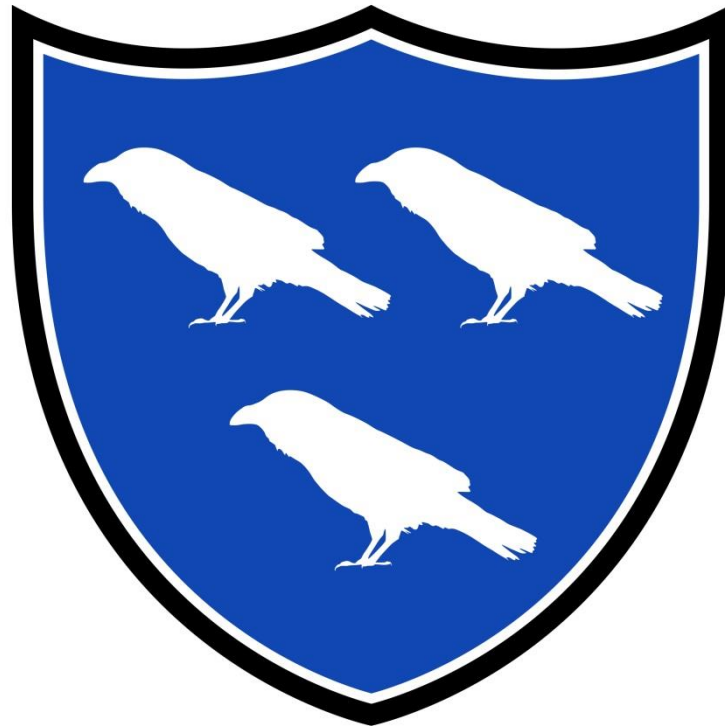


Valley Primary School



Child Protection & Safeguarding Policy

Updated: September 2023

Review Date: August 2024

The Governors and staff at Valley Primary School fully recognise the responsibility it has to the safeguarding and protection of pupils. All Governors and staff, including volunteers, have a full and active part to play in protecting children and young people from harm.

All staff and Governors believe that our school should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual pupil.

CONTENTS

1. Purpose and Aims
2. Legislation and Guidance
3. Definitions
4. Roles and Responsibilities
5. Equality
6. Promoting Children and Young People's Wellbeing
7. Signs and Behaviours of Abuse
8. Online Abuse and Cybercrime: Mobile Technology
9. Pupils with Special Educational Needs
10. Use of Reasonable Force
11. Safeguarding of Looked After Children
12. Emotional Wellbeing and Mental Health
13. Pupils with an Allocated Social Worker
14. Dealing with Disclosures
15. Confidentiality
16. Record Keeping
17. Safer Recruitment
18. Dealing with Concerns about Staff and Volunteers
19. Whistleblowing
20. Training
21. Use of School Premises for non-school activities

Appendix 1: Bromley Children Missing in Education

Appendix 2: Child Sexual Exploitation Warning Signs

Appendix 3: Child Sexual Exploitation Spot the Signs

Appendix 4: Brook Sexual Behaviours Traffic Light Tool 0-5 years

Appendix 5: Brook Sexual Behaviours Traffic Light Tool 5-9 years

Appendix 6: Brook Sexual Behaviours Traffic Light Tool 9-13years

Additional Advice and Support

Abuse or safeguarding Issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What to do if you re worried a child is being abused.pdf	DfE Advice
	Domestic Abuse: Various Information/Guidance https://www.gov.uk/guidance/domestic-abuse-how-to-get-help#history	Home Office
	Faith Based Abuse: National Action Plan https://www.gov.uk/government/publications/nationalactionplan-to-tackle-child-abuse-linked-to-faith-or-belief	DfE Advice
	Relationship Abuse: disrespect nobody https://www.disrespectnobody.co.uk/relationshipabuse/whatis-relationship-abuse/	Home Office Website
	OE Teachers' National helpline https://www.operationencompass.org/ 02045 5139990	DfE Advice
Bullying	Preventing bullying including cyberbullying https://www.gov.uk/government/publications/preventingandtackling-bullying https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying Advice for headteachers and School Staff 121114.pdf https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444865/Advice for parents on cyberbullying.pdf https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges (see linked documents)	DfE Advice
Children and the courts	Advice for 5 – 11 year old witnesses in criminal courts https://www.gov.uk/government/publications/youngwitnessbooklet-for-5-to-11-year-olds	MoJ Advice

Children missing from education, home or care	<p>Children missing education https://www.gov.uk/government/publications/childrenmissingeducation</p> <p>https://media.inzu.net/f0e9b37b8c44e338f64ae38c6d41e267/mysite/articles/602/Bromley_Children_Missing_Education_Policy_and_Procedure_June_2017.pdf</p>	DfE Statutory Guidance
	<p>Children missing from home or care https://www.gov.uk/government/publications/childrenwhorun-away-or-go-missing-from-home-or-care https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/271820/Flowchart_when_a_child_goes_missing_from_care.pdf</p>	DfE Statutory Guidance
	<p>Children and adults missing strategy https://www.gov.uk/government/publications/missingchildrenand-adults-strategy https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/117793/missing-persons-strategy.pdf</p>	Home Office Strategy
Children with Family Members in Prison	<p>National Information Centre on Children of Offenders https://www.nicco.org.uk/</p>	Barnardo's in partnership with Her Majesty's Prison and Probation Service advice
Children with Family members in the court system	<p>CAFCASS Cafcass, 16th Floor, Southern House, Wellesley Grove, Croydon, CR0 1XG Website: www.cafcass.gov.uk Call Centre: 0300 456 4000</p>	Bromley Safeguarding Partnership
Child Exploitation	<p>County Lines: Criminal exploitation of children and vulnerable adults https://www.gov.uk/government/publications/criminalexploitation-of-children-and-vulnerable-adults-county-lines</p>	Home Office Guidance
	<p>Child Sexual Exploitation: guide for practitioners https://www.gov.uk/government/publications/childsexual-exploitation-definition-and-guide-for-practitioners https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591905/CSE_Guidance_Annexes_13.02.2017.pdf</p>	DfE
	<p>Trafficking: Safeguarding Children https://www.gov.uk/government/publications/safeguardingchildren-who-may-have-been-trafficked-practice-guidance</p>	DfE and HO Guidance

	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims	
Special Educational Needs and Disabilities Information	SENDIASS Find your local IAS service (councilfordisabledchildren.org.uk)	Local Authority service

1. Aims and Success Criteria

We aim to ensure that:

- A culture of vigilance is created with all staff who will always act in the best interests a child.
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- A safe learning environment is created which allows all pupils to report concerns as and when they arise.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.
- All staff are aware of how GDPR regulations operate alongside sharing safeguarding information with other agencies.

We will be succeeding when:

- A safe learning environment has been created for all pupils.
- All staff have received appropriate training in child protection issues and procedures including online safety.
- All staff have Prevent training and FGM training (Home Office online training) and are alert to the signs and who to contact.
- All staff receive safeguard updates when necessary and termly update emails regarding specific safeguarding issues.
- When all staff receive E-Safety training
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Trust may put in place to protect them.
- All child protection concerns are dealt with promptly and recorded appropriately
- Information is promptly and carefully assessed and passed to relevant statutory agencies.
- All staff are provided with Part One and Annex B of Keeping Children Safe in Education (DfE 2023) and are aware of specific safeguarding issues.
- All Designated Officers undergo formal child protection training every two years (in line with local safeguarding partnership guidelines) and receive regular (annual) safeguarding refreshers (e.g. via e-bulletins)
- Ensuring that children are taught about safeguarding in an age appropriate way and they are clear and confident on how to report concerns as and when they arise.
- Ensuing appropriate filters and appropriate monitoring systems are in place to safeguard children from potential harmful and inappropriate online material and that staff understand their expectations, roles and responsibilities in relation to these. The DSL has responsibility for understanding the systems in place at the school (see Appendix 7)
- All staff know the process to make a referral to social care and to seek the support of the DSL.
- We create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- All staff are aware of escalating a concern as outlined in Bromley's Escalating Concerns policy.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children,\(2018\)](#) and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding children's board, which includes what contextual safeguarding is and implications on children.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- Statutory [guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018.](#), which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).
- [General Data Protection Legislation 2018](#)
- [Teaching Online Safety in School 2019](#) this guidance from the DfE outlines how schools can ensure their pupils understand how to stay safe and behave online as part of forthcoming and existing curriculum requirements.
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Head Teacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it’s proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- [Working Together to Improve School Attendance](#) includes information on how schools should work with local authority children’s services where school absence indicates safeguarding concerns

This policy also complies with our funding agreement and articles of association.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

Children includes everyone under the age of 18.

Victim Whilst ‘Victim’ is a widely understood and recognised term, not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. We will use any term the child feels most comfortable with when managing an incident

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms, however, at times, the term “*Instigator*” is used as in some cases, abusive behaviour can be harmful to the instigator too. Staff will decide what’s appropriate and which terms to use on a case-by-case basis.

The following **three safeguarding partners** are identified in KCSIE (2023) and defined in the Children’s Act 2004, as amended by chapter 2 of The Children and Social Work Act (2017). They will make arrangements to work together to safeguard and promote the welfare of local children including identifying and responding to their needs:

- Bromley LA
- Bromley CCG
- Chief of Police

The DSL will attend regular forums with local authority safeguarding partners and update the safeguarding team on changes in the local authority threshold of need.

4. Roles and Responsibilities

Safeguarding and child protection is **everyone’s** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent to the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
 - What constitutes sexual harassment and sexual violence and why they’re always unacceptable

The Board of Trustees has an overarching role in ensuring that policies, procedures and training in CONNECT schools are effective and comply with the law at all times. The Trust’s over-arching statement on Safeguarding and Child Protection is available on the website (www.connectschoolsacademytrust.com), but it is the responsibility of all schools within the Trust to develop their own policy to encompass the Trust’s ethos.

The Local Governing Bodies (LGB)

The Governing Board will:

Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head Teacher to account for its implementation

Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

Appoint a senior board level (or equivalent) lead [or, link governor] to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- The DSL takes lead responsibility for understanding the filtering and monitoring systems and processes in place at the school
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- All staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- The school has appropriate filtering and monitoring systems in place and review their effectiveness (See Appendix 10)
- The DfE's filtering and monitoring standards are reviewed, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
- All staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners
- Staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

Where we receive an allegation relating to an incident that happened when an individual or organization was using the school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities) this will be dealt with in the same way as any other safeguarding allegation. We will follow our usual policies and procedures including informing the LADO as appropriate.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Designated Safeguarding Lead

Valley Primary School has a Designated Safeguarding Lead (DSL) who is responsible for:

- promoting the safeguarding and welfare of all pupils;

- providing a safe environment for all pupils to learn;
- co-ordinating action within the school and liaising with Children's Social Care and other agencies over cases of abuse and suspected abuse;
- acting as a source of advice within the school;
- have a good understanding of harmful sexual behaviour;
- ensuring that staff are familiar with the policy and procedures;
- record keeping;
- referral of individual cases of suspected abuse;
- ensuring pupils are supported by an appropriate adult in the case of a police investigation or search;
- arrange and lead regular Safeguarding Team meetings;
- being aware of pupils who have a social worker;
- promoting educational outcomes by sharing information about the welfare, safeguarding and child protection issues with teachers and school leadership staff;
- discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare school policies;
- be confident in their knowledge of local specialist support for victims and instigators (widely referred to as perpetrators) in cases of sexual violence and sexual harassment and how to access this support;
- organising training on child protection and safeguarding within school;
- take lead responsibility for understanding the filtering and monitoring processes which are in place across the school.

The DSL is supported by a Safeguarding Team which includes a team of Deputy Designated Safeguarding Leads (DDSL). The Safeguarding Team should consist of no less than two people.

When a DDSL is leading on a safeguarding disclosure or concern (or when the DSL is different from the Head Teacher), they should liaise with the Head Teacher advising him/her of the issues and the ongoing enquiries under Section 47 of the Children Act 1989 and related police investigations.

During term time, the DSL will be available during normal school hours for staff to discuss any safeguarding concerns. Staff members can contact the DSL by email or phone outside of normal hours to discuss any safeguarding concerns.

Parents and other stakeholders can contact the DSL outside of normal hours by using the following email: concern@valley.bromley.sch.uk

When the DSL is absent, one of the DDSLs will be named as the cover.

Head Teacher

The Head Teacher must ensure that there is DSL in post and must ensure that up-to-date records relating to Child Protection are kept. These include:

- Staff training records;
- Signed Code of Safe Conduct forms;
- The Single Central Record (SCR).
- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly. This training must include online safety training.
- Ensuring that Induction training refers to Safeguarding Policy
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding low-level concerns;

- Ensuring the relevant staffing ratios are met where applicable, for example the ratios specific to early years provision;
- Overseeing the safe use of technology, mobile phones and cameras in the early years setting.

Staff

All staff will be given a copy of this Policy in September 2023 and on joining Valley Primary School and will sign the form to confirm that they have read and understood the Policy and agree to follow it. In addition, all staff will read and understand Parts 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2023](#), and review this guidance at least annually.

Staff will reinforce the importance of **online safety** when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).

Staff will know and understand their expectations, roles and responsibilities around the filtering and monitoring systems used in school.

Staff will provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including the staff Code of Conduct *and* the role of the designated safeguarding lead (DSL) and deputies, the **Behaviour Policy**, the **E-Safety Policy** and the safeguarding response to children who go **missing from education**. (See also safeguarding procedures for individual schools within the Trust)
- The early help process (sometimes known as the common assessment framework or **CAF**) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The **process for making referrals** to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they **identify a safeguarding** issue or a child tells them they are being abused or neglected, including specific issues such as **FGM**, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The **signs of different types of abuse and neglect**, as well as specific safeguarding issues, such as **Child-on-Child abuse**, child sexual exploitation (**CSE**), child criminal exploitation (**CCE**), indicators of being at risk from or involved with **serious violent crime**, **FGM** and **radicalisation**, and **serious violence** (including that linked to county lines) and these are rarely stand alone
- **Extra-familial** harms can take a variety of forms and be multiple
- **Previously looked after children** who potentially remains vulnerable. All staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.
- The importance of **reassuring victims** that they are being taken seriously and will be supported and kept safe.
- The fact that children can be at **risk of harm** inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi, trans or questioning (**LGBTQ+**) can be targeted by other children
- What to look for to **identify children** who need help or protection
- **Children not feeling ready or knowing** how to tell someone that they are being abused, exploited, or neglected. They may not recognise their experiences as harmful, and may feel embarrassed, humiliated, or may be being threatened. Staff should determine how best to build trusted relationships with children and young people which facilitate communication.

Volunteers

Volunteers and work experience students who work in CONNECT schools will have training on Child Protection issues, be vigilant and understand the processes to report any concerns to a member of staff. A member of the safeguarding team will carry out this training.

5. Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Have a social worker allocated to them
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are missing from education
- Are at risk due to their own or a family member's mental health needs
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are looked-after, or have previously been looked after
- Are in receipt of Early Help (CAF)

6. Promoting Children and Young People's Well-being

Opportunities to teach safeguarding

We have a duty to ensure that children are taught about how to keep themselves and others safe, including online. Relevant topics will be included within Relationships and Health Education

We understand that we play a crucial role in preventative education which prepares our children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. We have a clear ethos and set of values which are upheld and demonstrated throughout all aspects of our school, and are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based PSHE and RSE using the Coram SCARF materials, delivered in regularly timetabled lessons and reinforced throughout the whole curriculum and in assemblies.

This has been developed to be age appropriate (especially when considering the needs of children with SEND and other vulnerabilities) and will cover issues such as:

- healthy and respectful relationships both in the real and virtual worlds
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Early Help / Common Assessment Framework

The school contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children (DfE, 2018). This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

The school will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The model sets out a single assessment, planning and review pathway for all children and young people, ensuring that needs are identified earlier and addressed on a multi-agency basis, the Common Assessment Framework (CAF)

The DSL, in consultation with the CAF Lead, will keep CAF cases under constant review and the school will consider a referral to Bromley Children's Social Care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed and reported to the CAF Team in Bromley. At risk groups include:

- Young Carers
- Children with SEND
- Pupils with Health Conditions
- Pupils with Mental Health Needs
- Pupils with a family member in prison or who are affected by parental offending
- Pupils at risk of honour-based abuse (such as FGM or Forced Marriage)
- Pupils who are constantly absent from school, including persistent absences for part of the school day.

Children Missing in Education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Guidance on school attendance '[Working together to improve school attendance](#)' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns. There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with

respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

As part of their safeguarding training, staff awareness is drawn to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

Non-collection of children

If a child is not collected at the end of the session/day, they will be taken to Main Reception. We will call around all contacts in the first instance. If this does not result in the child being collected, we will advise contacts that if the child is not collected within 30 minutes of the end of the school day, then social services will be contacted.

Regular and punctual attendance at school is vitally important at Valley Primary School. Knowing where pupils are during school hours of term time is an extremely important aspect of safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues including the criminal exploitation of pupils. The school sets a target of 97% attendance and poor or irregular attendance is addressed without delay by the Head Teacher, Attendance Officer and the school's designated Education Welfare Officer (EWO).

The school holds at least two emergency contact numbers for each pupil and these are recorded on Arbor the school information system. Parents are asked to check the accuracy of these details twice yearly in September and February.

The school operates a three-tier letter system to inform parents of decreasing school attendance. The first letter is sent when a child's attendance falls to 93% with a second letter sent if no improvement is seen or attendance falls further. The EWO will become involved when a child's attendance falls to 91% or below.

The school adopts the following procedures to minimise the risk of children going missing in education:

- First Day absence Calling;
- Address, contact details and outbound and inbound flight details for families returning home for extended periods;
- Enrolling and off-rolling confirmed with the Local Authority;
- Safeguarding Check Letters sent to previous school upon induction of a new pupil;
- Telephone call made to pupil's new school to ensure their attendance at the new school.

If the school is unable to confirm the whereabouts of a child following the first day absence call, staff will use all means possible to locate the child and ascertain their safety. The Bromley Children Missing Education and Off-Rolling Procedure will be used. School staff will contact the Local Authority promptly when a child is missing from school in the following circumstances:

- The child may be a victim of crime;
- The child is subject to a Child Protection Plan;
- The child is subject to S47 enquiries;
- The child is looked after;
- There is a known person posing risk to the child;
- There is a history of the family moving frequently;
- There are serious issues of attendance.

Bromley Contact for Children Missing in Education (CME):

Education.eduwelfare@bromley.gov

Tel: 0208 313 4170

In all cases of CME, school staff will consult the Bromley Procedure for Schools (**Appendix 1**)

Elective Home Schooling

There are many reasons why parents / carer might elect to home school their children. Whenever a parent / carer has expressed their intention to remove their child from school with a view to educating at home, Valley Primary School will notify the local authority as part of their off-rolling procedures. This is particularly important if the child has SEND or an allocated social worker.

Whenever possible, before any final decision are made, the school will recommend a meeting with parents / carers, a representative from the local authority and other relevant professionals to ensure that any decision to home educate is taken in the best interests of the child(ren).

Private Fostering

All staff are educated about private fostering as part of their annual safeguarding update training. Staff are also aware that there is a mandatory duty to inform the Local Authority about all children in a private fostering arrangement.

Private Fostering is defined in the following way:

When a child under the age of 16 (or 18 if they are disabled) is cared for by someone who is not their parent or a close relative for 28 days or more.

A close relative is defined as step-parents, grandparents, brothers, sisters, uncles or aunts. Great aunts or uncles, great grandparents and cousins do not fall into the category of being a close relative.

To qualify as private fostering, the arrangement has not been made by the local authority and the child or young person is not being looked after by an approved foster carer.

Once a staff member becomes aware of a private fostering arrangement, it should be brought to the attention of the DSL who will then contact the MASH Team or Bromley's Lead Professional, Godwin Munzara on 0208 461 7843 or godwin.munzara@bromley.gov.uk

Homelessness

Valley staff are aware that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Staff will work with families at the earliest opportunity when there is a risk of homelessness and the DSL will liaise with Bromley Housing: housing.options@bromley.gov.uk Tel: 020 8461 772.

Indicators that a family may be at risk of homelessness include:

- Household Debt
- Rent Arrears
- Domestic Abuse
- Anti-Social Behaviour
- Request to Vacate the Property

Whilst referrals and discussions with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral to Children's Social Care where a child has been harmed or is at risk of harm.

7. Signs and Behaviour of Abuse

All staff and volunteers must be aware that the four main categories of abuse which may result in a child being placed on the Child Protection Register are:

- Physical abuse
- Emotional abuse

- Sexual abuse
- Neglect

When discussing concerns about a child, in order to gain a full picture of their need and the appropriate next steps, staff will consult the Bromley Threshold of Need.

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

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

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

Sexual abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse).

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

Indicators of Abuse

NB: This guidance is provided as a useful reminder of the indicators of abuse but should always be considered within the context of a comprehensive training programme and not as a substitute for more in depth consideration.

Indicators of Physical Abuse

Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Unexplained injuries including burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches
- Withdrawal from physical contact

- Arms and legs covered, even in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Running away

Indicators of Emotional Abuse

Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Physical and/or mental and/or emotional development lags
- Admission of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour eg. thumb sucking, hair twisting, rocking
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing or scavenging.

Indicators of Sexual Abuse

Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Sudden changes in behaviour or in school performance
- Displays of affection in a sexual way, inappropriate to age
- Tendency to cling or need reassurance
- Regression to younger behaviour eg. thumb sucking, acting like a baby, playing with discarded toys
- Complaints of genital itching or pain, or anal pain
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Apparent secrecy
- Bedwetting, daytime wetting and/or soiling
- Sleep disturbances, nightmares
- Chronic illness, eg. throat infection, venereal disease or other STD
- Anorexia, bulimia
- Unexplained pregnancy
- Fear of undressing, eg. for sport
- Phobias or panic attacks
- Child Sexual Exploitation (please see separate section in this policy)

Indicators of Neglect

Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Constant hunger

- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging

Specific safeguarding issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on its own website www.nspcc.org.uk Schools and colleges can also access broad government guidance on the issues listed below by referring to Annex B of Keeping Children Safe in Education (2023):

- Children and the Court System
- Children Missing from Education
- Children with Family Members in Prison
- Child Criminal Exploitation
- Child Sexual Exploitation
- County Lines
- Domestic Abuse
- Homelessness
- So-called Honour-Based Abuse (including Female Genital Mutilation and Forced Marriage)
- Preventing Radicalisation
- The Prevent Duty
- Channel
- Child-on-Child Abuse
- Sexual Violence and Sexual Harassment
- Upskirting

Further information on Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) and Female Genital Mutilation

Child Sexual Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The following factors were identified as making children vulnerable to abuse:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental

- health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Please read Bromley's CSE Warning Signs prompt sheets (**Appendices 2&3**)

Child Criminal Exploitation

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

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

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. FGM typically

takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or sister who has undergone FGM
- girls who are withdrawn from PHSCE lessons in school
- visiting female elder from an at-risk country
- being taken on a long holiday to an at-risk country
- talk about a 'special' procedure to become a woman

Signs and symptoms of FGM

FGM may be likely if there is a visiting female elder, talk of a special procedure or celebration to become a woman, or parents wishing to take their daughter out of school to an 'at-risk' country (especially before the summer holiday) or parent who wish to withdraw their daughter from lesson where pupils learn about FGM. Staff should not assume that FGM only happens outside of the UK

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from the classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (eg withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear
- talking about pain or discomfort between her legs.

At risk countries include:

Burkina Faso, Djibouti, Egypt, Eritrea, Ethiopia, The Gambia, Guinea, Liberia, Mali, Mauritania, Sierra Leone, Somalia, Sudan, Indonesia, Kuwait, Malaysia, Oman, Yemen and the United Arab Emirates.

Actions

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
 - Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
- must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015 and these procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

Mandatory Reporting Duty

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have

been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve local authority children’s social care as appropriate.

The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over.

Further information on when and how to make a report can be found at:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Radicalisation and Extremism

The Counter Terrorism & Security Act (2015) & the Prevent duty

Prevent is one of the four elements of CONTEST, the government’s counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

The Counter Terrorism & Security Act (2015):

This Act places a duty on specified authorities including schools, Further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty).

At Valley Primary School, we are committed to supporting vulnerable students through our safeguarding policies and procedures and recognise that this will support the school's contribution to the Prevent duty.

We build pupils' resilience to radicalisation by promoting Fundamental British Values and enabling our pupils to challenge extremist views.

The school engages positively with appropriate training to ensure all staff have the skills and knowledge to refer any concerns appropriately.

Referral for any issue concerning potential radicalisation to extremism should be managed as any other safeguarding referral. The Head Teacher provides the lead for the school on Prevent and can be contacted directly for any concerns or for clarification on process.

Valley Primary School is committed to working closely and in harmony with its community and celebrating the diversity of the UK. We aim to prepare children for life in modern Britain and to ensure that our school ethos, curriculum and approaches to teaching and learning reflect and promote British values and promote the school's Core Values.

We recognise that these values are not exclusive to being British and that they have come to be accepted throughout the democratic world as the method of creating an orderly society in which individual members can feel safe, valued and can contribute to for the good of themselves and others.

We work alongside our local community and recognise the variety of religious beliefs within it and those of no faith. We take children outside the school to take part in local events and meet different members of the community to appreciate the valuable contributions they make.

We take opportunities to:

- acknowledge, celebrate and commemorate national events and anniversaries related to key events in Britain's past
- join in with international sporting events and find out more about the countries that host them
- support a number of charities that are selected by the children and arrange fundraising events
- invite members of the local community to our school events.

We understand the role that our school has in helping prevent radicalisation and supporting our children in developing a world view recognising Britain's place within it. The four British values are:

- democracy
- the rule of law
- individual liberty
- mutual respect and tolerance of those with different faiths and beliefs

Please refer to the school's Prevent Policy to learn more about how we safeguard pupils and staff from extremism and radicalisation and promote Fundamental British Values.

Gangs

What is a gang?

The term 'gang' means different things to different people. A group of young people hanging out together does not make a gang. A gang is usually considered to be a group of people who spend time in public places that also:

- see themselves (and are seen by others) as a noticeable group, and
- engage in a range of criminal activity and violence.

They may also have any or all of the following features

- identify with or lay a claim over territory,
- or are in conflict with other, similar gangs.

A criminal network however is different from a gang; it's a group of individuals involved in persistent criminality for some form of personal gain (this includes profit and/or to gain or demonstrate status) which is causing significant harm to the community. It is:

- a group that keeps breaking the law to make money. This law-breaking is causing harm to the community
- or, this law-breaking is a problem internationally (e.g. people trafficking)
- Violence is used in order to make money (e.g. to scare people into giving them money)
- They are running an illegal business (e.g. drug trafficking)

Why do people belong to gangs?

Young people might join a gang for the following reasons:

- identity
- a sense of belonging
- they think it will make them safer
- they think they will make money
- they are forced in to joining (blackmailed or coerced)

Children and young people involved with, or on the edges of, gangs might be victims of violence or they might be pressured into doing things like stealing or carrying drugs or weapons. Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. They might be abused, exploited or put into dangerous situations. Initiation in to gangs is often a form of abuse, often sexual.

Key to identifying potential involvement in county lines are missing episodes where the victim may have been trafficked for the purpose of transporting drugs.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, young people or adults;

- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

How can you help a child involved in a gang?

You can call Childline on **0800 1111** for support and advice - it's a free 24/7 confidential helpline for children and young people - or they can access more information about gangs on the [Childline website](#)

The Metropolitan Police's [Safe](#) website has information about exiting gangs and advice and guidance about group violence and what to do if you are being pressured to join a gang.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes from both home and school when the person may have been trafficked for the purpose of transporting drugs.

If there are concerns that a child might be involved in county lines activity, a safeguarding referral should be considered to Bromley Children's Social Care and/or the [National Referral Mechanism](#). The school should also consider seeking the advice and support from relevant local services and sector providers.

Domestic Abuse

Domestic abuse affects people of every class, age, race, disability, gender and sexuality. The abuse can begin at any stage of a relationship and may continue after the relationship has ended.

Children who witness domestic abuse, whether in the family setting or outside the immediate family, are also victims as this can have a lasting effect on children. They may see, hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse)/ This can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#)

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and

(e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

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

There are a number of services available in Bromley to support women and children facing domestic abuse:

Bromley Domestic Abuse Services

These national organisations offer support and advice:

Women's Aid, National Domestic Violence Helpline, Refuge

Online Safety / Cyber Crime

All staff are aware that technology is a significant component in many safeguarding issues and that abuse can happen in both the real and virtual worlds. Valley Primary School has a separate E-safety policy which addresses the school's approach to teaching about the safe and appropriate use of technology.

Children who are particularly skilled in computing and technology may be drawn into Cybercrime, either deliberately or inadvertently. Cybercrime is defined as criminal activity committed using computers and/or the internet. This includes activities such as hacking, 'denial of service' attacks (where a website is made unavailable), creating and using malware, such as viruses.

We understand that children with special educational needs or disabilities (SEND), or certain medical or physical health conditions can face additional barriers, including cognitive understanding (being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges, or the consequences of doing so).

A continuous online safety programme is delivered at Valley as part of the computing curriculum which educates pupils in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

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

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel our pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

As a result of the pandemic, from time to time, learning at Valley has to move online. When this happens the resources used must all comply with the Trust GDPR requirements. As part of the online planning process we

must ensure children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. As well as reporting routes back to the school this should also signpost children to age appropriate practical support from the likes of:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content
- [CEOP](#) - for advice on making a report about online abuse

Online-safety is regularly referenced in whole school assemblies and throughout the curriculum.

We are in regular contact with parents and carers, for example through weekly newsletters and also through the home learning being set each week. We should use our lines of communication to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school their child is going to be interacting with online.

Parents and carers may well be looking for other support from the many companies offering tuition. Schools must advise parents of the need to use reputable providers who can evidence their online safety and credentials for having access to children. Schools should signpost parents and carers to the following support:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and carers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers

Updates for keeping safe online are published on the school website for parent access with details for reporting online abuse.

New Migrant Families

Additional processes have been put in place by the local authority to smooth the transition into school of children from migrant families entering the UK in the light of the Ukrainian crisis. The DSL will work with the local authority when the children start school and will work with the parents and an interpreter to obtain background information where this is appropriate.

We will be aware that the child may have witnessed traumatic events, and may be separated from members of the family who remain in the Ukraine.

Harmful Cultural Practices

The London Safeguarding Children Board has developed practice guidance linked to faith or culture, providing guidance for professionals on how to promote and protect the welfare of children living in circumstances which appear to be complex because of their faith and culture.

Harmful practices include FGM (female genital mutilation), so-called honour-based abuse, forced marriage, male circumcision, and belief in spirit possession and witchcraft.

Children and young people can be at risk of significant harm (including of death) and any referrals should be made to MASH citing the harmful cultural practice that the child or young person is at risk of. As with all child abuse concerns, if you think a child is in immediate danger, always call 999.

Honour Based Abuse

So called “honour-crime”, “honour-based abuse” or “izzat” (mainly a South Asian term) embrace a variety of crimes of violence mainly perpetrated towards girls and women, including assault, imprisonment and murder where the person is being punished by their family or their community. The family or community are punishing them for undermining what they believe to be the correct code of behaviour.

Failure to adhere to the correct code of behaviour is an indicator to the family that the person cannot be controlled to conform and this brings “shame” to the family.

“Honour-based violence” usually occurs with some degree of approval by family and/ community members and it has an international dimension as victims can be taken overseas where the violence is then perpetrated. It can also be a trigger for a forced marriage.

Honour based violence cuts across all cultures and communities, and cases encountered in the UK have involved families from Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European communities. This is not an exhaustive list.

Female Genital Mutilation

Please read the separate section on FGM within this policy.

Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into marriage. Threats can be physical or emotional and psychological.

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

Hundreds of people in the UK (particularly girls and young women), some as young as nine, are forced into marriage each year. A 'forced' marriage, as distinct from a consensual 'arranged' one, is a marriage conducted without the full consent of both parties and where duress is a factor. Duress cannot be justified on religious or cultural grounds.

In 2004, the Government's definition of domestic violence was extended to include acts perpetrated by extended family members as well as intimate partners. Consequently, acts such as forced marriage and so-called 'honour crimes' (which can include abduction and homicide) now come under the definition of domestic violence.

The majority of forced marriages reported to date in the UK have involved families from South Asia; other communities in which there have been cases include Europe, East Asia, the Middle East and Africa. Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas or a British national being taken abroad.

Professionals should respond in a similar way to forced marriage as with domestic violence and honour-based abuse (i.e. in facilitating disclosure, developing individual safety plans, ensuring the child's safety by affording them confidentiality in relation to the rest of the family, completing individual risk assessments etc). Staff should inform the DSL immediately whenever they have concerns relating to forced marriage. The DSL will:

- Speak to the pupil about the concerns in a secure and private room at school;
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer;
- Seek advice from the Forced Marriage Unit on 0207 008 0151 of fmf@fco.gov.uk
- Refer the pupil to the relevant professionals for pastoral / welfare support

Breast Ironing

Breast ironing involves hot pestles, stones or other implements being rubbed on to the developing breasts of young girls in an attempt to stop them from growing further. The practice of breast ironing is seen as a protection for girls by making them child-like for longer therefore reducing the risk of pregnancy. This practice normally occurs in girls between the ages of 9 and 15 and is usually carried out by the mother or grandmother. Breast ironing is a form of physical abuse and is condemned by the United Nations. The at-risk countries are listed below but staff at Valley are made aware that this practice can happen anywhere in the UK.

At-risk countries for breast ironing include:

Benin, Cameroon, Chad, Ivory Coast, Kenya and Zimbabwe

Male circumcision

Male circumcision that is performed for any reason other than physical clinical need is termed non-therapeutic circumcision. The British Association of Paediatric Surgeons advises that there is rarely a clinical indication for circumcision. Doctors should be aware of this and reassure parents accordingly. Doctors / health professionals should ensure that any parents seeking circumcision for their son in the belief that it confers health benefits are fully informed that there is a lack of professional consensus as to current evidence demonstrating any benefits. The risks / benefits to the child must be fully explained to the parents and to the young man himself if he has the maturity to make his own decisions and understand the implications of those decisions (Fraser Guidelines/ Gillick competency).

The medical harms or benefits have not been unequivocally proven except to the extent that there are clear risks of harm if the procedure is done inexpertly.

The legal position on male circumcision is untested and therefore remains unclear. Professionals should be guided by the London Child Protection Procedures Part B Practice guidance on male circumcision.

Belief in spirit possession or witchcraft

This harmful cultural practice is where parents, families and often the child themselves believe that an evil force has entered a child and is controlling them; the belief includes the child being able to use the evil force to harm others. This evil is variously known as black magic, kindoki, ndoki, the evil eye, djinns, voodoo, obeah. Children are called witches or sorcerers.

Parents can be initiated into and / or supported in the belief that their child is possessed by an evil spirit by a privately contacted spiritualist / indigenous healer or by a local community faith leader. The task of exorcism or deliverance is often undertaken by a faith leader, or by the parents or other family members.

Forms of abuse can include physical, sexual, emotional and/or neglect. In addition, significant harm may occur when an attempt is made to 'exorcise; or 'deliver' the evil spirit from the child.

The London Child Protection Procedures Practice Guidance on spiritual, cultural and religious beliefs should be followed. The London Safeguarding Children Board website also has information in the section Resources about Culture and Faith.

Current guidelines for praying for children and engaging with them in a faith context are available in the 'Staying Safe and Secure' booklet, available at: www.ccpas.co.uk, produced by the Churches' Child Protection Advisory Service (CCPAS) and the Metropolitan Police. Whilst the booklet is specifically for Christian communities, the principles it sets out for safeguarding children are the same across all faith communities and can be adapted accordingly.

Child on Child Abuse.

As part of the school's annual safeguarding updates, all staff are made aware of the fact that children may be harmed by other children or young people. Staff at Valley Primary School are clear that abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.

At Valley, we adopt a zero-tolerance approach to sexual violence and sexual harassment, because we recognise that failure to do so can lead to a culture of unacceptable behaviour and in the worst case scenario, a culture that normalises abuse.

We recognise that even if there are no reports, it doesn't mean it's not happening

We will always challenge physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Similarly, whenever a child makes a disclosure of any sort but particularly relating to child-on-child abuse, staff should reassure victims that they are being taken seriously and that they are supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Any reported incident of abuse involving a pupil with SEND will require close liaison with the SENCo.

Being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

Children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Staff at Valley will strive to create a safe space for children to talk about and share their concerns.

LGBT inclusion forms part of the statutory Relationships curriculum and there is a range of support available to schools to counter homophobic, bi-phobic and transphobic bullying and abuse.

Child-on-Child abuse can take many forms such as (but not limited to):

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)
- Upskirting which typically involves taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause humiliation, distress or alarm

- Initiation / hazing type violence and rituals (this could include involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include on inline element).

Appropriate and inappropriate sexual behaviour amongst children is defined using the Brook Sexual Behaviours Traffic Light Tool (**Appendices 4, 5 & 6**)

Sexual Violence

Sexual violence can be described as:

- Rape
- Assault by Penetration
- Sexual Assault – Person A commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents
- Causing someone to engage in sexual activity without consent – Person A commits an offence if s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually or to engage on sexual activity with a third party.

What is Consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort or sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape

The following website has useful information when discussing consent with pupils and families. Staff will first need to consider the age and developmental stage of the child or group of children before using material from the site: <http://www.consentiseverything.com/#Home>

Sexual Harassment

Sexual harassment can be defined as ‘unwanted contact of a sexual nature’ that can occur online and offline. Child-on-Child sexual harassment is likely to violate a child’s dignity and /or make them feel intimidated, degraded or humiliated and / or create a hostile, offensive or sexualised environment. Sexual harassment can include:

- Sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual jokes or taunting
- Physical behaviour such as deliberately brushing against someone, interfering with someone’s clothes (schools should consider when any of this crosses a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature

Online Sexual Harassment

Online sexual harassment may be standalone or part of a wider pattern of sexual harassment and / or sexual violence. It may include:

- Consensual or non-consensual sharing of nudes and semi-nude images and or videos
- Sharing of unwanted explicit content
- Sexualised online bullying
- Unwanted sexual comments and messages including on social media
- Sexual exploitation, coercion and threats

- Upskirting

The Voyeurism (offences) Act 2019 criminalises the act of ‘upskirting’. The Criminal Prosecution Service (CPS) defines ‘upskirting’ as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission.

It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places which can make it difficult to notice offenders.

Dealing with Incidents of Child-on-Child Abuse

Incidents of Child-on-Child abuse will be treated in exactly the same way as any form of abuse. Staff should report any concerns or reported incidences of child-on-child abuse to one of the school’s Designated Safeguarding Leads.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged instigator. We will ask the police if we have any questions about the investigation.

Like with any other disclosure, staff will:

- Listen to the child and offer reassurance without promising confidentiality
- Not cross examine the child
- Record the facts as they are reported on Safeguard and alert the school’s DSLs to this record
- Offer the relevant support to the victim and perpetrator and their respective families
- Carry out searches or confiscations as appropriate in line with DfE guidance
- Discuss the disclosure with the MASH Team at Bromley Children’s Social Care and / or the police where appropriate
- Where necessary implement a risk assessment to minimise risk and address the ongoing needs of the victim, the alleged perpetrator, other pupils and members of the school community.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s) whilst at the same time offering the necessary support to all parties.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a sanction accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this;
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

Responding to reports of sexual violence and sexual harassment

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children’s social care, and
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is 10, if the alleged instigator is under 10, the starting principle of referring to the police remains.
- We will (in most cases) engage with both the victim’s and alleged instigator’s parents or carers when there’s been a report of sexual violence (this might not be necessary in relation to sexual harassment, but decide it on a case-by-case basis)

- The exception is if there is reason to believe informing a parent or carer will put the child at additional risk
- We will carefully consider what information to provide about the other child involved, and when, making sure that we work with relevant agencies to ensure our approach to information sharing is consistent.

It's good practice to:

- Meet the victim's parent or carers with the victim to discuss what's being put in place to safeguard and support them, and how the report will progress;
- Meet with the alleged instigator's parents or carers to discuss what is being put in place that will impact them, e.g. moving them out of classes with the victim. You should explain the reason behind any decision;
- The DSL or DDSL would attend these meetings, deciding what other agencies should attend on a case-by-case basis;
- We will provide support to children who have witnessed sexual violence, especially rape and assault by penetration;
- We will aim to ensure the victim, alleged instigator(s) and any witnesses are not encounter bullying and harassment as a result of any disclosures made.

Young people who display such behaviour may be victims of abuse themselves and the normal child protection procedures will be followed for both victim and perpetrator. Safeguarding incidents and or behaviours can be associated with factors outside of the school and can occur between children outside the school. All staff but especially the DSL should consider the context within which such incidents and or behaviours occur (contextual safeguarding) and an assessment should be carried out to establish as to whether the wider environmental factors present in the child's life are a threat to their safety or welfare. The DSL should gather as much information as possible in readiness to share this with Bromley Children's Social Care in order for a fuller assessment to be carried out on the child and his/her family.

Other factors to consider when responding to reports of sexual violence or sexual harassment are:

- The wishes of the victim in terms of how they wish to proceed (this should never compromise the school's position to share information in order to safeguard children and young people)
- The nature of the alleged incident including whether a crime has been committed
- The right for anonymity especially when an allegation is progressing through the criminal justice system
- The age of the children involved along with their developmental stage
- Any imbalance of power between the children eg is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- Is the alleged incident a one-off or a sustained pattern of abuse?
- The potential need to keep the victim and perpetrator separated
- The terminology used to describe the alleged perpetrator or perpetrators
- The balance between support and the consequence / sanction for the perpetrator. All sanctions should be considered on a case-by-case basis
- The protection of the perpetrator against bullying or revenge attacks

In order to build pupils' awareness of and resilience to Child-on-Child abuse, the school deliver:

- A graduated Relationships curriculum from Reception through to Year 6 where there is a clear focus on relationships and the difference between healthy and unhealthy relationships along with a separate curriculum for Sex Education
- The NSPCC Pants Rule and Speak Out Stay Safe programmes
- A programme of PHSE which links to Fundamental British Values, the school's Core Values and regularly discuss cultural diversity, inclusivity and mutual respect

We will minimise the risk of Child-on-Child abuse or harassment (including sexual) by:

- Challenging any form of derogatory or sexualised language or behaviour

- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing or up-skirting (including down blousing) towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent (RSHE education)
- Ensuring pupils know they can talk to staff confidentially through regularly reinforcing this message and talking to the children, for example in assemblies and circle time and understand their role in preventing and responding where they believe a child may be at risk
- Ensure staff reassure victims that they are being taken seriously
- Being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Ensuring staff are trained to understand that a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse. We have a zero tolerance culture towards homophobia, biphobia and transphobia.

Responding to the sharing of nude or semi-nude imagery

Nudes and semi-nudes can be shared by, and between, children and young people under a wide range of circumstances which are often not sexually or criminally motivated. The school's response to individual incidences will depend on the motivations behind the incident and the appropriateness of the child or young person's behaviour. In order to define each incident the following flow chart will be used:

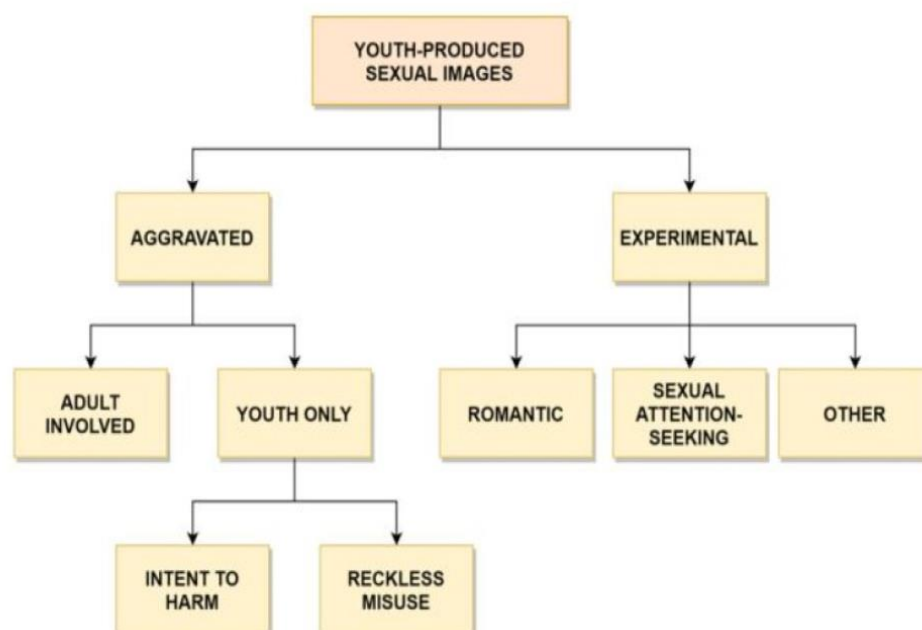


Fig 1: Sexting, a typology (Finkelhor & Wolak)

Aggravated

Incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can be sub-categorised into:

- Adult Involved** – adult offenders attempt to develop relationships by grooming children and young people in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family, friends, relatives, community members or contacted via the Internet. The images may be solicited by adult offenders
- Youth Only (Intent to Harm)** – these cases can arise from interpersonal conflict such as break-ups and fights among friends, or criminal / abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people.
- Youth Only (Reckless Misuse)** – no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is picture. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.

Experimental

Incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can be further sub-categorised into:

- Romantic** – incidents in which young people in ongoing relationships make images for themselves or each other and images were not intended to be distributed beyond the pair.
- Sexual Attention Seeking** – the phrase ‘sexual attention seeking’ is taken directly from the typology however it is important to note that incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking or sharing their image.
- Other** – cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse but also do not fit the romantic or attention seeking sub-types. These involve children or young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who do not appear to have sexual motives.

Initial Response

When an incident involving nudes or semi-nude imagery comes to the attention of a member of staff, the following should happen:

- The incident should be referred to the DSL or Deputy DSL as soon as possible
- The DSL or DDSL should hold an initial review meeting with appropriate staff. This might include the staff member who received or heard the disclosure along with other members of the senior leadership team
- There should be subsequent interviews with the children or young people involved (if appropriate)
- Parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there are good reason to believe that involving the parents would put the child or young person at risk of harm
- A referral should be made to the police or social care immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process.

Initial Review Meeting

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

- Whether there is an immediate risk to any child or young person
- If a referral should be made to the police or social care
- If it is necessary to view the image(s) in order to safeguard the child or young person – in most cases, images or videos should not be viewed.
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services or platforms – this may be unknown.
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the children or young people involved which would influence a risk assessment
- If there is a need to contact another educational setting or individual

- Whether to contact parents or carers of the children or young people involved – in most cases they should be involved

Immediate Referral to the Police or Social Care

An immediate referral should be made to the police and / or social care at the initial stage when:

- The incident involves an adult
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed or there are concerns about their capacity to consent (for example as a result of SEND)
- What you know about the images or videos suggest the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The images involve sexual acts and any child or young person in the images or videos is under the age of 13yrs
- You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes / semi-nude images for example they are presenting as suicidal or self-harming.

If none of the above apply, the school may decide to respond to the incident without involving the police or social care. The school can still choose to escalate at any time if further information / concerns are disclosed at a later stage.

The decision to respond to an incident without involving the police or children's social care should only be made in cases where the DSL or Deputy DSL is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the school setting through the pastoral support or behaviour policy and, where necessary, the local network of support.

The decision should be made and recorded in line with the school's safeguarding procedures and should be made based on the best interests of the child or young person involved. The decision should take into account the proportionality as well as the welfare and protection of any child or young person. The decision should be continually reviewed throughout the process of responding to the incident.

If doubts remain after following child protection procedures, local safeguarding arrangements should be followed. Further guidance can be found at:

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

8. Online Abuse and Cybercrime: Mobile Technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 Key Categories of Risk

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year. All staff will also receive cyber safety training annually.

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

Make all pupils, parents/carers, staff, volunteers and Governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's [guidance on searching, screening and confiscation](#)

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on the school website. The Head Teacher is responsible for overseeing the safe use of mobile phones and technology in Early Years.

All staff are aware that technology is a significant component in many safeguarding issues and that abuse can happen online, offline or both (see above Child-on-Child abuse and E Safety Policy). Staff are aware that some groups of children are potentially at more risk of harm than others, including online harm.

Children who are particularly skilled in computing and technology may be drawn into Cybercrime, either deliberately or inadvertently. Cybercrime is defined as criminal activity committed using computers and/or the internet. This includes activities such as hacking, 'denial of service' attacks (where a website is made unavailable), creating and using malware, such as viruses.

We understand that children with special educational needs or disabilities (SEND), or certain medical or physical health conditions can face additional barriers, including cognitive understanding (being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges, or the consequences of doing so).

Mobile phones, cameras and technology

Staff are allowed to bring their personal phones to school for their own use but will limit such use to *non-contact time* when pupils are *not* present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. **Staff will not take pictures or recordings of pupils on their personal phones or cameras.**

We will follow the General Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Visitors will be made aware that they should not use mobile phones whilst on site, and that under no circumstances should they take photographs.

9. Pupils with Special Educational Needs (SEN)

At Valley Primary School, the Governors and staff understand that children with special educational needs or other health conditions can be faced with additional safeguarding challenges and are 3 times more likely to be abused than their peers.

The possible additional barriers to recognising abuse or neglect in pupils with SEN include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or additional need without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- children with SEN and disabilities can be disproportionately impacted by things like bullying without showing any outward signs;

- communication barriers and difficulties in overcoming these barriers.

To avoid the abuse or neglect of pupils with SEN going unnoticed, the following procedures are in place:

- during the weekly safeguarding briefings, staff are challenged to clarify their concerns when discussing pupils with SEN as to whether concerning behaviour is linked to the disability or additional need or the result of abuse;
- Pupils with SEN who are subject to an Individual Provision Map (IPM), communicate their feelings about themselves and school through the termly review of the their IPM;
- Pupils are encouraged to talk to staff members about any concerns they might have and are free to communicate their concerns through the worry box system in pictorial form.

10. The Use of Reasonable Force

Staff at Valley Primary School are aware that, from time to time, circumstances arise when it is appropriate to use reasonable force to safeguard children, young people and staff. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of reasonable force may involve either passive physical contact such as standing between pupils or blocking a pupil's path or active physical contact such as leading a pupil away from an incident by the arm.

For pupils who display challenging behaviour whether as a result of SEN, disability or a medical condition, the school will look to offer support through making reasonable adjustments and the planning of positive, proactive behaviour support through the completion of an Individual Behaviour Plan which will be drawn up in consultation with the pupil, parents, staff and other relevant support professionals.

When dealing with extreme cases, staff who have received Positive Handling Training should be called to assist with pupils displaying challenging behaviour.

11. The Safeguarding of Looked After Children (LAC)

At Valley Primary School, it is recognised that the most common reason for children becoming looked after is as a result of abuse and / or neglect.

The Governing Body ensure that staff receive attachment training and other suitably appropriate training in order to raise awareness of the additional needs and behaviours of children who are looked after.

The **Head Teacher** is the Designated Teacher for Looked-After and Previously Looked-After and is responsible for:

- Liaising with the Virtual Head Teacher to promote the educational achievement of children who are looked after;
- Liaising with the Virtual Head to agree appropriate provision and the spending of Pupil Premium Plus funding;
- Liaise with the Virtual Head Teacher to to promote the educational achievement for Previously Looked-After pupils;
- Sharing the necessary information with relevant staff relating to the child's looked after status and contact arrangements with birth parents or those with parental responsibility.

12. Emotional Wellbeing and Mental Health

At Valley, staff are aware that mental ill-health can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also educated about adverse childhood experiences and how these can have a lasting negative impact throughout childhood, adolescence and adulthood and can affect mental health, behaviour and education.

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

Staff should speak to the DSL or Deputy DSL to discuss any concerns they have and log their observations on Safeguard. Staff who have concerns relating to the mental health of a pupil who is also a safeguarding concern should speak to the DSL immediately.

The Community Wellbeing Service is the single point of access service for children and young people's emotional and mental wellbeing in the borough. Children and young people are referred in (or can self-refer), their difficulties are screened and it is then decided how best they can be supported. This could be through therapeutic support or signposting to a more appropriate local service.

When concerns arise relating to bullying, eating problems, family problems, depression, behaviour problems or anger, **Mrs Coulson**, the school's designated teacher for Mental Health and Pupil Wellbeing should be contacted in the first instance. The Community Wellbeing Service using the details below. **Self-referrals are accepted.**

Email: info@bromleyy.org

Secure NHS email: BROMH.bromleyy@nhs.net

Phone: 020 3770 8848

Web Link: www.bromleywellbeingcyp.org

Another excellent site for advice and support is [Young Minds](http://www.youngminds.org.uk) .

If you need more specialist mental health support, then the Community Wellbeing Service will refer you to Bromley CAMHS (run by [Oxleas](http://www.oxleas.nhs.uk) NHS Trust). Their website contains useful information about what to expect when you visit as well as strategies and guidance.

13. Pupils with an allocated Social Worker

Staff at Valley Primary School recognise that when a pupil has a social worker it is a potential indicator that the pupils is more at risk than other pupils. This may mean that they are more at risk to further harm as well as facing education barriers to attendance, learning, behaviour and poor mental health.

When working with pupils who have an allocated social worker, the school will:

- Deploy a member of the Senior Leadership Team to oversee the plans for the pupil;
- Work with the social work team and other relevant agencies to ensure the pupil's needs are taken into account when making plans;
- Champion the pupil and ensure their voice is heard throughout the period of support;
- Support the family as a whole to ensure the best possible outcomes for the pupil.

Virtual School Head Teachers have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

14. Dealing with Disclosures

Staff at Valley are aware that pupils might not feel ready or know how to tell someone that they are being abused, exploited or neglected. Some pupils might not recognise their experiences as harmful or they may feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and /

or language skills. However, this will not stop staff at Valley from exercising their professional curiosity when they have concerns for a pupil and speaking to the DSL about these concerns.

The following list contains a range of reasons why people commonly hesitate to report abuse. It is provided for information, but be aware that none of these reasons is a justification for failing to report a child protection concern or disclosure.

- The child asks you to keep silent – keep a secret
- Fear of breaking up the family
- Fear of exposing the child to further abuse
- Fear of breaking a trusting relationship with child/family
- Painful memories of your own abusive experiences
- Fear of reprisals to yourself/your children/family
- Fear of presenting evidence in court
- Afraid of misinterpreting or overreacting to the situation
- Assuming another agency is dealing with the problem
- The 'rule of optimism' – everything will work out OK
- Assuming one parent/carer will protect
- Believing the child is fantasising/lying
- Being persuaded by the child's retraction
- Allowing a temporary improvement in the child's situation to distract you from the reality of continuing abuse
- Being unable to comprehend the unbelievable nature of the disclosure

WHY CHILDREN CANNOT TELL ABOUT ABUSE

- Threats from abuse – withdrawal of 'favours' or physical threats – may be implicit derived from abuse of power
- Threats from peers also involved in abuse
- May think s/he is to blame and fear arrest
- Fear the loss of the child's world – family, school etc
- May be emotionally dependent on abuser
- May have compartmentalised abuse
- Thinks will not be believed
- Low sense of self-esteem makes disclosure difficult
- May not realise sexual abuse is a crime – thinks it's normal
- May not wish to betray abuser
- May fear exposure and particularly public exposure
- May be ambivalent about sexual identity or feel guilty about taking part in abuse
- Lack of faith in justice system particularly for children with disabilities and from ethnic minorities
- Lack of appropriate language skills

WHY REFER?

- Children have the right to be safe
- Adults have a responsibility to protect children
- Abuse is damaging
- Child abuse exists in a world of secrecy and silence – the cycle of abuse has to be broken
- You only have one small piece of a jigsaw
- Children rarely lie about abuse
- An abuser may well abuse many other children who also have a right to protection

For guidance, advice and support, contact the Bromley MASH Team on: 0208 461 7373 / 7379 / 7026

If any member of staff has a concern that a child in their care has suffered any of these forms of abuse, they must report their concerns to, and seek advice from the Designated Safeguarding Lead, or in his/her absence, the Deputy

Designated Safeguarding Lead, as soon as possible, and never later than the end of the working day. If there is concern as to whether it is safe to allow the child to go home that day, then all effort must be made to inform the Designated Safeguarding Lead immediately so that the Referral and Assessment Service can be informed and the necessary protective measures implemented.

A child may disclose sensitive information at any time of the day, and in particular this may occur outside of normal lesson time, e.g. break periods or during before/after school club sessions. The lead up to holiday periods especially the Christmas and Summer holidays can be an extremely stressful time for families. It is therefore imperative that all members of staff, including external providers are aware of the signs and behaviour which may indicate abuse, as above and fully understand the school's referral process.

All staff must:

- Recognise that a disclosure may come directly from the child, or from a third party, e.g. friend, neighbour, other family member. Alternatively, it may be through the suspicion of staff based on a variety of symptoms and knowledge of possible indicators of abuse
- Take seriously any disclosures made to them and provide reassurance to the discloser through their responses and behaviour.

When receiving a disclosure from a child that he/she has been abused in some way the member of staff must:

- Find time and, if necessary, a suitable place to listen to the child, when information about possible abuse comes to light.
- Listen to what is being said without displaying shock or disbelief.
- Not make false promises which may not be able to be fulfilled and do not promise confidentiality. If the child asks that information is kept secret, it is important that you tell the child in a manner appropriate to the child's age/stage in development that you cannot promise complete confidentiality – instead you must explain that you may need to pass information to other professionals to help keep the child, or other children, safe.
- Allow the child to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify.
- Not criticise the alleged perpetrator.
- Reassure the child that what has happened is not his or her fault.
- Stress that it was the right thing to tell.
- Explain what has to be done next and who has to be told.
- Find out just enough to be sure of the need to refer, and keep any questions open rather than closed. Education is a referrer, not an investigative agency for child protection matters. An incident may eventually end up as a court case and children's evidence can all too easily be compromised by leading questions or repeated recital.
- Make records that are factual, accurate and relevant and avoid subjective judgements. It is not the school's responsibility to 'check out' what any child tells nor should any abuser be questioned.
- Sign and date the record of the disclosure.

The member of staff who has the concern or received the disclosure must report the concern/disclosure to the Designated Safeguarding Lead, or in his/her absence, the Deputy Designated Safeguarding Lead, immediately. The member of staff must provide the DSL with a signed, dated written record of their concern which must be logged on Safeguard. The same approach to receiving a disclosure must be taken if the discloser is not the allegedly abused child but another child or an adult.

The Designated Safeguarding Lead must place the concern on the school's safeguarding file for the child (creating one if necessary). When the Designated Safeguarding Lead, or in his/her absence, the Deputy Designated Safeguarding Lead, has been informed, he/she shall make the decision whether or not to refer the concern to Social Care.

Professionals in all agencies have a responsibility to refer a child to Children's Social Care when it is believed or suspected that the child:

- Has suffered significant harm; or
- Is likely to suffer significant harm.

All referrals to Children’s Social Care must be made in writing using the Multi-Agency Referral Form or CAF assessment where one has been completed. A history of key events is useful when communicating concerns so that any emerging patterns are recognised.

The Referral and Assessment Service will be consulted when there is uncertainty about whether to refer. Referrals must be made as soon as possible and the appropriate forms completed and sent at the same time. Referrals to Children's Social Care must be made to the Referral and Assessment Service at:

Bromley Children’s Social Care Contact Details

MASH Team Phone: 020 8461 7373 / 7379 / 7026

London Borough of Bromley Admin: 0208 461 7309 / 7014 / 7428

Civic Centre, St Blaise E-mail: mash@bromley.gov.uk

Stockwell Close

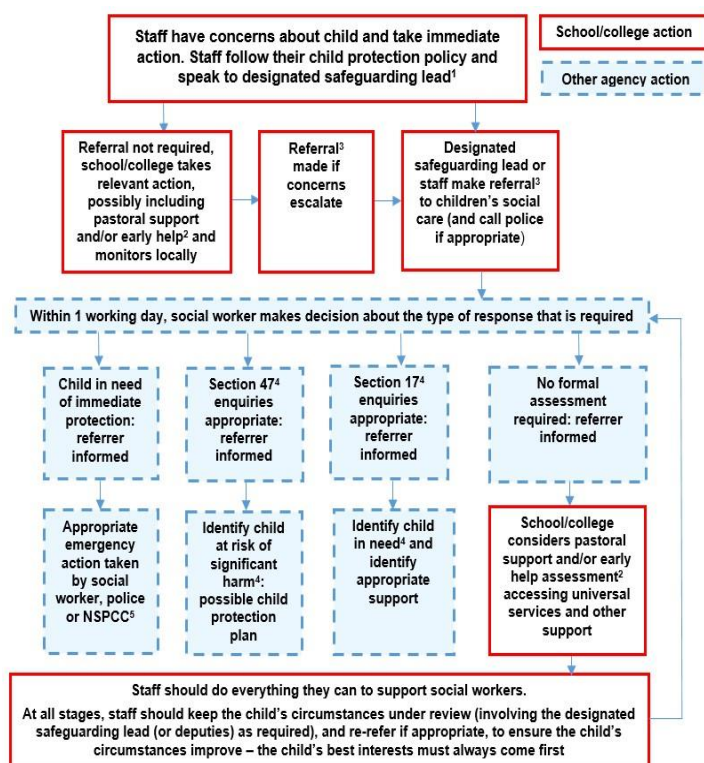
Bromley BR1 3UH Fax: 0208 313 4400

Emergency Duty Team (at weekends and outside normal working hours)

Phone: 0300 303 8671

The Governors and Head Teacher understand that handling disclosures and making referrals can be upsetting and emotionally challenging and will ensure all staff are supported through this process.

When considering any referral, staff at Valley Primary School refer to the ‘Actions where there are concerns about a child’ flow chart as set out in Keeping Children Safe in Education (2023).



15. Confidentiality

Safeguarding information should be treated as confidential and only shared as part of the agreed school and Bromley Safeguarding Partnership protocols. All staff/volunteers in school have a responsibility to share relevant information about the protection of children with other professionals. Staff / volunteers who receive information about children and their families in the course of their work shall only share that information only within appropriate contexts. Staff will be mindful that:

- Timely information sharing is essential for effective safeguarding
- Information must be shared on a need-to-know' basis but you do not need consent to share information if a child is suffering or at risk of serious harm
- Staff should never promise a child that they will not tell anyone about an allegation as this may not be in the child's best interest

Staff will be proactive in sharing information with other agencies and staff are trained with regard to GDPR and understand their duties in relation to this legislation. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe and this includes allowing practitioners to share information without consent.

Wherever possible (and when it won't pose a further risk to the child), parents and carers will be informed of the safeguarding concerns relating to their child and family. In certain circumstances, there may be a need to contact other agencies without first informing parents and carers.

Incidences of Sexual Violence or Sexual Harassment

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. Staff may still lawfully share information if there is another legal basis under the UK GDPR that applies. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children. The DSL should consider:

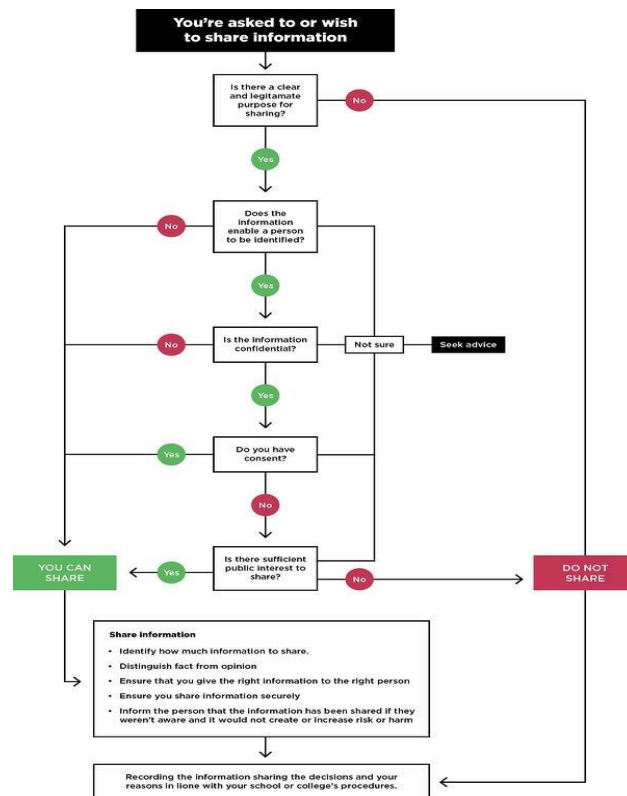
- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged instigator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

1. GDPR isn't a barrier to sharing information
2. Be open and honest
3. Seek advice
4. Share with consent, where appropriate
5. Consider safety and wellbeing
6. Necessary, proportionate, relevant, accurate, timely and secure
7. Keep a record.



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

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, and will consider:

- Awareness of the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- What can be done to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, what information can be shared and any support for the children involved
- The potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises.

16. Recording Keeping

All safeguarding information is recorded on the school's electronic system called Safeguard. Records should include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

All other documentation relating to safeguarding will be kept separately from the child's school file for the duration of the child's time at the school.

When a child changes school the safeguarding files will be sent to the Designated Safeguarding Lead at the receiving school within the following time frames:

- Within 5 days for an in-year transfer;
- Within the first 5 days of the start of a new term

Safeguarding files are sent separately to the child's school file ensuring secure transit. The child's chronology on Safeguard will be sent electronically (via the Safeguard platform) to the DSL at the child's new school. The school will retain a receipt for the records signed by the receiving secondary school. The information contained will be regarded as confidential.

If the concerns are significant or complex, and / or social services are involved, the DSL will speak to the DSL at the receiving school and provide all the necessary information in order for the new school to have the time to make any necessary preparations to ensure the safety of the child.

Any request for access to the information by non-Bromley Safeguarding Children Board Agencies (e.g. Solicitor, investigating agent) will be referred to the Head Teacher/Designated Safeguarding Lead who is advised to seek legal advice before acting.

When pupils join Valley Primary School, the previous school / setting will be contacted and informed that they have 21 days to inform Valley's DSL of any previous safeguarding concerns. The information received will form the start of the pupil's safeguarding chronology at Valley.

17. Safer Recruitment

The school will comply with the guidance set out in Part 3 of Keeping Children Safe in Education (DfE, 2022). At least one member of every appointments panel will have completed Safer Recruitment training.

Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

In addition, as part of the shortlisting process, the Trust's HR Team will consider carrying out an online search as part of our due diligence on the shortlisted candidates and shortlisted candidates will be advised about this. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unfounded, unsubstantiated or malicious. We will not refer to any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious.

We will refer to substantiated allegations in references, provided that the information is factual and does not include opinions.

18. Dealing with concerns regarding school staff or volunteers

To reduce the risk of inappropriate or unprofessional behaviour towards children, all staff including supply staff and volunteers must be aware of safer working practice as outlined in the Trust's Code of Conduct and must be familiar with the Government document 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings'.

A concern, sometimes referred to as an allegation, is any information which indicates that a member of staff including supply staff and volunteers may have failed to meet the requirements set out in the Trust's Code of Conduct, or may have:

- Behaved in a way that has harmed a child, or may have harmed a child;
 - Possibly committed a criminal offence against or related to a child;
 - Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children;
- or

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Staff who have concerns about another member of staff or volunteer should speak to the Head Teacher immediately. If staff have concerns about the Head Teacher, they should contact Valley Primary School's Chair of Governors.

When dealing with allegations that meet the harms threshold, where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken. This should be done in consultation with the school's HR provider and LADO.

Where the school identifies a child has been harmed, that there may be an immediate risk of harm to a child(ren) or if the situation is an emergency, the DSL or Case Manager if different from the DSL, should contact children's social care and, as appropriate, the police immediately.

Two considerations should be made when an allegation is made which are:

- Looking after the welfare of the child(ren) – the DSL or Case Manager if different from the DSL is responsible for ensuring that the child is not at risk and referring suspected cases of abuse to children's social care and / or the police
- Investigation and supporting the person subject to the allegation – the DSL or Case Manager should discuss with the LADO the nature, content and context of the allegation and agree a course of action

Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step. Based on advice from the school's HR representative and/or risk assessment drawn up with the LADO, the following should be considered by the DSL or Case Manager before suspending a member of staff:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying to alternative work in the school so the individual does not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the member of staff but this should only be made if it is deemed to be in the best interests of the child or children and takes account of their views. It should be made making it clear that it is not a punishment and parents should be consulted
- Temporarily redeploying the member of staff to another role in a different location eg another school within the Trust

The definitions that should be used when the school determines an outcome of an allegation are:

- Substantiated – there is sufficient evidence to prove the allegation
- Malicious – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- False – there is sufficient evidence to disprove the allegation
- Unsubstantiated – there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- Unfounded – to reflect cases where there is no evidence or proper basis which supports the allegation being made

Low-Level Concerns

The term low-level concern does not mean that it is insignificant but it means that the behaviour towards a child does not meet the harms threshold (first four bullet points of this section of the policy). Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

A low-level concern is any concern – no matter how small and even if no more than a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in way that:

- Is inconsistent with the staff code of conduct including appropriate conduct outside of school
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- Humiliating pupils or other staff members

It is essential that any such concerns, including those which do not meet the harms threshold, are shared responsibly and confidentially with the DSL or other appropriate staff member / Governor and are recorded and dealt with appropriately. Where low-level concerns are reported to one of the Deputy DSLs, the DDSL should inform the Head Teacher without delay but within 12hrs of receiving the concern. Ultimately, the Head Teacher will make a decision in relation to all low-level concerns.

If there is any doubt as to whether a low-level concern meets the harm threshold, then the LADO should be consulted.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose and the action taken. The name of the individual sharing their concerns should also be recorded. If the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records of low-level concerns will be kept on the staff member's personnel file and reviewed regularly to identify any patterns of behaviour. Where a pattern of behaviour is identified, further advice will be sought from the school's HR representative and/or LADO and the necessary action taken. If, at any time, the harms threshold is met, the case will be referred to the LADO immediately.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately is critical. When implemented correctly, this should:

- Encourage an open and transparent culture;
- Enable the school to identify inappropriate, problematic or concerning behaviour early;
- Minimise the risk of abuse;
- Ensure that adults working with children in or on behalf of the school are clear about the professional boundaries and act within these boundaries and in accordance with the ethos and values of the school.

As part of the review process, consideration will be given as to whether there are wider cultural issues within the school that enabled the behaviour to occur and, where appropriate, policies will be revised or additional training delivered to minimise the risk of such behaviours being repeated.

Low-level concerns which are shared about supply staff and other contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

When dealing with any allegation against a staff member, supply teacher, volunteer or when dealing with low-level concerns, the Trust's Managing Allegations Policy should be consulted and followed.

Working with Volunteers

All volunteers who engage in regulated activity will undergo an enhanced DBS check including barred list information. Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised with pupils or allowed to engage in regulated activity.

Where students over the age of 16 undertake work experience in school, they will be subject to an enhanced DBS check as a volunteer at the school. They cannot undertake work experience without this.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in and wear a visitor's badge. Staff are expected to challenge anyone they see on site without a visitor badge visible.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Risk Assessments

The school will undertake risk assessments and use their professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. When undertaking a risk assessment, the following will be considered:

- The nature of the work with children
- What the establishment knows about the volunteer, including formal or informal information offered by pupils, staff, parents and other volunteers
- Whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability
- Whether the role is eligible for an enhanced DBS check

19. Whistleblowing

All staff and volunteers should feel able to raise concerns about poor and unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team.

The school has a separate Whistleblowing Policy and staff are asked to familiarise themselves with this policy as part of their annual safeguarding training.

Staff should consult the Whistleblowing Policy or consider contacting the NSPCC Whistleblowing Advice line when they think:

- the school / Trust doesn't have clear safeguarding procedures to follow
- their concern won't be dealt with properly or may be covered up
- they have raised a concern but that it hasn't been acted upon
- they are being treated unfairly

A Whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health and safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed

NSPCC Whistleblowing Advice Line: 0800 028 0285 or help@nspcc.org.uk

20. Training

Induction Training is mandatory for all members of staff where staff are familiarised with all the key policies including:

- Child Protection & Safeguarding Policy
- Keeping Children Safe in Education (DfE 2023) Part 1 and Annex B
- Behaviour Policy
- Code of Conduct
- Whistleblowing Policy
- Mobile Phone Policy
- Staff Handbook
- Staff Health & Safety Handbook

Staff are expected to attend a weekly Staff Briefing at 8.30am every Wednesday morning where aspects of safeguarding procedures are discussed. In addition, staff receive regular safeguarding and child protection updates and they are asked to file these in their Safeguarding Files which they are provided with upon induction.

Online safety training along with Prevent Awareness training and FGM training is provided periodically to all staff throughout the year and the Senco provides training opportunities for all staff relating to the medical and health needs of pupils. All staff will receive general training about the filtering and monitoring systems in place in school and will understand that the DSL has responsibility for understanding these systems.

DSLs attend safeguarding training every two years and all staff receive annual update training.

All Governors and Trustees will receive appropriate safeguarding and child protection (including online) training upon induction and this will be regularly updated to equip them with the knowledge to provide strategic challenge and understand their responsibilities. As part of their training, Governors will also learn about their responsibilities in the following areas:

- The Human Rights Act 1998**, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010**, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED)**, which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

21. Use of the school premises for non-school activities

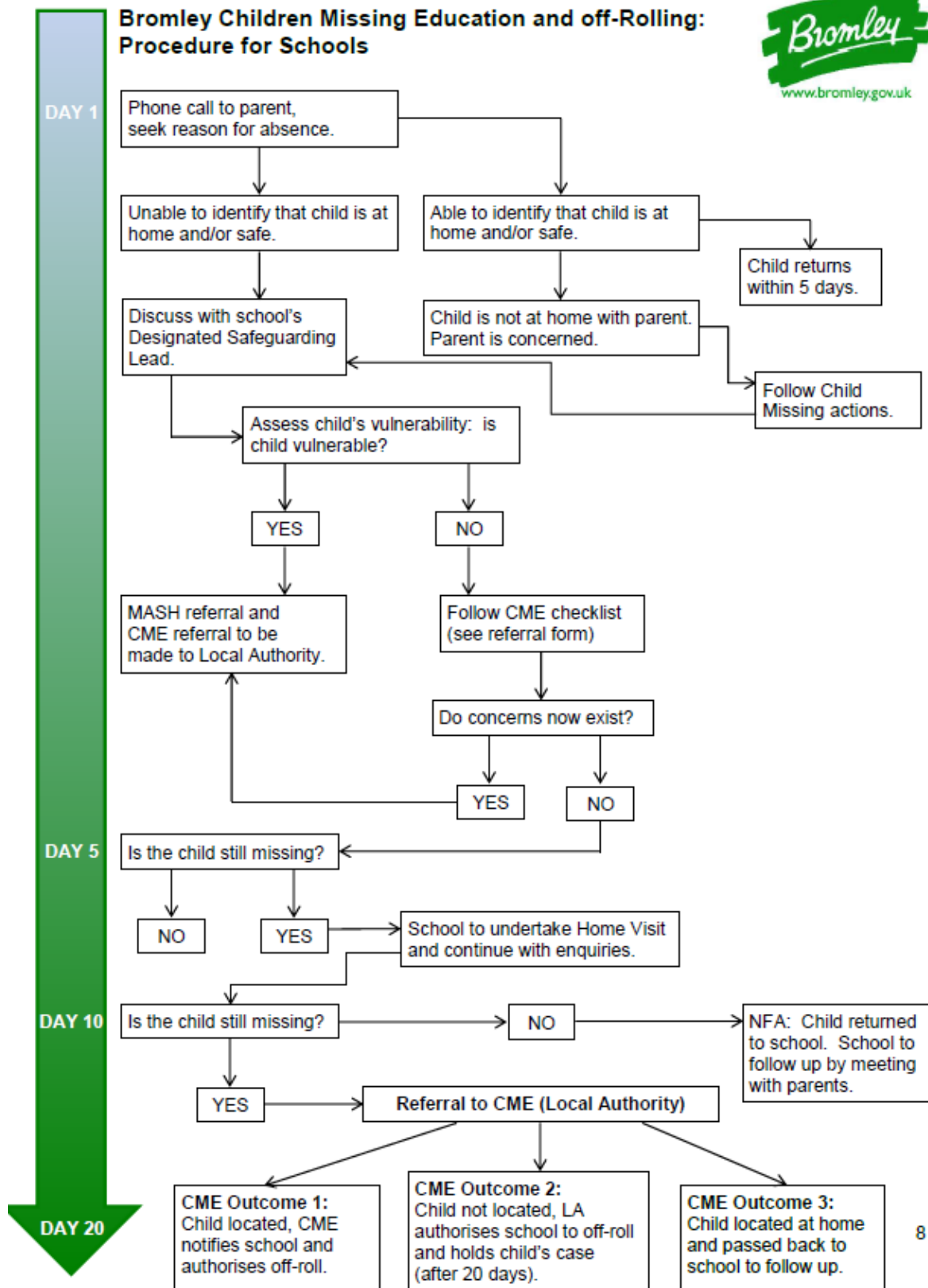
In line with the school's hire agreement, when external providers such as community groups and sports clubs who provide services to children and young people under the age of 18 wish to hire facilities at Valley, the DSL, in collaboration with other relevant school staff will:

- Undertake the necessary checks to ensure that appropriate safeguarding measures are in place by the group, club or organisation
- Inspect all appropriate policies to inspect their validity
- Where policies are deemed to be invalid, the lead member of the group, club or organisation will sign the agreement form confirming their acceptance to follow all relevant safeguarding policies published by the school
- Offer the group, club or organisation a school-based named contact for all safeguarding matters

A failure by a group, club or organisation to comply with the above would lead to a termination of the hire agreement.

Where we receive an allegation relating to an incident that happened when an individual or organization was using the school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities) this will be dealt with in the same way as any other safeguarding allegation. We will follow our usual policies and procedures including informing the LADO as appropriate.

Appendix 1: Bromley Children Missing in Education and Off-Rolling Procedure for Schools












Appendix 2: Child Sexual Exploitation Warning Signs



Child Sexual Exploitation Warning Signs - **SAFEGUARD**

Often, children and young people who are victims of sexual exploitation do not recognise that they are being abused. There are a number of warning signs that can indicate a child may be being groomed for sexual exploitation. To assist you in remembering and assessing these signs and behaviours, we have created the mnemonic - **SAFEGUARD**.

	S exual identity, wellbeing and choice Sexually transmitted infections (particularly repeat infections); Pregnancy; terminations; changing or out of character sexual behaviour; exploring sexual relationships in an unsafe context or environment; unable to disclose sexual orientation and fearful of societal responses.
	A bsence, truancy and going missing Truancy from school, including during the school day; missing from home or care, and repeat incidents; travelling outside borough/town when missing; unexplained absences.
	F amily and home Sexual, physical, emotional abuse and neglect; risks of forced marriage or so called honour based violence; female genital mutilation; domestic violence; substance misuse; parental mental health concerns; bereavement; parental and sibling criminality; experiences of homelessness or sofa surfing; living in care or temporary accommodation; immigration status.
	E motional and physical health Suicidal thoughts, plans and attempts; self-harm; low self-esteem/confidence/worth; learning difficulties; changing emotional wellbeing and signs of poor mental health; unexplained injuries and changes in physical appearance.
	G angs, Groups, Age Gaps and Crime Involvement in gangs or gang affected family, peers or siblings; concerns of abusive peer groups; involvement with older individuals or groups, lacking friends in the same age groups; older 'boyfriends'; sudden changes in peer groups; bullying, both on and off line; friends of young people experiencing CSE.
	U se of technology and sexual bullying Sexting, both sending and receiving; being listed on social network pages in relation to sexual activity and, or named in videos; secretive use of the internet/phones/social networking sites; sudden behaviour changes when using the phone or internet; control via phone or internet; multiple or secretive social networking profiles.
	A lcohol and substances Reliance on and changing use of substances, both legal and illegal.
	R eceipt of unexplained gifts or money Unexplained money, mobile phones; phone credit, items, clothes, money; new nails; travel in taxis; gifts where payment is required at a later date; worries about having debts
	D istrust of authority figures Resistance to communicating with parents, carers, teachers, social services, health, police and others.

SAFEGUARD Mnemonic taken from the London Child Sexual Exploitation Operating Protocol, 3rd Edition (June 2017)

Appendix 3: Child Sexual Exploitation – Spot the Signs

SPOT THE SIGNS

When a child or young person is being exploited it can be difficult for them to see what is happening or know how to tell someone. It is important therefore that as parents and carers we are able to spot the warning signs and know how to best offer support.

MISSING
This might be returning home late, staying out over night or missing school. They might be defensive about where they have been, who they have been with and what they have been doing.

MISSING FROM HOME
This might be returning home late, staying out over night or missing school. They might be defensive about where they have been, who they have been with and what they have been doing.

PHONE
Receiving excessive or strange messages or phone calls from people you and/or they don't know. Having adults as friends on social networking sites.

ALCOHOL OR DRUGS
Being under the influence of alcohol or drugs on a regular basis. Particularly alcohol that is normally associated with adult drinking.

GIFTS
Coming home with new expensive items that they couldn't normally afford like phone, jewellery, new trainers or computer games. Or talking about people who give them free food or cigarettes.

CARS
Getting picked up or dropped by unknown people, or talking about going to new places.

ADULT FRIENDS
Associating with or developing close relationships with people over 18. They may give them lifts or invite them into adult activity like drinking, parties or even offer them the chance of a job.

MOODS
Changes in mood, maybe acting secretive, withdrawn or aggressive.

INJURIES
Having marks on their bodies which they try to conceal.

SUDDEN CHANGE
In friendship groups, music taste, clothes, behaviour, school attendance.

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Appendix 4: Brook Sexual Behaviours Traffic Light Tool 0-5 years



SEXUAL BEHAVIOURS

●●● TRAFFIC LIGHT TOOL

Behaviours: age 0 to 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Appendix 5: Brook Sexual Behaviours Traffic Light Tool 5-9 years



SEXUAL BEHAVIOURS

●●● TRAFFIC LIGHT TOOL

Behaviours: age 5 to 9 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Appendix 6: Brook Sexual Behaviours Traffic Light Tool 9-13 years



SEXUAL BEHAVIOURS

●●● TRAFFIC LIGHT TOOL

Behaviours: age 9 to 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peer

Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Appendix 7: Filtering Standard for CSAT

Schools within CSAT have a managed broadband service with one of two providers.

- LGfL provide a filtering system called WebSense (powered by NetSweeper).
- EIS provide a filtering system called Smoothwall.

For both systems TIO IT Consultants have access for the purposes of configuring settings, monitoring for issues, tweaking the filtering, and contacting providers for any support required.

How Filtering Systems Work

Filtering systems have categories that are either allowed or blocked for groups of users. As an example, all websites categorised as abortion may be allowed for staff but blocked for students. In addition to this, each school has its own list of exceptions. Websites that are allowed or denied.

All these settings are put into a policy and assigned users or devices. At the CSAT schools there are Staff policies which are applied to Windows staff logins computers and staff mobile devices and there are student policies which are applied to Windows student logins and student devices.

Guest Wi-Fi networks intentionally deny users access to the school network but still provide a filtered connection to the Internet via a specific policy.

Monitoring of Systems

TIO Consultants access the filtering systems to check filtering policies and ensure that:

- They are applying to the correct users and devices on the school network.
- The correct categories are allowed or denied.
- The school's custom lists are updated according to need.

Scheduled reports can be run that will send data to relevant staff. SWGfL's testing tool can be run to check that the filtering system is operational.

Both providers have confirmed that

- They are members of the Internet Watch Foundation
- They implement the CTIRU block list which cannot be bypassed.
- Techniques and technologies to bypass filtering is also blocked.

Desktop monitoring systems can be expensive to purchase and run and they are only supported on Windows computers. Schools should risk assess if they require monitoring software, or if they can adequately monitor devices using staff observation. It should be noted however that monitoring software will run on desktop computers and laptops but not mobile devices such as iPads.

The schools filtering and monitoring provision is reviewed annually by TIO IT Consultants as part of a suite of Cyber Security checks undertaken to ensure the security in integrity of the school network.

Reporting Concerns

Staff should notify a TIO Consultant if: unsuitable material has been accessed, if they are teaching topics which could create unusual activity on the filtering logs, there is failure in the software or abuse of the system or if they notice abbreviations or misspellings that allow access to restricted material.

Filtering systems will identify the device name, date, time, and search criteria of an incident.

If a website needs to be blocked or if there are concerns that the filtering system is not operating correctly, staff should immediately log a ticket with the IT consultant who will investigate.