name or the birth family. In sifting the file it is acceptable to destroy documents that will continue to be held by other agencies: for example, child protection conference minutes and LAC review minutes which will be in Social Care records.
- 5.3 A chronology should be prepared that gives an overview of the information previously held in the file but **without giving the child's birth name or any details which would identify the birth family.**
- 5.4 The overhauled file should only contain the new chronology and any information that has originated from within College (for example concern forms). This file should now be in the child's new name, contain no information which identifies the birth name or birth family, will be held in the College as long as the child remains or sent onto a new school as described (at 9) below.

- 5.5 Please note that once a child is adopted, all College records, not just CP files, must be amended so that there is nothing which gives the birth name or identifies the birth family.

6. The format of child protection files

- 6.1 It is helpful if individual files have a front sheet with key information about the student and contact details of parents/carers, social worker and any other relevant professionals.
- 6.2 If the child is Looked-After the front sheet should include important information about legal status, parental responsibility, arrangements for contact with birth parents and extended family, levels of authority delegated to carers and the name of the virtual school head in the authority that looks after the child.
- 6.3 If a student is or was subject of a child protection plan or in care/looked after, this should be highlighted in some way to make it immediately obvious to anyone accessing the record.
- 6.4 It is a multi-agency standard that children's child protection files must have at the front an up to date chronology of *significant* incidents or events *and* subsequent actions/outcomes. Maintaining the chronology is an important part of the DSL role; it aids the DSL, Deputy and others to see the central issues 'at a glance' and helps to identify patterns of events and behaviours.
- 6.5 It should make sense as a 'stand alone' document: anyone else reading the chronology should be able to follow easily what the concerns are/have been, whether the concerns have escalated and why plus the actions taken by the College to support and protect the child. This will be particularly useful for DSLs in receiving schools when students transfer, for professionals involved in collating information for Serious Case Reviews and for parents/students/ex-students if they view the record.
- 6.6 Once a chronology is started it should be updated as appropriate even if Social Care later ceases involvement (see 4.6 above).
- 6.7 The file should be well organised and include, as appropriate, College 'concern forms', copies of correspondence, College reports to and minutes of child protection conferences, documents relating to children in care/looked after' etc. The DSL will decide which relevant information which pre-dates the starting of the child protection file, such as CAF or other pastoral care documentation, will also be included.

7. Storage

- 7.1 All records relating to child protection concerns are sensitive and confidential so will be kept in a secure (i.e. locked at all times) filing cabinet, separate from other College files, and accessible through the DSL and the Deputy.
- 7.2 The student's general College file are marked with a safeguarding sticker and on quick note on SIMS to indicate that there has been some kind of safeguarding concern. All staff who may need to consult a child's College file should be made aware of this and to speak to the DSL if necessary if they see the note and have concerns. For example, a member of the office staff who is looking in the main file for a parent's contact details because of unexplained absence might decide to report this to the DSL if they see the indicator, in case the absence is significant.

8. Sharing of and access to child protection records

- 8.1 It is highly unlikely that all members of staff need to know the details of a child's situation, or that there should be widespread access to the records. Access to, and sharing of, information should be on a need-to-know basis, decided case by case. The DSL is the best person to decide this. Consideration must also be given to *what* needs to be shared. Generally speaking, the closer the day-to-day contact with the child, the more likely the need to have some information.
- 8.2 The child who is the subject of a child protection record has the right to access the file, *unless* to do so would affect his/her health or well-being or that of another person, or would be likely to prejudice a criminal investigation or a Section 47 assessment (which relates to significant harm) under the Children Act 1989.
- 8.3 Parents (i.e. those with parental responsibility in law) are entitled to see their child's child protection file, with the same exemptions as apply to the child's right to access the record. Note that an older student may be entitled to refuse access to the record by his/her parents. As a guide, this applies to students who are 12 years of age or above, if they are of normal development or maturity.

- 8.4 References by name to children other than the student who is the subject of the file should be removed when disclosing records, unless consent is obtained from the individual/s concerned (or their parents/carer on their behalf). Care must be taken to ensure all identifying information is removed from the copy of the record to be shared.
- 8.5 Always seek advice from your legal advisor or Dorset Data Protection Officer (01305 225175) if there are any concerns or doubt about a child or parents reading records. However, it is generally good practice to share all information held unless there is a valid reason to withhold it, e.g. to do so would place the child or any other person at risk of harm. Any requests to see the child's record should be made in writing to give time for confidential information, such as any details of other pupils, to be removed.
- 8.6 In respect of requests from students or parents for information which wholly or partly consists of an educational record, access should be granted within 15 school days. This might be relevant to 'welfare' concerns in a main College file, for example. Viewing-only access to these records is free but it is reasonable to charge for copies on a sliding scale from £1 - £50 (maximum) depending on the number of pages.
- 8.7 However, should the request only seek access to a child protection file (which is not classed as an educational record), access should be granted within 40 calendar days. A discretionary maximum fee of £10 can be charged for viewing access to or a copy of a child protection record.
- 8.8 If the record to be disclosed contains information about an adult professional, that information can be disclosed if it relates to the performance by that person of their job or other official duties e.g. a reference to a teacher in their teaching role or the First Aider in their first aid role. However, if the reference refers to that individual's private life, it should be removed (unless this relates to a child protection matter which is relevant to the record to be disclosed).
- 8.9 Child protection information should not normally be shared with professionals other than those from Social Care, the Police, Health or the Local Authority. Ofsted and other school inspectors can view individual child protection files. Information should not be released to parents' solicitors on request; advice should be sought from the school's legal advisor in such cases.
- 8.10 Governors, including the Nominated Governor, should not access the records.

9. Transfer of child protection records

- 9.1 When a student transfers to another school (including to a Learning Centre because of permanent exclusion) the DSL should inform the receiving school as soon as possible in person or by telephone that child protection records exist. The original records must be passed on either by hand or sent by recorded delivery, separate from the child's main College file. Care must be taken to ensure confidentiality is maintained and the transfer process is as safe as possible.
- 9.2 If the records are to be posted, they should be copied and these copies retained until there has been confirmation in writing that the originals have arrived at the new school. They can then be shredded.
- 9.3 Whether child protection files are passed on by hand or posted, there should be written evidence of the transfer (such as a form or slip of paper signed and dated by a member of staff at the receiving school.) This receipt should be retained by the originating school for 6 years (in line with guidance from the Records Management Society).
- 9.4 If the student is removed from the roll to be home educated, the College should pass the child protection file to the LA EHE Administrator and a receipt obtained as described above.
- 9.5 If a student with a child protection record leaves the College without a forwarding address and no contact is received from a new school the DSL should follow the school's Child Missing Education (CME) procedures. If there is reason to suspect the student is suffering harm then the DSL will refer to Social Care in the usual way.
- 9.6 If a child arrives in the College in an unplanned way and/or there are concerns about them from the outset, it is worth contacting the previous school for a discussion with the DSL. There might be a CP file which has not been passed on.
- 9.7 College 'welfare' or pastoral records (ie where concerns or issues have been raised but there has been **no** referral to or involvement by a social worker) should also be passed on to the next school for their information and can be included in the main school file, for example. In respect of data protection, parents/carers should be made aware (either individually or through newsletters, for example) that information is transferred in this way to enable the next school to properly support their child. Most

parents will understand the reason for this but if for whatever reason a parent disagrees with you passing on non-child protection documents, you should not do so.

10. 'Dual registered' Students

10.1 Where a student is on roll at the College and starts to attend a Learning Centre (LC), the chronology and other relevant information in the child protection file should be copied and passed to the DSL at the LC at the earliest opportunity. Due to the nature of such 'bespoke' arrangements for individual students, the two DSLs should agree on which one of them will keep the chronology updated and how best to communicate to each other significant events and issues in relation to that student.

11. Retention of records

11.1 The College should retain the record for as long as the student remains in College and then transferred as described above.

11.2 Guidance from the Records Management Society is that when a student with a child protection record reaches statutory school leaving age (or where the student completed 6th form studies), the last school attended should keep the child protection file until the student's 25th birthday. It should then be shredded (and a record kept of this having been done, date, and why).

11.3 The Independent Inquiry into Child Sexual Abuse has instructed relevant organisations, including schools and colleges, that they should NOT destroy, for the foreseeable future, any of their records that could potentially come within the scope of the inquiry (i.e. any records relating to sexual abuse).

12. Electronic child protection records

12.1 Electronic records must be password protected with access strictly controlled in the same way as paper records.

12.2 They should be in the same format as paper records (ie with well maintained chronologies etc) so that they are up to date if/when printed, if necessary.

12.3 Electronic files must not be transferred electronically to other schools unless there is a secure system in place (such as cjsm, GCSX or IronPort) but should be printed in their entirety, linked with paper documentation such as conference minutes and transferred as described in section 9 above. When the receipt has been returned to confirm that the file has been received at the new school, the computer record should be deleted.

13. Sharing information with Further Education (FE) Colleges

13.1 A protocol is in place with DSLs at FE colleges: at the start of each academic year they will send to secondary school DSLs a list of newly enrolled students who have previously attended the school, requesting any relevant information. Secondary school DSLs will use their professional judgement but should always disclose if a young person is in care/looked after, is or has been subject of a child protection plan or is assessed as posing a risk to themselves or other students.

13.2 Note this applies only to Dorset schools and FE Colleges with whom the protocol has been agreed.

Annex A

When deciding whether to involve the police and/or Children's Social Care, consideration should be given to the following questions. Answering these questions will support the DSL in considering whether a young person is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the College can manage the incident and support the young people directly.

Do you have any concerns about the young person's vulnerability?

Consideration should be given to whether a young person's circumstances or background makes them additionally vulnerable. This could include being in care, having special educational needs or disability or having been a victim of abuse.

Where there are wider concerns about the care and welfare of a young person then consideration should be given to referring to Children's Social Care.

Why was the imagery shared? Was it consensual or was the young person put under pressure or coerced?

Young people's motivations for sharing sexual imagery include flirting, developing trust in a romantic relationship, seeking attention or as a joke.

Though there are clearly risks when young people share imagery consensually, young people who have been pressured to share imagery are more likely to report negative consequences.

A referral should be made to the police if a young person has been pressured or coerced into sharing an image, or imagery is being shared without consent and with malicious intent.

Consideration should also be given to a young person's level of maturity and the impact of any special educational needs on their understanding of the situation.

You should take disciplinary action against students who pressure or coerce others into sharing sexual imagery. If this is part of pattern of behaviour then you should consider making a referral to a Harmful Sexual Behaviour service, such as the National Clinical Assessment and Treatment Service (an NSPCC service).

Has the imagery been shared beyond its intended recipient? Was it shared without the consent of the young person who produced the imagery?

The imagery may have been shared initially with consent but then passed on to others. A student may have shared the image further with malicious intent, or they may not have had a full understanding of the potential consequences.

Consideration should also be given to a young person's level of maturity and the impact of any special educational needs on their understanding of the situation.

The police should be informed if there was a deliberate intent to cause harm by sharing the imagery or if the imagery has been used to bully or blackmail a student.

Has the imagery been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread of the imagery?

If the image has been shared widely on social media, this could cause significant embarrassment for the student and have a long term impact on their online reputation. It could also increase the risk of them being bullied or contacted by strangers online.

You should support a young person to report the imagery to any sites it is hosted on. You can find information on reporting in Annex D.

If the young person has tried to report the imagery and it has not been removed the young person should contact ChildLine who work in partnership with the Internet Watch Foundation (IWF) to have youth produced imagery removed from the internet. You could also contact the Professionals Online Safety Helpline for advice and support.

If the young person is being contacted by people they don't know who have viewed the image then you should report to NCA-CEOP.

How old is the young person or young people involved?

Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity by under 13s should be referred to the police.

Being older can give someone power in a relationship so if there is a significant age difference it may indicate the young person felt under pressure to take the image/video or share it.

Consideration should also be given to a young person's level of maturity and the impact of any special educational needs on their understanding of the situation.

If you believe the imagery contains acts which you would not expect a young person of that age to engage in then you should refer to the police. The Brook Traffic Light tool provides guidance on harmful sexual behaviour at different ages.

Did the young person send the image to more than one person?

If a student is sharing sexual imagery with multiple people this may indicate that there are other issues which they need support with. Consideration should be given to their motivations for sharing.

If you believe there are wider safeguarding concerns then you should make a referral to Children's Social Care.

Does the young person understand the possible implications of sharing the image?

Young people may produce or share imagery without fully understanding the consequences of what they are doing. They may not, for example, understand how it may put them at risk or cause harm to another young person. They may also not understand consent.

Exploring their understanding may help you plan an appropriate response helping you assess, for example, whether they passed on an image with deliberate intent to harm.

Are there additional concerns if the parents or carers are informed?

Parents should be informed of incidents of this nature unless there is good reason to believe that informing them will put the young person at risk. This may be due to concerns about parental abuse or cultural or religious factors which would affect how they or their community would respond.

If a young person highlights concerns about involvement of their parents then the DSL should use their professional judgement about whether it is appropriate to involve them and at what stage. If the College chooses not to involve a parent they must clearly record the reasons for not doing so.

Where possible young people should be supported to speak with their parents themselves about the concerns.

Annex B

Age considerations

When considering appropriate action regarding youth produced sexual imagery, the Designated Safeguarding Lead (DSL) will need to take the age of the children and young people involved and the context into account, as this will influence decision making and may determine the most appropriate action required.

Younger children

Children under 13 are given extra protection from sexual abuse under the Sexual Offences Act 2003. This law makes it clear that sexual activity with a child under 13 is never acceptable, and that children of this age can never legally give consent to engage in sexual activity. This applies to children who have not yet reached their 13th birthday i.e. children who are aged 12 and under.

Any situations involving children under 13 and youth produced sexual imagery must be taken seriously as potentially being indicative of a wider safeguarding or child protection concern or as being problematic sexual behaviour.

The understanding of children and young people around the potential implications of taking and/or sharing youth produced sexual imagery is likely to be influenced by the age and ability of the children involved. In some cases children under 13 (and indeed older) may create youth produced sexual imagery as a result of age appropriate curiosity or risk-taking behaviour or simply due to naivety rather than any sexual intent. This is likely to be the behaviour more commonly identified within primary schools. Some common examples could include sending pictures of their genitals to their friends as a dare or taking a photo of another child whilst getting changed for PE. Within this context it is unlikely that police or Children's Social Care involvement is required or proportionate but DSLs will need to use their professional judgement to consider the specific context and the children involved.

Sexual behaviour

DSLs will need to be mindful that behaviour which may not initially appear to be sexually motivated may have occurred as a result of risky or harmful behaviour or indeed sexual abuse being 'normalised' for children.

Difficulties in defining harmful sexual behaviours displayed by children and young people are made worse by a general lack of knowledge of childhood sexuality and what constitutes normal sexual development. The Hackett (2012) continuum of children and young people's sexual behaviours shows how behaviours exist on a continuum from normal to highly abnormal.

A continuum of behaviours

It is vital for professionals to distinguish normal from abnormal sexual behaviours. Chaffin et al (2002, p208) suggest a child's sexual behaviour would be considered abnormal if it:

- ✓ occurs at a frequency greater than would be developmentally expected
- ✓ interferes with the child's development
- ✓ occurs with coercion, intimidation or force
- ✓ is associated with emotional distress
- ✓ occurs between children of divergent ages or developmental abilities
- ✓ repeatedly recurs in secrecy after intervention by caregivers

Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

Normal

- Developmentally expected
- Socially acceptable
- Consensual, mutual, reciprocal
- Shared decision making

Inappropriate

- Single instances of inappropriate sexual behaviour
- Socially acceptable behaviour within peer group
- Context for behaviour may be inappropriate
- Generally consensual and reciprocal

Problematic

- Problematic and concerning behaviours
- Developmentally unusual and socially unexpected
- No overt elements of victimisation
- Consent issues may be unclear
- May lack reciprocity or equal power
- May include levels of compulsivity

Abusive

- Victimising intent or outcome
- Included misuse of power
- Coercion and force to ensure victim compliant
- Intrusive
- Informed consent lacking, or not able to be freely given by victim
- May include elements of expressive violence

Violent

- Physically violent
- Highly intrusive
- Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
- Sadism

DSLs must ensure that they are familiar with and follow the relevant local policies and procedures (including contact with local authorities or Local Safeguarding Children Boards) available for recognising and responding to harmful behaviours and/or underage sexual activity when dealing with children under 13 who may have been involved in creating or sharing youth produced sexual imagery. This is essential to ensure that children involved or identified are safeguarded and are not unnecessarily criminalised or labelled.

Additional tools to support DSLs include:

Lucy Faithfull/Parent's Protect leaflets for parents:

www.parentsprotect.co.uk/files/traffic_light_helping_you_understand_the_sexual_development_ofchildren_under_5.pdf

www.parentsprotect.co.uk/files/traffic_light_helping_you_understand_the_sexual_development_ofchildren_5-11.pdf

Brook Traffic Light Tool:

<http://www.brook.org.uk/index.php/traffic-lights>

Annex C

Working with parents and carers

Parents and carers need to be informed and supported to respond appropriately to incidents involving youth produced sexual imagery and it is vital that they are helped to play their part in helping to inform children about the risks.

Information for parents/carers about youth produced sexual imagery sits within a wider parental engagement strategy for online safety. It should help parents/carers to talk to their children about youth produced sexual imagery and respond appropriately should their child be involved in an incident.

Resources for parents and carers includes:

- An overview of what 'sexting' is, highlighting in particular that it includes the sending of images and videos
- The pressures, motivations and expectations faced by young people to behave sexually
- Information about consent and trust within healthy relationships
- Tips on how to have conversations with children about sexting
- Information on how much this takes place – showing that numbers are low but highlighting the vulnerabilities of those who share, particularly to those unknown to them
- Explanation of what the risks associated with youth produced sexual imagery are, especially recognising young people's fears/concerns
- Legalities of sexting and naked pictures or videos
- Tips on how parents and carers can support their children if their imagery has been publicly shared - signposting to relevant agencies and information/resources
- What parents and carers can do to help remove images/empower young people – see Annex D
- Role of police and the College in incidents – signposting to the Designated Safeguarding Led to empower parents to know they are asking the 'right' person

Helping parents and carers when their child has been involved in sexting

Young people can be involved in sexting in several different ways: they may lose control of their own image; receive an image of someone else; or share an image of another person. It can be difficult for those whose children have experienced any of these situations to know how to deal with the knowledge that their child has been involved in sexualised activity. Parents and carers may feel shocked, upset, angry, confused, or disappointed.

Whatever their feelings, it is important that professionals listen to their concerns and take them seriously. It can also be helpful for teachers and the police to reassure parents and carers by explaining that it is normal for young people to be curious about sex. Below are examples of the advice that police and the College could offer in a range of scenarios:

Parents or carers whose child has lost control of a sexual image should be:

- Advised on the law around youth produced sexual imagery.
- Directed to encourage the young person to delete images from social media accounts, if they have uploaded them themselves.
- Directed to ChildLine's partnership with the Internet Watch Foundation to see if it is possible to get the image removed if it has been shared more widely. This must be done as soon as possible in order to minimise the number of people that have seen the picture. Parents should also be informed about how to report sexual images on individual sites to get them taken down. If the image has been shared via a mobile, they should be informed that they can contact the mobile phone operator in order to get their child's mobile number changed.
- Helped to have conversations with their child which they may find difficult. Parents/carers may need help to shape these conversations. For example, you could suggest that they:
 - ✓ Reassure the young person that they are not alone and refrain from getting angry, letting them know that they will do everything they can to help.
 - ✓ Listen and offer support.
 - ✓ Avoid questions, such as 'why have you done this?' which may stop the young person from opening up. Instead they should stay focused on finding a solution, by asking who the image has been sent to and shared with, and agreeing next steps.
 - ✓ Help their child to understand what has happened by discussing the wider pressures that they may face and the motivations of the person who sent on the photo.
 - ✓ Discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't

want to do, or to show them things that they are unhappy about. Parents should let their children know that they can speak to them if this ever happens.

- Directed to the child's Behaviour Support Leader if they are concerned that their child is being bullied.
- Directed to services for Harmful Sexual Behaviour, such as the National Clinical Assessment and Treatment Service²⁴ (an NSPCC service), if appropriate, or if similar incidents have previously occurred.

Parents or carers whose child has been sent a sexual image should be:

- Advised on the law with regards to saving, sharing, or looking at naked or sexual images of children.
- Supported to have conversations with their child and advised to:
 - ✓ Reassure the young person that they have done the right thing by speaking out and that you are there to help.
 - ✓ Explain to the young person the importance of not sharing the image further.
 - ✓ Listen to the young person's concerns, without criticising their decisions.
 - ✓ Ask whether they requested the photo or if it was unsolicited. Confirm whether it has been sent by an adult or a young person.
 - ✓ Discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they are unhappy about. Let them know that they can speak to you if this ever happens.
 - ✓ If they asked to receive the photos, explain that they should also not put pressure onto others to do things that they are uncomfortable with.
- Provided with suggested ways that their child could speak to the sender in order to stop future correspondences. Alternatively, if the young person prefers, informed about how to block the sender.
- Directed to NCA-CEOP if the images were shared by an adult, if their child is being contacted by adults and they are concerned about sexual exploitation or grooming.

Parents or carers whose child has shared another child's image should be:

- Advised on the law with regards to saving, sharing, or looking at naked or sexual images of children.
- Supported to have conversations with their child and advised to:
 - ✓ Stay calm and refrain from getting angry with the young person.
 - ✓ Ask who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their phone or any social media accounts and reporting it to service providers.
 - ✓ Identify whether they asked for the photo or were initially sent it without requesting.
 - ✓ Discuss issues of consent and trust in healthy relationships or friendships. Talk about the types of things which are and aren't ok to share and how they would feel if someone shared a personal photo of them. If they have asked for the image, explain the importance of not pressuring others into activities that they may not want to take part in.
 - ✓ Ask about their motivations for sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way.
- Advised to contact the College DSL if they are concerned that their child is behaving in a sexually inappropriate way. They should also be directed to services for Harmful Sexual Behaviour, such as the National Clinical Assessment and Treatment Service, if appropriate, or if similar incidents have previously occurred.

All parents or carers whose child has been involved in any of the above should be:

- Given support to deal with their feelings of upset and concern.
- Kept updated about any actions that have been taken or any support that their child is accessing unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision.
- Advised to contact the College DSL, if they have received their child's consent, so that teachers are able to offer support to any student that is affected and ensure that the image is not circulated further.
- Informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a ChildLine counsellor, in house counselling services where available, or a GP. If they are concerned that their child is suicidal they should contact

999.

- Provided with information on where they are able to access support themselves if they are concerned or distressed.
- Directed to NCA-CEOP if they are concerned about child sexual exploitation or grooming.

Resources and support

In addition to any Local Safeguarding Children Board resources, the following resources can be used to support parents and children with youth produced sexual imagery, and are available on our website:

Helplines and reporting

- Children can talk to a ChildLine counsellor 24 hours a day about anything that is worrying them by ringing 0800 11 11 or in an online chat at <http://www.childline.org.uk/Talk/Chat/Pages/OnlineChat.aspx>
- If parents or carers are concerned that their child is being contacted by adults as a result of having shared sexual imagery they should report to NCA-CEOP at www.ceop.police.uk/safety-centre
- ChildLine and the Internet Watch Foundation have partnered to help children get sexual or naked images removed from the internet. More information is available at <http://www.childline.org.uk/explore/onlinesafety/pages/sexting.aspx>
- If parents and carers are concerned about their child, they can contact the NSPCC Helpline by ringing 0808 800 5000, by emailing help@nspcc.org.uk, or by texting 88858. They can also ring the Online Safety Helpline by ringing 0808 800 5002.

Advice and information for parents

- The NSPCC has information and advice about sexting available on its website: <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/1>
- NCA-CEOP has produced a film resource for parents and carers to help them prevent their children coming to harm through sharing sexual imagery: <https://www.thinkuknow.co.uk/parents/articles/Nude-selfies-a-parents-guide/>.
- Childnet have information and advice about sexting available on its website: <http://www.childnet.com/parents-and-carers/hot-topics/sexting>
Parent Info (www.parentinfo.org) provides information and advice to parents from expert organisations on topics ranging from sex and relationships, mental health and online safety. This includes content on sexting. The content of Parent Info is hosted for free on the College website via a newsfeed service.
- The UK Safer Internet Centre have produced checklists for parents on using social networks safely: www.saferinternet.org.uk/checklists

Resources parents could highlight to their children

- ChildLine have created Zip-It, an app that provides witty comebacks in order to help young person say no to requests for naked images: <https://www.childline.org.uk/Play/GetInvolved/Pages/sexting-zipit-app.aspx>
- There is information on the ChildLine website for young people about sexting: <https://childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/>
- The Safer Internet Centre has produced resources called 'So You Got Naked Online' which help young people to handle incidents of sexting: [http://childnetsic.s3.amazonaws.com/ufiles/Files%202015/SYGNO%20Booklet%20 - %20version%20%20May%202015.pdf](http://childnetsic.s3.amazonaws.com/ufiles/Files%202015/SYGNO%20Booklet%20-%20version%20%20May%202015.pdf)

Annex D

Reporting youth produced sexual imagery online

- The quickest way to get content removed from the internet is for the person who posted it to take it down. If the young person posted the content themselves using their account, they should be asked to log in and delete it.
- If someone else posted the image or re-posted it, they should be asked to log in and delete it from any sites they've shared it on.
- If the College knows where the content is hosted but doesn't know who posted it, or the poster refuses to take it down, the content can still be reported to an online service. If it breaches a site's Terms of Service then it will be removed.

Each provider will have a different approach to dealing with requests for the removal of content and the speed of response. More information can be found on individual providers' websites where they should make public their Terms of Service and process for reporting. Nudity and sexual content is not allowed by the majority of the main providers. Sexual imagery of young people is illegal and should not be hosted by any providers.

The following provides an overview of the reporting functions provided by the main service providers:

Snapchat

Snapchat offers users the ability to share images/videos, which it calls 'snaps'. The snap is shared and then disappears after a few seconds. Snapchat also allows users to share Snapchat Stories: these are snaps that are shared in a sequence across a 24 hour period.

Snapchat provides a reporting function here: <http://support.snapchat.com/en-US/ca/abuse>

Users are able to block other users.

WhatsApp

WhatsApp is a messaging service where users can share pictures, text or videos. These can be shared with one person or multiple users.

WhatsApp encourages users to report problematic content, however, they advise that they generally do not have the contents of messages available to them. This can limit their ability to verify the report and take action.

Please see instructions on how to report here: <https://www.whatsapp.com/faq/en/general/21197244>

Users are able to block other users here: <https://www.whatsapp.com/faq/en/s60/21064391>

Instagram

Instagram is a picture and video sharing app which allows users to share images, make comments and post messages.

Instagram provides a reporting function here: <https://help.instagram.com/443165679053819/>

Users are able to block other users.

Facebook

Facebook is a social network which allows users to create a profile, share images, videos and messages.

Facebook provides a reporting function here: - Social reporting

<https://www.facebook.com/help/128548343894719>

This offers users the ability to contact other users directly to ask them to take something down that does not necessarily breach Facebook's terms of service. In some cases the young person may not feel comfortable in contacting the person directly so they can use the report flow to enable another trusted person to help them – e.g. a teacher, friend, parent.

- Public reporting - <https://www.facebook.com/help/263149623790594/>

Users who do not have a Facebook account are able to report directly to Facebook using the link above and completing the form.

Users are able to block other users.

YouTube

YouTube allows users to watch, create and share videos. Users can create their own YouTube account, make playlists and create their own channel. Users are also able to comment on other users' channels.

YouTube provides a reporting function here: <https://support.google.com/youtube/answer/2802027>

Users can report an individual video, a channel or a comment on a video. Only account holders can make reports on YouTube.

Google

The "right to be forgotten" ruling allows the public to request the removal of search results that they feel link to outdated or irrelevant information about themselves on a country-by-country basis. Users are able to complete a form to highlight what content they wish to be removed. Users have to specify why the content applies to them and why it is unlawful so the exact URLs relating to the search results need to be referenced. See https://support.google.com/legal/contact/lr_eudpa?product=websearch

A list of many other providers and links to their reporting functions can be found at the NSPCC's NetAware website: www.net-aware.org.uk

Support Services

If you need additional advice or support, the following organisations can assist:

Internet Watch Foundation

In the event that a site has no reporting function and if the content is a sexual image of someone under 18 you can report it to the Internet Watch Foundation (IWF). Sexual images of anyone under 18 are illegal and the IWF can work to get them removed from sites which do not have reporting procedures. Adults can report directly to the IWF here: www.iwf.org.uk. Young people can contact ChildLine who work in partnership with the IWF and will support young people through the process.

NCA-CEOP

www.ceop.police.uk/safety-centre

If you are concerned that a child is being sexually abused, exploited or groomed online you should report to NCA-CEOP

The NSPCC adults helpline

0808 800 5002

The NSPCC has partnered with O2 to offer direct support to parents and other adults on issues relating to online safety.

ChildLine

www.childline.org.uk

ChildLine offers direct support to children and young people including issues relating to the sharing of sexual imagery.

The Professionals Online Safety Helpline (POSH)

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

Tel: 0844 381 4772

The POSH helpline supports professionals with an online safety concern or an online safety concern for children in their care. Professionals are able to contact the helpline to resolve issues.

Annex E

Youth produced sexual imagery and the Ofsted Common Inspection Framework

The revised inspecting safeguarding arrangements for early years, education and skills settings, including schools which came into effect in September 2015, represent significant changes to the way in which online safety is inspected. For more information visit SWGfL, part of the Safer Internet Centre.

Inspecting safeguarding in early years, education and skills settings

The areas below highlight where online safety is mentioned and offer considerations to the College in relation to youth produced sexual imagery. For further information see the Ofsted website.

Section 10 – Definition of safeguarding

Youth Produced Sexual Imagery (sexting) is specifically mentioned in the definition of Safeguarding in the *'Inspecting Safeguarding in Early Years, Education and Skills settings'* guidance. It highlights that safeguarding action may be needed to protect children from – *'the impact of new technologies on sexual behaviour, for example sexting or pornography'*.

The College should consider:

- Having policies in place that reflect the use of technology outside of the College environment. Please see the E-Safety Policy and the Social Media Policy.
- Highlighting in the relevant policies the actions they will take as a College if a child shares, produces or receives youth produced sexual imagery. This policy and the Code of Conduct cover this.

Section 13 – The signs of successful safeguarding arrangements

They have well developed strategies in place to keep children and learners safe and to support them to develop their own understanding of these risks and in learning how to keep themselves and others safe. Leaders oversee the safe use of technology when children and learners are in their care and take action immediately if they are concerned about bullying or children's well-being.

The College should consider in relation to youth produced sexual imagery:

- Policies and practices that include and make reference to youth produced sexual imagery or sexting
- Designated Safeguarding Leads who understand the issues and can support others in College
- Awareness-raising for all staff in recognising youth produced sexual imagery, intervening when those issues arise and how serious issues are escalated both in and outside of College
- Providing effective reporting routes for children and young people
- Preventative education programmes for children and young people
- Clear policy (or references in existing policies) around the use of digital equipment in College and outside of College.
- Clear consequences if youth produced sexual imagery is produced and shared which impacts on the health and wellbeing of children and young people, including both on College or personal devices
- Clear staff procedure for managing incidents

Section 18 – Inspectors will want to consider evidence that:

Staff leaders and managers understand the risks posed by adults or young people who use the internet or other electronic means to bully, groom or abuse children, young people and vulnerable adults; there are well developed strategies in place to keep learners safe and to support them in learning how to keep themselves safe.

The College should consider in relation to youth produced sexual imagery:

- Appropriate staff development that includes youth produced sexual imagery and the risks to children and young people
- Integration of youth produced sexual imagery into appropriate curriculum areas (see section three for further information)

Section 18 – Inspectors will want to consider evidence that:

Staff leaders and managers oversee the safe use of electronic social media by staff and learners and take action immediately if they are concerned about bullying or risky behaviour.

The College should consider in relation to youth produced sexual imagery:

- Clear procedures for all staff around incidents of youth produced sexual imagery

- Reporting routes for children and young people
- Awareness raising training for all staff in College

Section 34 – Arriving at judgements about safeguarding arrangements

Inspectors will make a judgements on the personal development, behaviour and welfare of children and learners by evaluating, where applicable the extent to which the provision is successfully promoting and supporting children's and learners safety. In order to make those judgements, inspectors will consider among other things, children's and learners understanding of how to keep themselves safe from relevant risks such as exploitation and extremism, including when using the internet and social media. Inspectors should include online safety in their discussions with students and learners (covering topics such as online bullying and safe use of the internet and social media). Inspectors should investigate what the College does to educate students in online safety and how the provider or College deals with the issues when they arise.

- The College should consider in relation to youth produced sexual imagery:
- The College should provide children and young people with the opportunity to explore the issues around youth produced sexual imagery
- Children and young people should be confident about reporting incidents to the College, using any of the reporting routes provided
- Parents should be made aware of the risks to their children and supported in handling incidents

Annex G

Flowchart for responding to incidents

