

Policy Essential Information

Title: Safeguarding Child including Child Protection and Training Policy

Date Approved: July 2013

Date Last Reviewed: September 2018

Status: Statutory

Delegation: Governing Body Resource Committee

Review Frequency: Annually

Policy Locations: Website/Staff Shared Drive/Hard Copy

Next Review Date: September 2019

Safeguarding Child including Child Protection and Training Policy

Statement of intent

This policy replaces any previous policy and follows the DfE regulations and those issued by the Harrow Local Safeguarding Board (HSCB). All members of staff are affected by and expected to adhere to this policy.

In line with the school's Equal Opportunities and Special Educational Needs and Disability policies, we aim to give all students equal opportunities to take part in all aspects of school life, as far as is appropriate, practicable and compatible with giving regard to health and safety and the efficient education of other students.

This policy takes account of the Government's aim for young people to have the support they need under Every Young person Matters which we believe encompasses our vision statement of 'Aspire and Achieve' and this allows us to tailor every aspect of school life to ensure each student fulfils their potential: To do this we will support all of our students to:

- to be healthy
- to stay safe
- to enjoy and achieve
- to make a positive contribution
- to achieve economic well-being

The policy will follow the five principles of the Student Plan:

- to support parents/carers and families
- to allow students to reach their full potential
- to enable students to enjoy their young personhood whilst preparing for adult life
- to provide services in response to students and family needs.
- to use preventative measures to help students avoid the possibility of failure

This policy is built upon The Jubilee Academy's commitment to the development and maintenance of good behaviour and a positive and inclusive ethos for all members of the school community. It reflects the school's commitment to safeguarding in creating a culture of vigilance and to encourage and reflect diversity in all aspects of learning at The Jubilee Academy.

This policy is based on the Department of Education's statutory guidance Keeping Children Safe in Education (DfE September 2018) and Working Together to Safeguard Children, (DfE July 2018)

Keeping Children Safe in Education (DfE July 2016) has been revised with effect from September 2018 and applies to ALL SCHOOLS and is STATUTORY.

This is statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, and the Non-Maintained Special Schools (England) Regulations 2015. Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18

This policy will be brought to the attention of, and/or issued to, all members of staff and will be available for parents/carers as required and will be reviewed on an annual basis by the Governing Body.

Mike Jarrett
Head of School

Howard Freed
Chair of Governors

Aims and objectives

This Policy is intended to help all understand that **everyone** has a statutory responsibility with respect to safeguarding in identifying concerns, sharing information and taking prompt action when ensuring students and families are to receive the right help at the right time.

In keeping with the key aims of 'Keeping Children Safe in Education, our role is: to keep students safe, and it links with other policies to form an integral part of the school's suite of safeguarding policies which promote the welfare, health and safety of students and staff.

The purpose of this policy is to inform staff, parents/carers, volunteers and governors about the school's responsibilities for safeguarding students and to enable everyone to have a clear understanding of how these responsibilities should be carried out.

We intend to:

- Establish and maintain an environment where students feel safe, secure, are encouraged to talk, and are listened to when they have a worry or concern;
- Establish and maintain an environment where school staff and volunteers feel safe, are encouraged to talk and are listened to when they have concerns about the safety and wellbeing of a young person;
- Ensure students know that there are adults in the school whom they can approach if they are worried;
- Ensure staff are properly trained in recognising and reporting safeguarding issues
- Ensure that students who have been abused will be supported;
- Include opportunities in the Personal, Social, Health, Religious and Economic Education (PSHRE) Curriculum for students to develop the skills that they need to recognise and stay safe from abuse;
- Contribute to the five outcomes which are key to students' wellbeing:

Statutory framework

In order to safeguard and promote the welfare of students the school will act in accordance with the STATUTORY legislation and guidance published in 'Keeping Children Safe in Education, (DfE: Sep 2018).

This policy is also based on the following legislation:

- **The Teachers' Standards 2012** state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- 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
- **Statutory Guidance: Working Together to Safeguard Children**, July 2018: a guide to interagency working to safeguard and promote welfare of children
- **Statutory Government Guidance: Information Sharing for Practitioners** providing safeguarding services to children, young people, parents and carers, July 2018
- **Statutory Government Guidance: Sexual violence and sexual harassment between children in schools and colleges**, May 2018

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

Other updated key guidance and advice

- Departmental advice: What to do if you are worried a child is being abused – Advice for practitioners’, March 2015
- Statutory Guidance for Local Authorities: Children Missing Education, Sept 2016
- Government Guidance: Missing Children and Adults strategy, 2011
- Harrow Academies HR Policies
- Government Advice on Whistleblowing
- Harrow Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures (Electronic)

Key Contacts

(i) Safeguarding and promoting the Welfare of Children at The Jubilee Academy

Role	Name	Telephone	Email
Designated Safeguarding Lead (DSL)	Mr Boothe	02030961221	Safeguarding@TheJubileeAcademy.onmicrosoft.com
Deputy Designated Safeguarding Leads (DDSL)	Mr Sutherland	02030961221	
Designated Lead Governor for Safeguarding & Health and Safety	Ms Cozens	02030961221	
Lead for Looked After Children	Mr Boothe	02030961221	
Lead for Online Safety - (DSL)	Mr Boothe	02030961221	
Head of School	Dr Jarrett	02030961221	info@thejubileeacademy.org.uk
Chair of Governors	Mr Howard	02030961221	info@thejubileeacademy.org.uk

(ii) Key Local contacts for safeguarding children

Harrow Children’s Social Care & Multi agency Safeguarding Hub (MASH)	‘Golden Number’: 020 8901 2690 Emergency Duty Team: weekends, bank holidays and between 5pm – 9am during the week: 0208 424 0999
Police	101 or for immediate emergency: 999
FGM- Mandatory reporting	Police on 101
Local Authority Designated Officer for Allegation against staff	Initial referrals via MASH/Golden Number as above. Ongoing cases: 020 8736 6435

Children and Young People with Disabilities 0-25 years	020 8966 6481
Local multi-agency procedures, guidance and training: Harrow Safeguarding Children Board (HSCB)	www.harrowscb.co.uk
NSPCC	0800 800 5000
Childline	0800 1111
Government's Whistleblowing Service via NSPCC Report Line	0800 028 0285

Definition of Safeguarding and Child Protection

Safeguarding and promoting the welfare of children is defined as:

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

Children includes everyone under the age of 18

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

Child protection is one part of safeguarding and promoting welfare and refers to the procedures that are undertaken to protect specific children who are, are believed to, or are likely, to suffer significant harm.

Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a young person has been abused or are at risk of abuse - these procedures should also cover circumstances in which a member of staff is accused of, or suspected of, abuse.

School staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with students.

We as a school will endeavour to ensure that we act quickly to ensure early help is given to students.

This policy forms part of a set of documents and policies which relate to the safeguarding responsibilities of the school. Please read in conjunction with the school's wider safeguarding policies on:

- **Behaviour Policy**
- **Staff Code of Conduct**
- Attendance Policy
- Disability and Access plan;
- Equal opportunities;
- E-safety and ICT Acceptable use;
- Single central record;
- Visitor policy;
- Safe working practice agreement; and the
- Health and Safety suite of Policies

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Harrow Safeguarding Children Board (HSCB). Our policy and procedures also apply to extended school and off-site activities.

Safer Recruitment, Selection and Pre-employment vetting

We ensure that all appropriate measures are applied in relation to **everyone** who works in the school who is likely to be perceived by the children as a safe and trustworthy adult including Trustees, Governing body members, teachers, trainee teachers, support staff, volunteers, external agency workers, and contractors or employee of the contractors.

The School Business Managers and Head of School have completed Safer Recruitment training and involved in all staff and volunteer appointments and arrangements (including, where appropriate, contracted/commissioned services).

Safer recruitment practice includes scrutinising applicants, verifying references, checking previous employment history, checking if they have lived and worked abroad, criminal record checks (Barred List Check and Disclosure and Barring Service checks), prohibition checks, educational and professional qualifications.

It also includes undertaking interviews and on successful appointment:

- Verify a candidate's identity;
- Obtain an enhanced DBS including barred list information for those engaged in regulated activity*
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- Check there are no prohibition orders to prevent a person from carrying out teaching work
- Verify the candidate's mental and physical fitness to carry out their work responsibilities.
- Verify Professional qualifications
- Check that those that are engaged in management roles will have an additional check to ensure they are not prohibited under section 128 provisions
- verify the person's right to work in the UK
- Verify if the person has lived outside the UK are subject to additional checks as appropriate

*The School will take account of the Keeping children safe in education guidance and the statutory guidance for regulated activity, which is replicated in **Annex A & B** of this guidance. This confirms the following:

1. DBS Enhanced Disclosure with barred list information is required for all staff engaged in a regulated activity (as defined in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006).

In summary, a person will be considered to be engaging in regulated activity if as a result of their work they:

- will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children; or
- will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; ^{or}
- engage in intimate or personal care or overnight activity, even if this happens only once.

A more detailed description of regulated activity is provided in **Appendix B**;

2. All other staff who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate. This would include contractors that would have the opportunity for contact with children and who work under a temporary or occasional contract.
3. A **supervised** volunteer who regularly teaches or looks after children is not in regulated activity, however an enhanced DBS check without a barred list check will be undertaken for these staff in appropriate circumstances.

4. Obtain an enhanced DBS certificate with a barred list check for all volunteers who are new to working in regulated activity.
5. Satisfy themselves that supply staff have undergone the necessary checks by obtaining written confirmation from the agency or third-party organisation and check the identity of supply staff in arrival;
6. Ensure that any contractor, or any employee of the contractor, who is to work at the school or college has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required. Check the identity of contractors on arrival;
7. Use the DBS Update Service at the point an application for New DBS is made. Before using this service, the school will:
 - a. Obtain consent from the applicant to do so;
 - b. Confirm the certificate matches the individual's identity; and
 - c. Examine the original certificate to ensure that it is for the appropriate workforce.

The school can then subsequently carry out a free online check. This would identify whether there has been any change to the information recorded, since the initial certificate was issued and advise whether the individual should apply for a new certificate. Individuals will be able to see a full list of those organisations that have carried out a status check on their account;

8. Keep a single central record detailing the range of pre-appointment checks carried out on their all staff, supply staff, trainee teachers or others who work in regular contact with children, including volunteers and all members of the academy trust, this means the members and the trustees. The register will confirm whether a check was carried out and the date of such a check

Appendix A gives guidance has a flow chart describing the different checks required for different roles, for example, new staff, new volunteers or trainee teacher

As an alternative provision free school academy, the school will provide a written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff

The school will also request a written confirmation that appropriate safeguarding checks have been carried out on individuals who may visit the school from the commissioning schools i.e. those checks that the school would otherwise perform in respect of its own staff

The school that the work experience provider has policies and procedures in place to protect children from harm. This includes barred checks by the DBS people who supervise a child under the age of 16 on a work experience placement

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 into the eReception iPad, read our safety information and wear a visitor's badge.

All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times.

Roles and responsibilities

Here at The Jubilee Academy, we have established as Safeguarding Committee which consists of:

POSITION: The Designated Safeguarding Lead (DSL) for child protection and safeguarding in this school is:

**Deputy Head of School: Personal Development and Welfare
(Name: Marlon Boothe)**

POSITION: Deputy Designated Safeguarding Lead (DDSL) to act in the absence/unavailability of the Designated Safeguarding Lead:

**Deputy Head of School: Conduct and Discipline
(Name: Darren Sutherland)**

**POSITION: Nominated School Governor for Safeguarding and Health and Safety
(Name: Becky Cozens)**

**POSITION: Attendance and Pastoral Officer
(Name: Claire Dowling)**

**POSITION: Pastoral Administrator
(Name: Aisha Ahmed)**

**POSITION: Health and Safety Lead
(Name: Sukhi Cooper)**

All school staff will undergo appropriate training in child protection and safeguarding and be

The frequency and depth of training will depend upon their role. The aim of training is to develop their understanding of the signs and indicators of abuse and to ensure they understand what to do if they have concerns about a child. Staff working in a teaching role will receive training annually in line with designated good practice.

The Governing Body

The Governing Body has overall responsibility for ensuring that there are sufficient measures in place to safeguard the students in The Jubilee Academy.

The Governing Body must ensure:

- The effective implementation of this Child Protection Policy and safeguarding procedures in accordance with current government guidance on Keeping Children Safe in Education and local agreed inter agency safeguarding procedures set up by the Local Safeguarding Board (LSCB);
- The school operates safe recruitment procedures and makes sure that all appropriated checks are carried out on staff and volunteers who work with children;
- Has a named governor for safeguarding and child protection that is trained as required;
- Appointment of Lead Designated Persons for Safeguarding and Child Protection who are senior members of the school leadership team;
- To appoint a designated teacher to promote the educational achievement of children who are looked after and to ensure that staff have the skills and knowledge and necessary to keeping looked after children safe’;
- Ensure the school contributes to multi-agency working in line with the current statutory guidance Working together to safeguard children
- Appropriate arrangements in place that set out the process and principles of information sharing to reflect Working together to safeguard children, GDPR and Data Protection Bill;
- Relevant ‘safeguarding students’ training (including online safety), for all school staff/volunteers, is attended, as per this policy;
- Appropriate and careful management of allegations;
- Appropriate safeguarding responses to reports of to Sexual violence and sexual harassment between children

- Appropriate safeguarding responses to children who go missing from education to help identify the risk of abuse and neglect;
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- Deficiencies or weaknesses in safeguarding arrangements are remedied without delay;
- The Chair of Governors will be responsible in the event of an allegation of abuse being made against the Head of School. He can be contacted via the school;
- Safeguarding policies and procedures are reviewed annually, and information provided to the local authority about them and about how the above duties have been discharged.

The Head of School

The Head of School will ensure that:

- The policies and procedures adopted by the Governing Body are fully implemented, and followed by all staff;
- There are sufficient resources and time allocated to enable the designated person and other staff to discharge their responsibilities effectively;
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to students and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed procedures; and
- He/she manages allegations made against staff and volunteers. Should an allegation be made against the Head of School, it is the responsibility of the Chair of Governors to manage this as part of their role of the School's Governing Bod

Training and Development

- We comply with DfE guidance on 'Keeping children safe in education' at all times;
- The **Designated Safeguarding Lead (DSL)** for child protection and safeguarding is trained to Advanced level 3 Multi Agency Risk Assessment and Decision Making in Child Protection and Prevent Awareness Training
- The DSL undertakes regular refresher training every YEAR and receives regular safeguarding updates via Harrow LSCB DSL forums and newsletters.
- The **DSL** for child protection and safeguarding will be supported by SLT, nominated Governor CP and nominated HSCB staff. Advice and support is always available from the HSCB designated officer.
- The **Deputy Designated Safeguarding Lead (DDSL)** for child protection and safeguarding, will when the DSL is absent take over the activities of the DSL and is therefore also trained to Advanced level 3 Multi Agency Risk Assessment and Decision Making in Child Protection and Prevent Awareness Training
- The **DDSL** undertakes regular refresher training every YEAR
- We have a designated **Safeguarding and Health and Safety Governor** designated to monitor Child Protection and to monitor overall Safeguarding.
- All **school staff, governors and volunteers** will receive child protection and safeguarding training so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow as per the content of 'Keeping Children Safe in Education (2018).
- **All staff and volunteers will receive safeguarding training** at the beginning of every academic year delivered by the **DSL** for child protection and safeguarding;
- Mandatory and further ongoing safeguarding training will be part of our INSET and Continuing Professional Development (CPD) – e.g.
 - Prevent and Channel Programme
 - Female Genital Mutilation - FGM
 - Child Sexual Exploitation - CSE
 - Child on Child Sexual Violence and Sexual Harassment
- In addition, all staff and volunteers will be required to read **Part 1 of KCSIE (2018):** Safeguarding Information for all staff.
- All new and temporary staff will be made aware of the safeguarding policies and procedures by the **DSL** for safeguarding and will be required to undertake training and induction on the school's suite of policies which safeguard and promote the welfare, health and safety of students. This will include training and development regarding this policy and procedure.

- All staff will continue to receive ongoing safeguarding updates and guidance
- A Record will be kept of the names of staff and the training they have received, to what level and the date of that training;
- All staff members will be trained to know how to respond to a pupil who makes an allegation or appears to be vulnerable or at risk. Staff will be supported by the **DSL** for child protection and safeguarding;
- All parents/carers are made aware of the responsibilities of staff members about Safeguarding and Child Protection procedures and can view this policy on the website;
- All pupils are made aware of this policy and who they can speak to in school if they are worried or concerned. The school is committed to ensuring that pupils are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. School's arrangements for consulting with and listening to pupils are the tutor system, school council, mentoring and counselling service.
- Our procedures will be regularly reviewed and up-dated and reported on appropriately to the Governing Body.
- The school recognises that it is essential to establish positive and effective working relationships with other external agencies e.g. HSCB, Children's Services, Police, Health, in Partnership with schools, and Early Intervention Service. These relationships are continually nurtured and developed via a range of activities and dialogue. Further information can be made available upon request from the **DSL and Pastoral Officer**
- This policy is formulated by the Head of School and **DSL** for child protection and safeguarding, in consultation with staff and is monitored by other members of the Senior Leadership Team. The policy is subject to review by The Full Governing Body of The Jubilee Academy.

DfE guidance on '**Keeping children safe in Education 2018** places the following responsibilities on all schools:

- Schools should be aware of and follow the procedures established by Harrow Local Safeguarding Children's Board (LSCB) – www.harrowlscb.co.uk
- Staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions;
- Schools should have procedures (of which all staff are aware) for handling suspected cases of abuse of students, including procedures to be followed if a member of staff is accused of abuse, or suspected of abuse;
- The **DSL** for child protection and safeguarding should have responsibility for co-coordinating action within the school and liaising with other agencies;
- Staff with designated responsibility for child protection and safeguarding should receive appropriate training.

The role of the Designated Senior Person for Child Protection and Safeguarding Lead is to:

- Has lead responsibility for safeguarding and child protection (including online safety)
- Is given the time, funding, training, resources and support to provide advice and expertise within the educational establishment;
- Successfully complete the enhanced level 3 safeguarding inter-agency training;
- Is a member of the Senior Leadership Team
- Ensures that he/she receives refresher training annually to keep his or her knowledge and skills up to date;
- Whilst the activities of the **DSL** can be delegated to the **Deputy Designated Safeguarding Lead (DDSL)** for child protection and safeguarding, the ultimate **lead responsibility** for child protection, as set out above, remains with the DSL, this **lead responsibility** is not be delegated.
- Ensure that all staff who work with students undertake appropriate training to equip them to carry out their responsibilities for safeguarding students effectively and that this is kept up to date by refresher training at yearly intervals;
- Record the names of staff and the training they have received, to what level and the date of that training;
- Ensure that new staff receive induction training before commencement of their work with students at the school;

- Ensure that temporary staff and volunteers are made aware of the school's arrangements for safeguarding students;
- Ensure that the school operates within the legislative framework and recommended guidance before they commence work with students at the school;
- Ensure that all staff and volunteers are aware of the Harrow LCSB Young person Protection and Safeguarding Students Procedures and any other relevant local guidance e.g. safe drop off/collection of student's guidance;
- Liaise with the Head of School to inform him/her of any issues and ongoing investigations under section 47 of the Children Act 1989 and police investigations;
- Liaise with the Head of School to ensure there is cover for this role;
- Ensures that that this policy is updated and reviewed annually and work with the governing body regarding this;
- Develop effective working relationships with other agencies and services;
- When sharing information, use appropriate information sharing guidance in accordance with the school's Data Protection Policy that reflects Working together to safeguard children, GDPR and Data Protection Bill
- Decide upon the appropriate level of response to specific concerns about a young person e.g. discuss with parents/carers, offer an assessment via the Harrow Multi Agency Safeguarding Hub (**MASH**) referral system for additional support and services.
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Liaise and work with Safeguarding and Specialist Services over suspected cases of young person abuse;
- Refer cases where a crime may have been committed to the Police as required;
- Ensure that accurate safeguarding records relating to individual students are kept separate from the academic file in a secure place, marked 'Strictly Confidential' and are passed securely on transfer (both to The Jubilee Academy and on exit back to their 'home school');
- Submit reports and ensure the school's attendance at young person protection conferences and contribute to decision making and delivery of actions planned to safeguard the young person
- Ensure that the school effectively monitors students about whom there are concerns, including notifying Safeguarding and Specialist Services when there is an unexplained absence of more than two days for a young person who is the subject of a young person protection plan;
- Provide guidance to parents/carers, students and staff about obtaining suitable support;
- Discuss with new parents/carers the role of the DSL and the role of safeguarding in the school. Make parents/carers aware of the safeguarding procedures used and how to access the young person protection.

All Staff Responsibilities

All staff must comply with the school's policies and procedures and attend appropriate training.

When to be concerned

All staff and volunteers should be aware that the main categories of abuse are:

- Physical abuse;
- Emotional abuse;
- Sexual abuse;
- Neglect.

All staff and volunteers should be concerned about a young person if he/she presents with indicators of possible significant harm – see **Appendix C** for details.

Additional areas of concern

As stated in legislation Keeping Children Safe in Education additional areas of concern can extend to:

- Female Genital Mutilation – mandatory duty for staff to report
- Child Sexual Exploitation
- Prevent Duty
- Children Missing from Education

- Child on Child sexual violence and sexual harassment

Generally, in an abusive relationship the young person may:

- Appear frightened of the parent/s or other household members e.g. siblings or others outside of the home;
- Act in a way that is inappropriate to her/his age and development (full account needs to be taken of different patterns of development and different ethnic groups);
- Display insufficient sense of 'boundaries', lack stranger awareness;
- Appear wary of adults and display 'frozen watchfulness'.

Concern about a Young person

- If any member of staff is concerned about a young person, he or she must inform the **DSL** for Safeguarding and Child Protection;
- The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations. A 'Record of Concern' pro-forma is available on the school's ICT network in the staff shared area – see **appendix E**;
- The Lead Designated Persons for Safeguarding and Child Protection will decide upon the appropriate level of response to specific concerns about a young person e.g. discuss with parents/carers, offer an assessment via the Harrow MASH referral system for additional support and services.
- If it is decided to make a referral to Harrow MASH referral system this will be discussed with the parents/carers, unless to do so would place the young person at further risk of harm;
- Particular attention will be paid to the attendance and development of any young person about whom the school has concerns, or who has been identified as being the subject of a young person protection plan and a written record will be kept;
- Where a student transfers to The Jubilee Academy and has been/or is the subject of a young person protection plan, the Lead Designated Persons for Safeguarding and Child Protection will liaise closely with the Lead Designated Persons for Safeguarding and Child Protection in the 'home school' to ensure that social care and the young person's social can make the appropriate transfer arrangements of records (which will be kept in a secure manner, and separate from the young person's academic file);
- The Lead Designated Persons for Safeguarding and Child Protection are responsible for making the senior leadership team aware of trends in behaviour that may affect student welfare. They are responsible for putting in place the necessary training for the SLT.

Dealing with a Disclosure

If a young person discloses that he or she has been abused in some way, the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief;
- Take what the child says seriously;
- Keep an open mind;
- Allow the young person to talk freely;
- Reassure the young person, but not make promises which it might not be possible to keep;
- Not promise confidentiality – it might be necessary to refer to Student Services: Safeguarding and Specialist Services;
- Reassure him or her that what has happened is not his or her fault;
- Stress that it was the right thing to tell;
- Listen, only asking questions when necessary to clarify;
- Not criticise the alleged perpetrator;
- Explain what has to be done next and who has to be told;
- Make a written record (see Record Keeping);
- Pass the information to the Designated Senior Person without delay.

Support

Dealing with a disclosure from a young person, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the Designated Senior Person.

Confidentiality

Safeguarding students raises issues of confidentiality that must be clearly understood by all staff/volunteers in the school and information will be shared on a need to know basis

- All staff in the school, both teaching and education support, have a responsibility to share relevant information about the protection of students with other professionals, particularly the investigative agencies (MASH and the Police);
- If a young person confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the young person in a manner appropriate to the young person's age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other relevant professionals to help keep the young person or other students safe;
- Staff/volunteers who receive information about students and their families in the course of their work should share that information only within appropriate professional contexts.

Communication with parents/carers

The Jubilee Academy will:

- Undertake appropriate discussion with parents/carers prior to involvement of another agency unless to do so would place the young person at further risk of harm or undermine the collation of evidence;
- Ensure that parents/carers have an understanding of the responsibilities placed on the school and staff for safeguarding students.

Record Keeping

When a young person has made a disclosure, the member of staff/volunteer should:

- Make brief notes as soon as possible after the conversation. Use the school 'Record of Concern' pro forma (**Appendix E**) wherever possible. Copies of the 'Record of Concern' proforma can be found on the ICT Network in the staff shared area;
- Not destroy the original notes in case they are needed by a court;
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the young person;
- Draw a diagram to indicate the position of any visible injuries and **do not** remove clothing from intimate areas;
- Record statements and observations rather than interpretations or assumptions.

All records need to be given to the **DSL** for safeguarding promptly. No copies should be retained by the member of staff or volunteer.

The Designated safeguarding Lead (**DSL**) for safeguarding will ensure that all safeguarding records are managed in accordance with the Education (Student Information) (England) Regulations 2005.

Health & Safety

School Health and Safety procedures reflect the consideration we give to the protection of our children both within the school environment and when away from the school when undertaking school trips and visits.

Allegations Involving School Staff/Volunteers

The Jubilee Academy follows the guidance as outlined in part four of DfE document: 'Keeping Children Safe in Education' published and updated in September 2018 and follows the local HSCB Allegations Management involving staff and volunteer's guidance.

An allegation is any information which indicates that a member of staff/volunteer that provides education for children under 18 years of age may have:

- Behaved in a way that has, or may have harmed a young person;
- Possibly committed a criminal offence against/related to a young person;
- Behaved towards a young person or students in a way which indicates s/he would pose a risk of harm if they work regularly or closely with students.

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, school code of conduct, local HSCB 'Managing Allegations against Staff and Volunteers Working with Children and Young People (2015)' or Government document 'Guidance for Safer Working Practice for Adults who work with Students and Young People in Education Settings'

If a member of staff has a concern then this should be reported directly to the Head of School however if the allegation is made against the Head of School, this will be investigated by the Chair of Governors.

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Head of School.

The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Head of School will not investigate the actual allegation, or take written or detailed statements, but will assess whether it is necessary to refer the concern via the HSCB new pathway of MASH for new referrals. If the allegation meets any of the three criteria set out at the start of this section, MASH will then forward relevant referrals to the Local Authority Designated Officer (LADO).

If it is decided that the allegation meets the threshold for safeguarding, this will take place in accordance with the Harrow Safeguarding Students Board Inter-Agency Young Person Protection and Safeguarding Students Procedures.

If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the school's internal procedures.

The Head of School should, as soon as possible, **following briefing** from the Designated Officer inform the subject of the allegation.

If the concerns are about the Head of School, then the Chair of Governors should be contacted. The Chair of Governors at The Jubilee Academy is: **Mr Howard Freed**

In the absence of the Chair of Governors, the Vice Chair of Governors should be contacted. The Vice Chair of Governors at The Jubilee Academy is: Ms Becky Cozens

Allegations of abuse made against school staff

- By virtue of their day to day contact, staff working with students, play an important role in the prevention of abuse and neglect. This close contact could also afford opportunities for abuse, and could leave staff vulnerable to allegations, whether or not maliciously motivated.
- It is therefore important that members of staff avoid situations such as being alone with a student, which could leave them open to allegations being made against them. Sensitive interviews should be conducted with a second adult present.
- The management of allegations of abuse must be conducted with an “open and enquiring mind”, in a manner and at a pace that reflects the seriousness of the underlying charges. At the same time, care must be taken to avoid ill-considered judgments and actions, including decisions to suspend.

Advice to Staff

- We will ensure that where allegations against staff are made, they are properly and appropriately investigated following the procedures laid down by the Harrow Safeguarding Children Board.
- Recognise that on occasion troubled young people can make false or misplaced allegations against staff.
- Would always advise staff to avoid putting themselves in potentially vulnerable situations with students i.e. by not being alone with individuals in confined or secluded areas. However, where this is the case, they should maintain a physical barrier (desk) between themselves and the individual, and ensure any door remains open.
- Would advise staff not to develop inappropriate personal relationships with students or young people
- Reiterate in this policy our approach to dealing with challenging behaviour e.g. ‘We will maintain an appropriate distance (an arm’s length) between ourselves and students, recognising and respecting their rights to personal space, as we expect them to respect ours’.
- Would always advise staff never to stand in the way of a student who is determined to leave a room, as this may result in unavoidable physical contact which may later be misinterpreted.

Dealing with allegations against Staff

Harrow Safeguarding Children Board procedures, as designated below, will be followed:

If a member of school staff becomes aware of an allegation of abuse where a member of staff is thought to have been involved in the abuse they should:

1. Ask the child if s/he requires medical attention, and to ensure that medical attention is provided.
2. Report the matter as a matter of urgency to the Head of School unless the member of staff involved is the Head of School then the teacher must contact the Chair of Governors.
3. Make written notes of the circumstances as reported to him/her. Pass these notes to the Head Teacher (do not investigate the matter yourself and do not discuss the matter with any other person).
4. The Head of School on all such occasions initially will discuss with concerns regarding the incident with the local HSCB Managing Allegations pathway via MASH who can be contacted on: HARROW MASH: 020 8901 2690
5. The Head of School will then discuss the content of the allegation the LA Designated Officer) for Child Protection once the referral has been made via MASH.
6. EPM – HR - will advise the Head of School/Chair of Governors (as appropriate) of any immediate action that may need to be taken with regard to the member of staff against whom an allegation has been made.
7. The above group, together with the designated teacher/Head of School/Chair of Governors (as appropriate) will hold a child protection strategy meeting, led by Safeguarding Children’s Board, to discuss the way in which the matter will be dealt with.
8. The school will follow Harrow Safeguarding Children Board Allegations Management procedures as revised for managing allegations against staff, a copy of which will be available in the school.

9. The school will follow procedures to inform the Disclosure and Barring Service if a member of staff in a regulated activity has been dismissed or removed due to safeguarding concern or would have been had they not resigned.

Concerns with safeguarding practices in the school

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

The school has appropriate whistleblowing procedures as outlined in the suite of Harrow Academies HR Policies, to support staff for such concerns to be raised.

This policy aims to:

- provide avenues for employees to raise concerns internally as a matter of course, and receive feedback on any action taken;
- provide for matters to be dealt with quickly and appropriately; and ensure that concerns are taken seriously;
- reassure employees that they will be protected from reprisals or victimisation for whistle-blowing where they have a genuine concern;
- allow employees to take the matter further if they are dissatisfied with the Governing Body's response.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

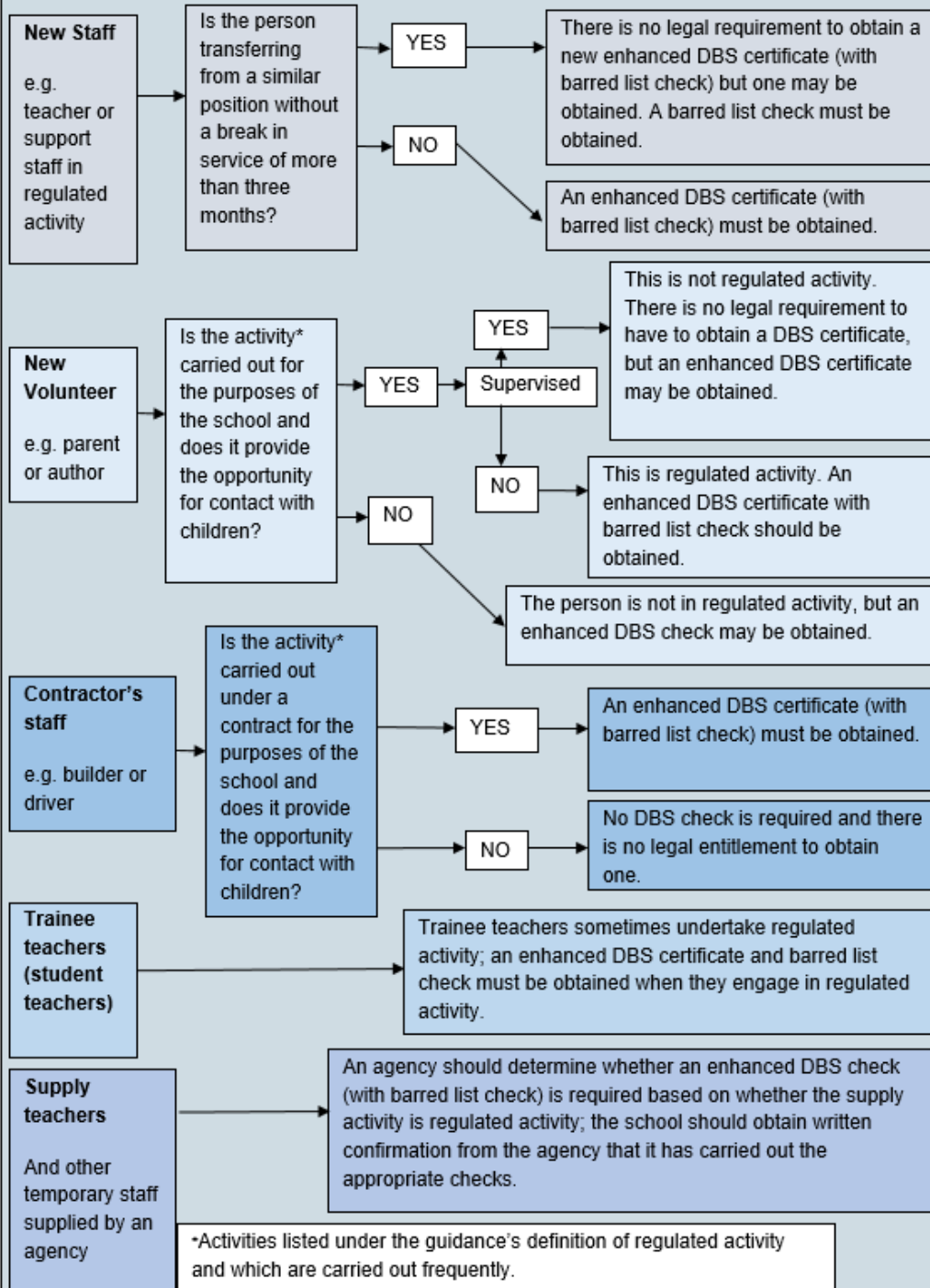
General guidance can be found at: [Advice on whistleblowing.](#)

The [NSPCC whistleblowing helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

APPENDIX A

Flowchart of Disclosure and Barring Service criminal record checks and barred list checks

FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS



APPENDIX B

Regulated activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government have produced a [factual note on Regulated Activity in relation to Children: scope](#).

Regulated activity includes:

a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children,

b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers;

Work under (a) or (b) is regulated activity only if done regularly.⁴⁵ Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes:

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

- personal care includes helping a child with eating and drinking for reasons illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;⁴⁶
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

APPENDIX C

IDENTIFYING CHILDREN AND YOUNG PEOPLE WHO MAY BE SUFFERING SIGNIFICANT HARM

Teachers and other adults in school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

Definitions

As in the Children Acts 1989 and 2004, a child is anyone who has not yet reached his/her 18th birthday.

Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another;

Development means physical, intellectual, emotional, social or behavioural development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

Abuse Child abuse is a term which describes all ways in which a child's development and health are damaged by the actions or inactions of others. Somebody may abuse or neglect a child by inflicting harm or 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 a stranger. They may be abused by an adult or adults or another child or children.

Often the different categories of abuse overlap, and many children suffer the effects of a range of destructive behaviour. In such cases, it is important to note clusters of signs as these may assume more significance than one indicator in isolation.

The key question which is asked when deciding whether or not a child is a victim of abuse is 'Is the child suffering or likely to suffer **significant harm?**'

Signs and Symptoms

One or more of these signs do not necessarily indicate that a child has been abused, but they may alert you to the fact that something is wrong.

Four Categories of Child Abuse

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

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

The UN Convention on the 'Rights of the Child' 1991 states:

“Children have the right to be protected from all forms of violence. They must be given proper care by those looking after them.”

“Children have a right not to be punished cruelly or in a way that would belittle them.”

Signs of Physical Abuse

- Fingertip bruising
- Grasp marks
- Implement marks
- Broken bones
- Bite marks
- Scalds and burns with clear outlines
- Bruising to the face or soft tissues, buttocks or torso
- Black eyes
- Unexplained injuries
- Injuries with conflicting explanations
- Self-destructive tendencies
- Aggression towards others
- Fear of physical contact – shrinking back if touched
- Speaking in monosyllables
- Fear of suspected abuser being contacted
- Afraid to go home
- A repeated pattern of injuries that seem unlikely to have been caused accidentally
- The child may become withdrawn and aggressive, lose confidence or be reluctant to discuss the injuries

Emotional Abuse is 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.

There is an element of emotional abuse in all forms of abuse, but some children may be emotionally abused whilst their physical care may be good.

Key elements of active emotional abuse are:

- Criticism
- Ridicule
- Withdrawal
- Rejection
- Hostility
- Threat
- Exploitation

Signs of Emotional Abuse

- Attention seeking behaviour
- Inappropriate behaviour to non-parental adults
- Chronic lack of self-esteem and self-confidence
- Regression
- Becoming withdrawn
- Sudden speech disorders
- Neurotic behaviour
- Threatened or attempted suicide
- Compulsively clean or neat
- Learning difficulties
- Over-reaction to mistakes
- Failure to make friends
- Development and learning delays
- Angry outbursts
- Over-compliance

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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.

Sexual abuse includes:

- Sexist remarks/suggestions
- Being taught indecent language
- Exposure to indecent material
- Indecent exposure
- Observing sexual activities
- Being forced to touch adults
- Indecent assault
- Digital penetration
- Group sexual activities
- Oral/anal/vaginal intercourse

Signs of Sexual Abuse

- Inappropriate sexual knowledge and behaviour in the child
- Unusual bleeding or discharge from the genitals
- Medical problems such as chronic itching or sexually transmitted diseases
- Bruising or bite marks around the genital area, bottom or thighs
- Self-harming
- Eating and sleeping disturbances
- Inability to concentrate/deterioration in performance at school.

- Regression to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Depression
- Anger/aggression
- Personality changes such as becoming insecure or clinging
- Isolated or withdrawn
- Low self-esteem
- Suicidal behaviour
- Starting to wet again; day or night/nightmares
- Inappropriate sexual behaviour towards other children and adults

The sexual abuse of children by other children is a specific safeguarding issue in education safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling,
- sexual violence and sexual harassment;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

Signs of Neglect

- Constant hunger
- Emaciation
- Poor hygiene
- Inadequate/poor state of clothing
- Untreated medical conditions
- Poor self-esteem
- Failure to thrive
- Destructive tendencies
- Socially challenging behaviour
- Poor growth and development
- Chronic tiredness
- Compulsive scavenging
- Arriving very early/leaving late
- Falling asleep in the classroom
- Frequent absences or lateness at school
- High levels of accidents
- Poor social relationships
- Poor hair condition, skin sores, etc.

Types of abuse and neglect include physical abuse, emotional abuse, sexual abuse and neglect. Some specific forms of abuse or safeguarding concern are outlined below:

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

This part of **appendix C** contains important additional information about specific forms of abuse and safeguarding issues.

Children and the court system

Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17-year olds.

They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Children missing from education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

There are many circumstances where a child may 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 go missing 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.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

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.

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Child sexual exploitation

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

- 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;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- 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);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- 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.

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Child criminal exploitation: county lines

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

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC- UK domestic-abuse signs symptoms effects](#)

[Safelives: young people and domestic abuse](#)

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation: [here](#).

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Faith

Certain kinds of child abuse linked to faith or belief. These include belief in witchcraft, spirit possession, demons or the devil and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation.

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Fabricated or induced illness

A rare form of child abuse, which may include parents or carers fabricating signs and symptoms of illness, falsifying medical records, letters or documents, or inducing illness.

Signs:

- Frequent and unexplained absences from school, particularly from PE lessons
- Regular absences for doctor's or hospital appointments

- Repeated claims by parent(s) that a child is frequently unwell and that he/she requires medical attention for symptoms which, when described, are vague in nature, difficult to diagnose and which teachers/ early years staff have not themselves noticed (for example, headaches, tummy aches, dizzy spells)
- Frequent contact with opticians and/or dentists or referrals for second opinions

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Self-Harm

Self-harm is any behaviour where the intent is to deliberately cause harm to one's own body for example:

- Cutting, scratching, scraping or picking skin
- Swallowing inedible objects
- Taking an overdose of prescription or non-prescription drugs
- Swallowing hazardous materials or substances
- Burning or scalding
- Hair-pulling
- Banging or hitting the head or other parts of the body
- Scouring or scrubbing the body excessively

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Female Genital Mutilation (FGM)

Also known as 'female circumcision'. Any FGM procedure on a woman or girl is unlawful under the Female Genital Mutilation Act 2003. It is also an offence under the Act for UK nationals or permanent residents to carry out FGM abroad, or to aid, abet, counsel or procure the carrying out of FGM abroad, even in countries where the practice is legal.

School staff are made aware of the risks of a girl having suffered FGM or be a risk of this. Victims of FGM are more likely to come from a community that is known to practise this activity. Staff should note that girls at risk of FGM may not be aware of the practice or that it may be conducted on them, therefore sensitivity should be shown when approaching the subject.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons.

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM

- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

The above indicators and risk factors are not intended to be exhaustive.

Section 5B of the female Genital Mutilation Act 2003 now places a statutory duty upon teachers and places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, 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. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Further guidance is available on the Harrow LSCB website and via a national helpline, which operates 24 hours a day, 7 days a week. The helpline details are 0800 028 3550 and emails sent to fgmhelp@nspcc.org.uk

Sexting

The term ‘sexting’ is derived from texting and refers to the sending of sexually provocative material (including photos, videos and sexually explicit text) from modern communication such as mobile phones, tablets, email, social networking sites and instant messaging services. Legal Implications for Students

Sexting may breach laws that prohibit the creation, distribution or possession of child pornography regardless of whether all parties involved consent to the images being taken and shared, or whether the images are sent to other minors, even minors of the same age.

Sexting can constitute a criminal offence and sexual harassment. It can also be considered a form of sexual exploitation and cyberbullying. This is especially the case where images are shared past the intended audience or when accompanied by nasty comments

All staff members are required to notify the Lead Designated Persons for Safeguarding and Child Protection immediately upon becoming aware that sexting by a student is likely to have occurred. The allegation will first be investigated by the Lead Designated Persons for Safeguarding and Child Protection and the parents of all students involved will be contacted. Staff members are not permitted to forward, copy or print any sexting images, however, if the nature of the sexting is deemed by the designated Person to be of a serious nature, the Police will be contacted, and the sexting will be reported to Children’s Services.

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage

Signs include:

- Absence and persistent absence
- Request for extended leave of absence and failure to return from visits to country of origin

- Fear about forthcoming school holidays
- Surveillance by siblings or cousins at school
- Decline in behaviour, engagement, performance or punctuality
- Not being allowed to attend extra-curricular activities
- Prevented from going on to further/higher education

This is a safeguarding and child protection issue. The school will ensure:

- All staff need to be aware of any signs that would indicate a pupil is concerned that they may be taken away.
- There are close checks on requests for holidays abroad or requests for leave of absence
- There is close monitoring of attendance and reasons for absence.
- All concerns regarding the possibility of Forced Marriage will be referred to the Duty and Assessment Team or the Forced Marriage Unit 0207 0080151 or out of hours 0207 0081500

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Political and Violent Extremism

In line with Government and local guidelines, the school is committed to protect the freedom of speech. However, we understand that we must challenge any extremist (and non-violent) ideas that are part of a terrorist ideology. We are committed to intervene to prevent students from being drawn into radicalisation and terrorism.

We have worked and will continue to work in partnership with a wide range of local and national agencies, including those responsible for PVE, to monitor, report and record any activity deemed inappropriate.

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Child Trafficking and Sexual Exploitation

Sexual exploitation can take many forms, ranging from seemingly “consensual” relationships to serious organised crime by gangs. It is exploitation if there is an imbalance of power in the relationship.

Sexual exploitation can involve varying degrees of coercion, intimidation or enticement, unwanted pressure from peers to have sex, sexual bullying (including cyberbullying) and grooming.

Sexual exploitation is a form of child abuse which involves children and young people receiving something in exchange for sexual activity.

Signs include:

- Going missing or regularly coming home late
- Regularly missing school or not taking part in education
- Appearing with unexplained gifts or new possessions

- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- A history of missing links
- Displaying inappropriate sexualised behaviour
- Signs of physical or sexual abuse

Staff should be aware that sexual exploitation can come from other children and young people either in or outside the school, as well as adults in a position of influence or trust.

The school will contact the local authority's children's social care when they are concerned that a child may have been trafficked.

LSCBs may offer schools training or briefing on child trafficking, and advice on what to do if children go missing from the school roll.

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Gangs and youth violence

Gangs are defined as a relatively durable, predominantly street-based group of young people who:

- See themselves (and are seen by others) as a discernible group
- Engage in criminal activity and violence
- Lay claim over territory
- Have some form of identifiable structural feature
- Are in conflict with other, similar gangs

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

[Extremism](#) is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

The relevant provisions of the Act will come into force on 12 Indicators that an individual is engaged in an extremist group, ideology or cause, include:

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance in accord with the group
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of material or symbols associated with an extremist cause (for example, the swastika for far-right groups)

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.¹⁰³ This duty is known as the Prevent duty.

The Prevent duty is part of the school's wider safeguarding obligations. Designated safeguarding leads and other senior leaders are familiar with the [Revised Prevent duty guidance: for England and Wales, especially](#) paragraphs 57-76 which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies. The school will provide access to Prevent awareness training, which will support staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

If staff have a concern they should discuss any such case with the **DSL** and who will involve social care as appropriate.

The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support

[Educate Against Hate](#), a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel guidance](#), and a Channel awareness e-learning programme is available for staff at: [Channel General Awareness](#).

The **DSL** is aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Peer on peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

Sexual violence and sexual harassment between children in schools and colleges

Context

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003/105 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A 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.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. 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.

Whilst not intended to be an exhaustive list, 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 and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

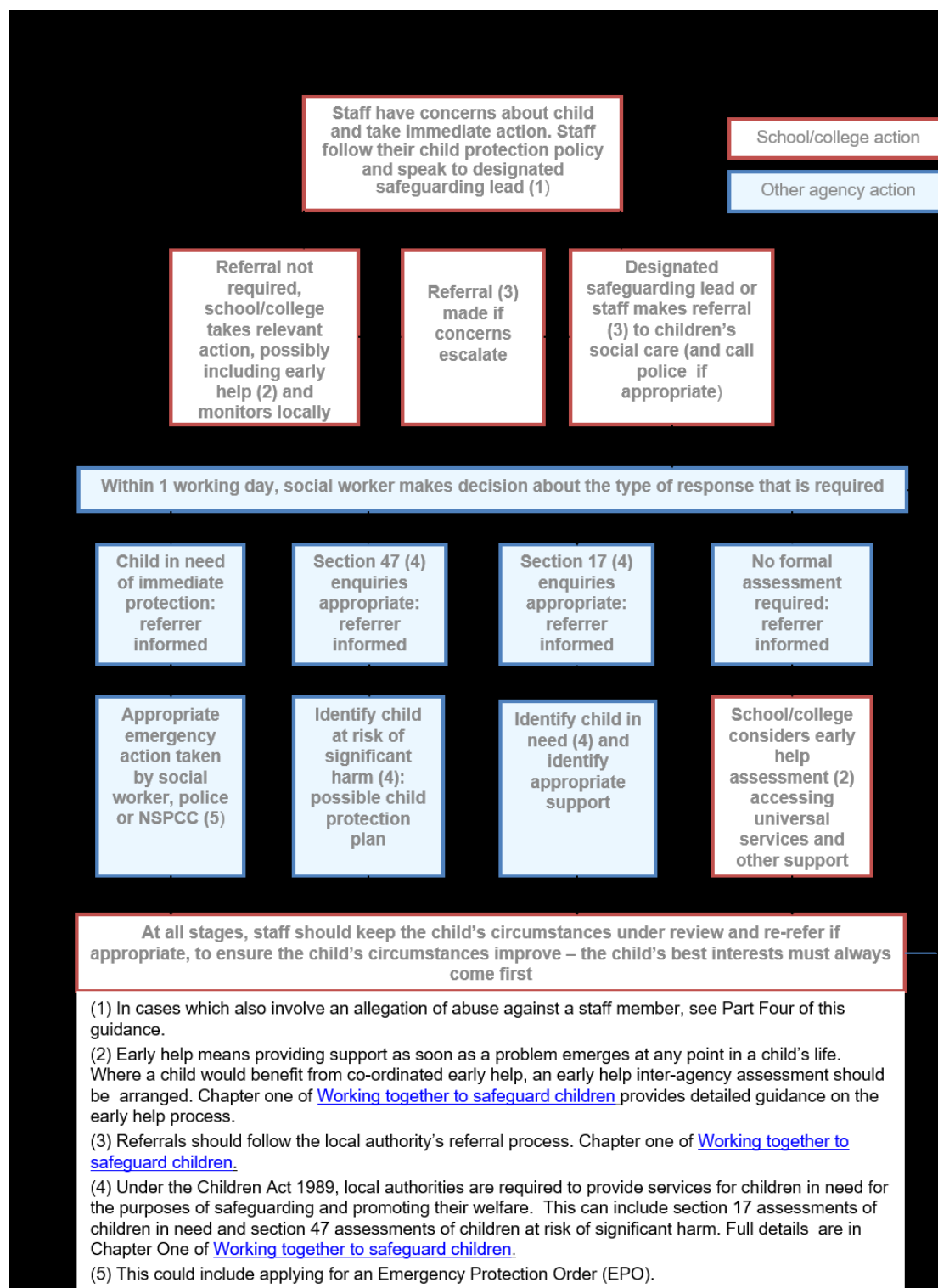
If staff have a concern they should discuss any such case with the DSL and involve social care or specialist services as appropriate.

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	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office website
Bullying	Preventing bullying including cyberbullying	DfE advice
Children and the courts	Advice for 5-11-year olds witnesses in criminal courts	MoJ advice
	Advice for 12-17 year old witnesses in criminal courts	MoJ advice
Children missing from education, home or care	Children missing education	DfE statutory guidance
	Child missing from home or care	DfE statutory guidance
	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults	Home Office guidance
	Child sexual exploitation: guide for practitioners	DfE
	Trafficking: safeguarding children	DfE and HO guidance
Drugs	Drugs: advice for schools	DfE and ACPO advice
	Drug strategy 2017	Home Office strategy
	Information and advice on drugs	Talk to Frank website

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention	Website developed by Mentor UK
"Honour Based Violence" (so called)	Female genital mutilation: information and resources	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance
	Forced marriage: information and practice guidelines	Foreign Commonwealth Office and Home Office
Health and Well-being	Fabricated or induced illness: safeguarding children	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience	Public Health England resources
	Medical-conditions: supporting pupils at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions	HCLG
Online	Sexting: responding to incidents and safeguarding children	UK Council for Child Internet Safety
Private fostering	Private fostering: local authorities	DfE - statutory guidance
Radicalisation	Prevent duty guidance	Home Office guidance
	Prevent duty advice for schools	DfE advice
	Educate Against Hate Website	DfE and Home Office
Violence	Gangs and youth violence: for schools and colleges	Home Office advice
	Ending violence against women and girls 2016-2020 strategy	Home Office strategy
	Violence against women and girls: national statement of expectations for victims	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges	DfE advice
	Serious violence strategy	Home Office Strategy

Appendix D Action where there are concerns about a child



Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

The school has an effective approach to online safety to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate. A commitment to E-Safety is an integral part of the safer recruitment and selection process of staff and volunteers

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

To ensure the E-safety of all students, we have developed good practice in internet use as a tool for teaching and learning is essential. The School internet access is designed expressly for student use and includes filtering and monitoring systems such as Impero, which limit children's exposure to the above risks from the IT system. These can be monitored from teacher stations

Students are taught what internet use is acceptable and what is not and be given clear objectives for internet use.

All staff receive E-Safety training. Staff must also understand that misuse of the internet may lead to disciplinary action (as detailed in section 5 of the HR Policies) and possible dismissal;

The **DSL and SBM (ICT)** are the appointed staff members Staff E-learning /who receive appropriate on-going training, support and supervision and works closely with the Designated Person for Child Protection

All temporary staff and volunteers are made aware of the school's E-learning /Safety Policy and arrangements;

Emerging technologies will be examined for educational use and a risk assessment will be carried out before use in School is allowed and methods to identify, assess and minimise risks will be reviewed regularly.

The "Three C's" (Content, Contact and Conduct) will be employed to determine and minimize risks associated with use of technologies with online access.

Further information and guidance can be found in the school's:
E-Safety and ICT Acceptable Use Policy in. of Remote and Mobile Technology

If staff have a concern they should discuss any such case with the DSL and refer to the E-Safety and ICT Acceptable Use Policy in. of Remote and Mobile Technology to report any Esafety incidents

Filters and monitoring

At The Jubilee Academy we have a lot of children who are vulnerable. As such it is very important that we create an online environment that protects our students whilst also giving them the flexibility to learn through their own ideas. We achieve this by carefully restricting access to the resources, online and locally on the school's internal network, that students have access to.

We use two pieces of software/hardware to restrict access. We have a Lightspeed [1] filter that all internet traffic passes through, this is a software installed on a piece of hardware. This filters all traffic by web address and/or IP address. We also have a software installed on every computer called Impero [2]. This is a monitoring software that also allows multiple ways of restricting content via keywords. It has the ability to prevent and log any attempts to access a website/file/program with restricted keywords providing a very powerful way to protect students from harmful content.

Both programs are very flexible and over the three years that The Jubilee Academy has been opened have been fine tuned to suit the school's needs. However, as education and ways of bypassing such programs is changing it is necessary to ready and able to further fine tune these programs.

Lightspeed has a suggested Web Filter 5-Point Check Up [3] which is useful to check a school is doing all it can to protect students.

These 5 points and how TJA adheres to these are as follows:

1. Force Safe Search
 - Using a built in Lightspeed tool and a local proxy installed on every PC that a student logs into, The Jubilee Academy Forces any use of a search engine to be done so through its safe search^{[4][5]} feature. This blocks content deemed unsuitable or offensive.
2. Force YouTube Safety Mode
 - The Jubilee Academy does not allow any access to YouTube (or similar video streaming websites such as Vimeo or DailyMotion) for students. It has been found that it creates a distraction for students and can disrupt lessons. However, staff have access to YouTube so that they can present educational videos where necessary. The keyword 'YouTube' is also blocked on student PCs via Impero to prevent students accessing any sites that may embed YouTube videos in order to bypass filters. Though Lightspeed does block these sites, this is just an added feature for security.
3. Block Unknown URLs
 - Within Lightspeed's filter, each known website is placed into a category. These categories are then filtered by suitability for Staff, Students or nobody. Any site that has not been assigned to a category is disallowed and cannot be accessed on any school device on the school's network.
4. Block P2P
 - By default, any traffic passing through a Lightspeed filter that has the properties of a Peer to Peer network [6] is blocked. There are a few exceptions that have been created specifically on the TJA filter to enable some educational software to function correctly.

5. Set Lockouts

- Lightspeed has the functionality to set lockout timers, as does Impero. These timers are only set for breaches that are deemed to be 'Major'. At present this designation is only triggered within Lightspeed when a student (or staff member) attempts to access a site in the adult category 3 or more times in under 5 minutes. This can be tweaked to trigger on other categories if deemed necessary.

All student iPads have the same proxy installed as student PCs and go through the same filters. We also have mobile device management (provided by lightspeed) [7] that allows us to control the apps that are installed on each iPad and prevents students from deleting or installing their own apps.

We have policies and guidelines in place that explain what school devices should and should not be used for and both Staff and Students sign an agreement based off these policies each year.

Further information and guidance can be found in the school's:
E-Safety and ICT Acceptable Use Policy in. of Remote and Mobile Technology

References

- [1] [Lightspeed Systems](#)
- [2] [Impero Software](#)
- [3] [Lightspeed Web Filter 5-Point Check Up](#)
- [4] [Google Safe Search](#)
- [5] [Bing Safe Search](#)
- [6] [Peer to Peer \(Wikipedia\)](#)
- [7] [Lightspeed MDM](#)

APPENDIX E

‘Record of Concern’ pro forma

Student’s Name:			
Student’s DOB:			
Male/Female:	Ethnic Origin:	Disability Y/N:	Religion:
Date and time of concern:			
Your account of the concern:			
Additional information: (your opinion, context of concern/disclosure)			
Your response: (what did you do/say following the concern)			
Your name:			
Your signature:			
Your position in The Jubilee Academy:			
Date and time of this recording:			
Action and response of DSL			
Name: _____		Date: _____	

