



CHILD PROTECTION POLICY AND PROCEDURES (SAFEGUARDING)

GB Committee Responsible

Reviewed by:

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Next Review Date:

Board of Directors

Debbie Ferrer

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This Policy is informed by the following:

- DfE: [Keeping Children Safe in Education 2024](#)
- DfE: [Working Together to Safeguarding Children](#) 2023
- [Serious Crime Act 2015](#)
- [The Prevent Duty](#), updated March 2024
- [Glossary of Terms](#) updated March 2024
- DfE: [Use of reasonable force in schools](#), July 2013
- DfE: [Mental Health and Behaviour in Schools](#), November 2018
- DfE: [Teaching Online Safety in Schools](#), updated 12th January 2023
- DfE: [Searching, screening and confiscation at school](#), July 2022
- DfE: [Meeting digital and technology and standards in Schools and Colleges](#), March 2023
- UK Safer Internet Centre: [A Guide for Education Settings and Filtering Providers](#), June 2022
- [Domestic Abuse Act](#), 2021
- OFSTED – [Review of sexual abuse in schools and colleges](#) (June 2021)
- [Marriage and Civil Partnership \(Minimum Age\) Act 2022](#)
- [Multi-agency statutory guidance for dealing with forced marriage](#) (July 2022)
- [Sharing Nudes and semi-nudes: advice for education settings working with children and young people](#) (UKCIS December 2020)
- [The Equality Act](#) 2010
- [Human Rights Act 1988](#)
- [Working together to improve school attendance](#) (August 2024)
- [Online Safety Bill](#), July 2023
- [PACE C code 2019](#) (Appropriate Adult Guidance)
- [Education Against Hate](#)
- [Multi-agency statutory guidance for dealing with forced marriage July\(2022\)](#)
- [County Lines: Toolkit for Professionals](#)
- [Marie Collins Foundation: Sexual Abuse Online](#)
- [Supporting Young People who have Suffered from Sexual Abuse](#)
- Summary of responsibilities where a mental health issue is affecting attendance and examples of effective practice

And should be read in conjunction with the following Policies:

- Allegations of Abuse Against Staff
- Supporting Students with Medical Conditions
- IT
- Anti-Bullying
- Behaviour for Learning, Exclusion and Suspension
- Bentley Wood High School Suite of HR Policies
- Attendance and Punctuality
- Health and Safety Policy
- Preventing Extremism and Radicalisation (updated January 2024)
- Relationships and Sex policy
- Young Carers
- Whistleblowing (from the Suite of HR Policies)
- British Values Statement
- Equality information and objectives
- Inclusion Policy

Key Roles and Responsibilities:

Role:	Name and contact details:
Designated Safeguarding Lead (DSL)	Debbie Ferrer: dferrer@bentleywood.harrow.sch.uk
Alternate DSL(s)	Naseema Akbar nakbar@bentleywood.harrow.sch.uk
Named safeguarding governor	Alison Moore amoore@bentleywood.harrow.sch.uk
Chair of Governors	Raakhi Patel rpatel@bentleywood.harrow.sch.uk
School online safety Lead	Hary Ilanko hllanko@bentleywood.harrow.sch.uk
Designated teacher for Children in Care and children previously in care (CiC)	Debbie Ferrer dferrer@bentleywood.harrow.sch.uk
Senior Mental Health Lead	Francis O Sullivan fosullivan@bentleywood.harrow.sch.uk

The following policy and procedure apply to all governors, staff and volunteers working in our school. We also ensure contractors are aware of the child protection policy and the school take the same responsibilities as they do for staff, volunteers and agency staff.

Legislative Framework:

*“Safeguarding and promoting the welfare of children is **everyone’s** responsibility. All staff should make sure that any decisions made are in the **best interests of the child.**” KCSIE*

Bentley Wood High School is fully committed to meet its responsibility to protect and safeguard the welfare of children and young people in its care. We recognise the important part we have to play in identifying children and young people at risk of abuse and neglect and in securing appropriate support for them and their families. ‘Children’ includes everyone under the age of 18.

Safeguarding and promoting the welfare of children and young people means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, **whether that is within or outside the home, including online** (this last part has been added)
- Preventing the impairment of children’s mental and physical health or development
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

NB: This is now in line with the Working together to safeguard children 2023 guidance.

‘A child centered and coordinated approach to safeguarding’

The child’s best interests will remain our paramount focus and this is best achieved by Bentley Wood High School working within the context of the following statutory duties and government guidance which require effective inter-agency cooperation:

- **Section 175** of the **Education Act 2002** places a statutory duty on the governing body to have policies and procedures in place that safeguard and promote the welfare of children who are pupils of the school.
- **Section 11** of the **Children Act 2004** sets out the arrangements that schools and other specified settings must make to safeguard and promote the welfare of children. These arrangements are outlined within this document so that all staff, families and the local community are provided with a

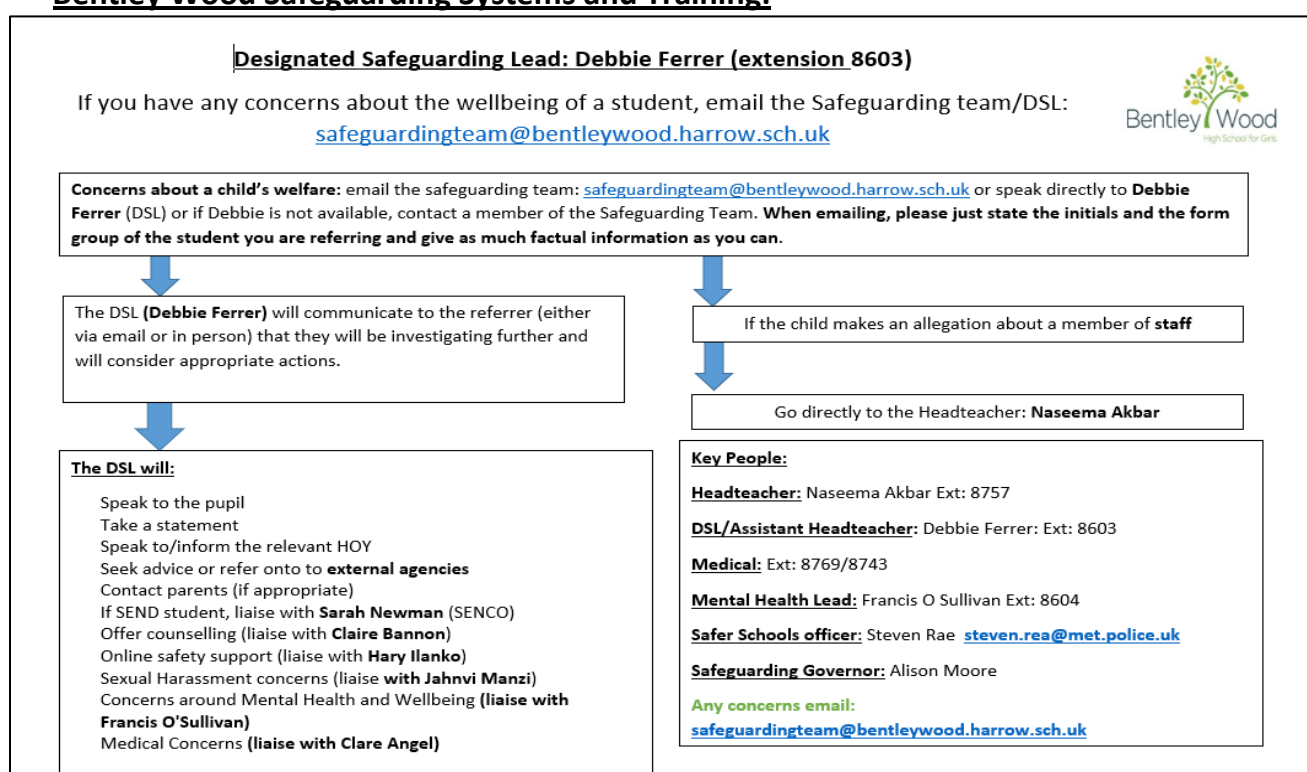
clear understanding of our school's processes and commitment to safeguard and promote the welfare of children and young people in our care.

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area
-

Bentley Wood Safeguarding Systems and Training:



All parents are made aware of the school's Safeguarding Policy via the website. In order to ensure all staff are clear of our expectations in relation to safeguarding, our Safeguarding Policy is reviewed annually and all new members of staff given safeguarding training as part of their induction.

If any member of staff has a safeguarding concern, they are instructed to email the Safeguarding Team: safeguardingteam@bentleywood.harrow.sch.uk without delay (see systems laid out above).

Whole Staff and Governor's Induction and Training:

If staff have a safeguarding concern, they are to follow the procedures laid out above

Safeguarding is the responsibility of all staff at Bentley Wood High School. Staff are required to read the most recent version of 'Keeping Children Safe in Education' on a yearly basis (more often, if any updates are released) and confirm that they have done so and are made aware, through regular CPD training, of their responsibilities, including online safety. In addition to this, ongoing safeguarding training is given through updates six times a year with Teach Talks and, weekly updates in the whole staff bulletin.

Bentley Wood High School's Safeguarding Team 2024-2025

The following members of staff are part of the Safeguarding Team:

- *Debbie Ferrer: Assistant Head teacher/Designated Safeguarding Lead*
- *Naseema Akbar: Head teacher*
- *Sarah Newman: Assistant Headteacher/SENCO*
- *Hary Ilanko: Assistant Headteacher/Online Safeguarding*
- *Claire Bannon: Associate Assistant Head teacher/ Counselling*
- *Jahnvi Manzi: Associate Assistant Head teacher/Sexual Harassment/PSHE/RSE*
- *Heidi Weaver: Assistant Headteacher (mat leave)*
- *Ellie Gill: Safeguarding Assistant and Inclusion Support*
- *Clare Angel: Senior Welfare Officer*

Additional Key Colleagues:

- *Bijal Ahmed: Attendance Officer*
- *Mellania Williamson-Taylor: Harrow Virtual School Headteacher*
- *Gavin Baker: Education Lead – MASH Team (Harrow)*
- *Alison Moore: TBWT Safeguarding Lead and Bentley Wood High School's Safeguarding Governor (2024-2025).*
- *Francis O Sullivan (Bentley Wood's Senior Mental Health Lead)*

All members of the **Safeguarding Team/DSL** and the **SENCO** have undertaken Safeguarding Training at level 3 or above and supports the DSL with the gathering information, ensuring record keeping is up to date, working with families and making referrals to external agencies.

In addition, our **Attendance Officer** works closely with external organisations in regard to liaising with families with regard to poor attendance at school or for children who are deemed to be missing in education. All **Heads of Year** are also trained to at least level three and support the safeguarding team when gathering information, working with families and making referrals. All members of the **Senior Leadership Team** are also Level 3 trained, with the Head teacher, the DSL and the Deputies also trained in safer recruitment (Level Four).

All staff members are made aware of their safeguarding duties through their induction training. This includes:

- Read the latest [Keeping Children Safe in Education 2024 \(Section 1 and Appendix B\)](#)
- Being made aware of the safeguarding team/DSL and reporting procedures;
- Aware that safeguarding concerns can happen in or outside of the setting as well as online and the need for an "it could happen here" approach;
- being made aware of the role of the designated safeguarding lead, the head teacher and the Chair of Governors.

Additionally, every member of staff can make a referral to children's social care themselves, but if they do so, must inform the Designated Safeguarding Lead (Debbie Ferrer) at the earliest opportunity. The number for Harrow Children's Services is: 020 8901 2690.

Safeguarding is everyone's Responsibility:

- It is the responsibility of every member of staff and volunteer at Bentley Wood High School to know, understand and follow our Child Protection and Safeguarding Policy and Procedure. They should maintain an attitude of **'it could happen here'** where safeguarding is concerned and know what to look for.
- If any member of staff or volunteer is concerned about a child s/he must inform The DSL immediately. They must record information regarding the concerns on the same day. The written record must be a clear, precise, factual account of the observations or what has been said.
- Where there is a child protection concern, allegation or disclosure the DSL will make an immediate call to Children's Social Care to alert or to consult with them. The Multi Agency Referral Form will be sent by the DSL.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the safeguarding team/senior leadership team and/or take advice from Children's Social Care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.
- If a member of staff disagrees about the level of concern and feels that a child has not been protected, then any member of staff can make a direct referral to Children's Social Care – refer to HSCB guidance on multi-agency resolution of professional disagreements
- Within one working day of a referral being made, Children's Social Care should acknowledge receipt to the referrer and decide about the next steps and the type of response that is required. The referrer should follow up if this information is not forthcoming.
- If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the DSL as required).
- If, after a referral, the child's situation does not appear to be improving, the referrer should consider following the HSCB guidance on multi-agency resolution of professional disagreements to ensure that their concerns are addressed and, most importantly, that the child's situation improves.
-

When concerned about a child:

All staff and volunteers should be aware that the main categories of abuse include, Physical, Emotional, Sexual Abuse and Neglect (see Appendix 4). Training should equip staff to help identify the indicators of harm, but in general in an abusive relationship a child may:

- Appear frightened of a parent or others in the household e.g. siblings; appear frightened of someone outside of the home, including a peer. This includes within the school setting;
- 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 cultural backgrounds);
- Display insufficient sense of boundaries or lack stranger awareness;
- Appear wary of adults and display a 'frozen watchfulness' or appear noticeably withdrawn.

Dealing with a disclosure:

If a child discloses that he or she has been abused or neglected, the member of staff or volunteer should:

- Listen to what is being said without displaying shock or disbelief, allowing the child to talk freely and at their own pace;
- The School operates *"with the best interests of the child at heart"* and there are suitable means by which children can say what is happening to them and know that they will be heard.
- Students will speak to a 'trusted adult' in order to be able to confidently report abuse, and know their concerns will be treated seriously.
- Reassure the child, but do not make promises, particularly about maintaining confidentiality – it might be necessary to refer to other agencies;

- Reassure the child that they are not at fault and they were right to tell someone;
- Listen and only ask questions when it is necessary to obtain clarification;
- Do not criticise the alleged perpetrator;
- Ask the student to write a written statement. If the student does not want to write a statement, then staff can write it (with the student dictating) for them. Make sure the student signs and dates the statement.
- Pass the information to the DSL/safeguarding team straight away

Confidentiality and Communicating with Parents:

[Children and Social Work Act 2017](#) brought about a new partnership arrangement to safeguard children. [Harrow Safeguarding Partnership Arrangement](#) oversees a collaborative approach by Harrow Safeguarding Children Board and Harrow Safeguarding Adults Board in order to promote a 'Think Whole Family' approach to safeguarding. As a relevant agency Bentley Wood High School is committed to fulfilling its statutory duty to engage with these arrangements

All staff in schools have a responsibility to share relevant information about the protection of children with other specified professionals, particularly investigative agencies (Children's Social Care and the Police). Parents are made aware of the school's Safeguarding and Child Protection Policy and Procedures (these are available on our school's website). *Parents should be informed prior to referrals being made to other agencies, unless to do so might place the child at further risk or cause evidence to be removed or destroyed. **N.B.** Informing parents does not require seeking their consent to share the information with professionals who need to know.*

If a child confides in you and requests that the information is kept secret, it is important to tell the child in a sensitive manner and appropriate to their development that you cannot promise complete confidentiality, but explain what you will do next and that information will only be shared with those who need to know in order to help. All staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to Children's Social Care.

Staff/volunteers who receive sensitive information about children and their families should only share information with appropriate professionals. The DSL will ensure that our school's information sharing arrangements comply with the DfE's [Information Sharing: Guidance for Practitioners](#). Any written communications containing sensitive information must only be sent to other professionals on a need to know basis using secure mail processes e.g. secure email.

Whistleblowing:

Any member of school staff should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and that such concerns will be taken seriously by the Senior Leadership Team. Where a staff member feels unable to raise an issue with the Senior Leadership Team or feels that their genuine concerns are not being addressed, other whistle-blowing channels are available: <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>. Further information on whistle blowing can be found in the School's [Whistle Blowing Policy](#) published on the School Website.

Contextual Safeguarding

We recognise that some safeguarding incidents or behaviours are associated with wider environmental factors which relate to children and young peoples' neighbourhoods and/or online communications. Contextual Safeguarding expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts. For further information see the University of Bedfordshire's [Contextual](#)

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: 020 8424 0999
Police	101 or for emergency: 999
Harrow Safer Schools Team	0208 733 3412 Mobile 07990 782 14 NWMailbox.SchoolsHarrow@met.police.uk
FGM - Mandatory reporting	Police on 101
Local Authority Designated Officer for Allegations against staff (LADO)	Initial referrals via MASH/ Golden Number above. (For on-going 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	www.harrowlscb.co.uk
NSPCC	0800 800 5000
Childline	0800 1111
Government’s Whistle-blowing Service via NSPCC Report Line	0800 0285

Harrow Attendance Team:

Name	Role	Contact details
Raj Parmar	Head of Service	020 8416 8286 Raj.Parmar@harrow.gov.uk
Sherifa Clarke	Attendance & Alternative Provision Manager	07521000470 Sherifa.Clarke@harrow.gov.uk
Collette McDonagh	Court Attendance Officer	07762000505 Collette.Mcdonagh@harrow.gov.uk
Pragna Bhatt	Lead Officer for Children Missing Education & Child Employment	07875197508 Pragna.bhatt@harrow.gov.uk
Heather Richardson	Attendance Officer	07707153172 Heather.Richardson@harrow.gov.uk
Nalayini Gajan	Attendance Officer	07707153280 Nalayini.Gajan@harrow.gov.uk
Shereen Maitland	School Attendance Liaison and EHE Officer	07762000506 Shereen.Maitland@harrow.gov.uk
Solomon Mwangi	Attendance Support Officer	07756295569 Solomon.Mwangi@harrow.gov.uk

Responsibilities: The Bentley Wood Trust and Governors

In KCSIE 2024 it states:

“Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction.

This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.”

In addition, KCSIE 2024 states:

“Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998 , [the Equality Act 2010](#), (including the Public Sector Equality Duty²³), and their local multi-agency safeguarding arrangements.”

It is the responsibility of our Local Committee and The Bentley Wood Trust Board to ensure that our school complies with its legislative duties and has regard to Government guidance *Keeping Children Safe in Education 2024* to ensure that our school’s policies, procedures and training are effective and comply with the law. This responsibility includes understanding the local criteria for action and assessment and supplying information as requested by the three safeguarding partners (Local Authority, Police and Clinical Commissioning Group).

Our Local Committee and Trust Board will:

- Designate a lead governor for child protection and safeguarding at a Local Level who will oversee the school’s policy and practice and champion safeguarding issues. Ensure there is a MAT Safeguarding Lead at Trust Level.
- Nominate a member of the Local Committee (usually the Chair) to be responsible in the event of an allegation of abuse made against the Headteacher.
- Ensure that the school has a Designated Safeguarding Lead (DSL) within the senior management team.
- Ensure that policies and procedures are in place, which are compliant with government guidance and local
- Safeguarding Partnership Arrangements: These should be reviewed annually and staff should be encouraged to contribute to their development. These should be made available publicly via the website or other means.
- Ensure that all staff and volunteers access appropriate levels of child protection and safeguarding induction and training, including online safety. In addition, all staff should receive regular safeguarding and child protection updates (e.g. via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Liaise closely with the Designated Safeguarding Lead and receive regular reports to monitor procedures and practice and ensure compliance.
- Ensure that staff understand the process and principles for sharing information, including the
- Data Protection Act 2018 and the General Data Protection Regulations (GDPR) 2016.
- Ensure that safe recruitment procedures are in place and are applied for all staff and volunteers to ensure suitability to work with children, including the requirement for at least one person conducting an interview to have completed safer recruitment training. See ‘Recruitment’ in Bentley Wood High School’s Suite of HR Policies.
- Ensure that Allegations Management procedures are in place and embedded across the school.
- Ensure that other related procedures are in place and embedded e.g. the staff Code of
- Conduct, Acceptable Use Policy.
- Ensure that appropriate responses to children who go missing from education/absent from education, particularly repeat occasions are in place to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems

in pupils, including clear routes to escalate concerns and clear referral and accountability systems.

- Ensure that other related procedures e.g. FGM, Anti-bullying – Peer on Peer abuse, Preventing Radicalisation, Trafficking and Modern Day Slavery are in place and embedded (see Appendix 1: Further Information – Safeguarding Children in Specific Circumstances).
- Ensure any deficiencies in safeguarding arrangements are remedied without delay.
- Ensure that staff are equipped to respond to the needs of vulnerable children including those with disabilities and those who are Looked After by the Local Authority.
- Ensure that the curriculum supports children in recognising and responding to risks, including ICT.
- Take a proportionate risk-based approach to the level of information that is provided to temporary staff and volunteers.

The Designated Safeguarding Lead's responsibility

The Designated Safeguarding Lead, **Debbie Ferrer**, will take responsibility for all child protection referrals and ensure that adequate information is sought to enable a decision to be made on whether to refer the matter to Children's Services when there is a significant concern. She will be responsible for ensuring all referrals are completed in a timely manner and followed up to ensure the well-being and safety of the child. If after a referral the child's situation does not appear to be improving, she will press for re-consideration to ensure all concerns have been addressed.

ALL referrals should be sent in to MASH – e-mail: duty&assess@harrow.gov.uk

It is recognised that any matter concerning child protection is confidential, and the Designated Safeguarding Lead will disclose any information on a need to know basis only.

All parents will be made aware of the Designated Safeguarding Lead's responsibility with regard to safeguarding referrals when their child starts at the school and of how to raise a concern regarding safeguarding with the school. The DSL will liaise with the three safeguarding partners (Local Authority, Police and Clinical Commissioning Group) and work with other agencies in line with *Working Together to Safeguard Children (2018)*.

Our DSL (Debbie Ferrer) will:

- Undergo training to provide them with the knowledge and skills required to carry out the role. Training should be updated every two years with regular updates (at least annually) on developments in between, e.g. via e-bulletins, forums for DSLs, and reading time, to keep up with any developments relevant to their role.
- Act as focal point for staff concerns and liaise with the Local Authority and other agencies in accordance with [*Working Together to Safeguard Children 2023*](#)
- Refer all cases of suspected abuse to Harrow Children's Social Care via the Multi-Agency Safeguarding Hub (MASH).
- Refer all cases to the police where a crime has been committed.

Thresholds for Intervention:

The DSL will decide upon the most appropriate course of action and whether the concerns should be referred to Children's Social Care – refer to [*Harrow Thresholds Guidance*](#). If it is decided to make a referral to Children's Social Care the parent will be informed, unless doing so would place the child at further risk or undermine the collection of evidence e.g. obtaining forensic evidence. All concerns, discussion and decisions will be recorded in writing.

The DSL will provide guidance on the appropriate action. Options will include:

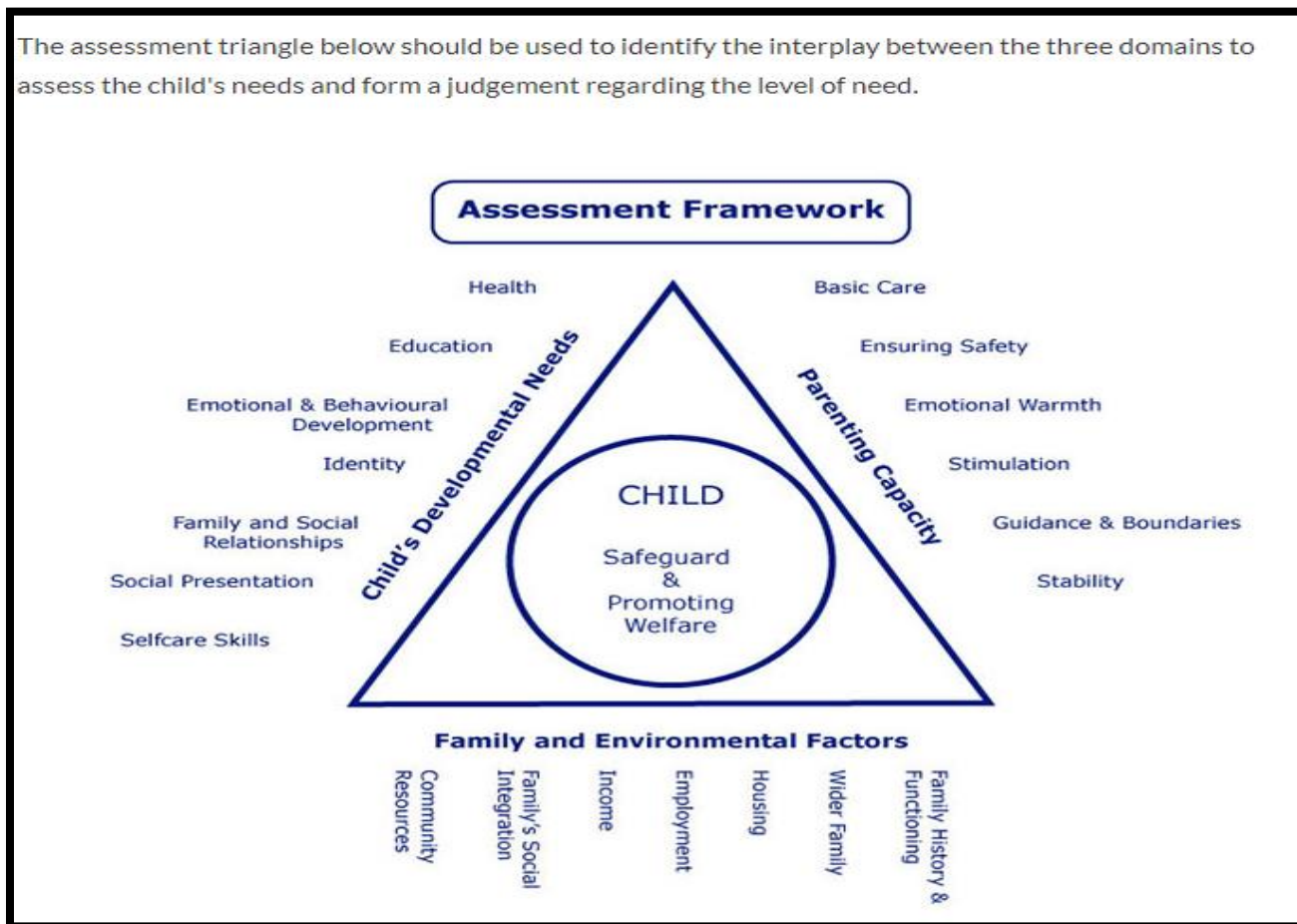
- Managing any support for the child internally via the school's own pastoral support processes;
- An early help assessment or;
- A referral for statutory services e.g. the child is or might be in need or suffering or likely to suffer harm.
- **Early Help** - If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.
- **Children in Need** – A child in need is defined under the *Children Act 1989* as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. The Local Authority is required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the *Children Act 1989*.
- **Children suffering or likely to suffer significant harm** - Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the *Children Act 1989* if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.
- **Children Missing from Education/Absent from Education** - being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation

Referrals: If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. (see appendix 5)

If the child's situation does not seem to be improving after the referral, the DSL will escalate through local escalation procedures or contact Gavin Baker (Harrow Education Lead) to ensure their concerns have been addressed and that the child's situation improves.

Harrow's Referral Assessment Framework is below and click [here](#)

The assessment triangle below should be used to identify the interplay between the three domains to assess the child's needs and form a judgement regarding the level of need.



Supporting Vulnerable Children

- We recognise that without appropriate intervention and support, abuse or witnessing violence may have an adverse impact on children which may last into adulthood.
- Our school will support pupils through:
- Curricular opportunities to encourage self-esteem and self-motivation;
- An ethos that actively promotes a positive, supportive and safe environment and values the whole community;
- Liaison with other agencies which support the pupil such as Social Care and Child and Adolescent Mental Health Services (CAMHS);
- Our school's behaviour policy will support vulnerable pupils in the school. Our staff will agree a consistent approach that focuses on the behaviour of the child but does not damage the pupil's sense of worth.

Record Keeping:

When a child protection concern has been identified, reported or disclosed, A senior member of the DSL/Safeguarding Team should:

- Record concern as soon as possible using CPOMS.
- Not destroy any original notes/scan into CPOMS– these are sometimes required by a court.

- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child.
- Record statements and observations rather than interpretations or assumptions.
- Make a record of all concerns, discussions and decisions made, and the reasons for those decisions. If in doubt about recording requirements, staff should discuss with the DSL.
- If there are paper copies of disclosures, sign and date your notes

The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information - England) Regulation 2005.

Transfer of files/records:

In KCSIE 2024 it states: *“Where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives.”*

When a child leaves our school, the DSL (Debbie Ferrer) will ensure that their child protection file (if the student has one) within the timespan stipulated in KCSIE 2024, securely to the new school or college. Debbie Ferrer will also ensure that the relevant member of staff in the new establishment is made aware. For further guidance see HSCB Guidance on the transfer of a CP or Safeguarding file to another educational setting.

Information Sharing:

Information sharing is vital in identifying and tackling all forms of abuse and neglect. The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. Fears about sharing information **must not** be allowed to stand in the way of the need to promote welfare and protect the safety of children. Further advice can be found on the Information Commissioner’s Website and in particular the [ICO Guide to Data Protection](#) which includes guidance on the GDPR.

The Headteacher’s Responsibility:

The Headteacher will ensure that the Safeguarding Policy adopted by the Local Committee and The Bentley Wood Trust Board is fully implemented and followed by all staff. In addition, she will ensure that sufficient resources and time are allocated to enable the Designated Teachers to discharge their responsibilities and ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children. Such concerns will be addressed sensitively and effectively in a timely manner, in accordance with agreed whistle blowing policies. The Headteacher plays a key role in the managing of allegations against staff and volunteers.

The Headteacher will also coordinate any allegations against a member of staff. If the allegation concerns the Headteacher, this will be referred to the Chair of Governors. An allegation against the Chair of Governors should be reported directly to the LADO. **Harrow’s LADO’s contact details: Cheryl Walters 07783 875639 and Rosalind South: 07871 987254. Email: lado@harrow.gov.uk** The Headteacher will make a record of concerns raised in regards staff concerns in a confidential log.

Whistleblowing:

All staff and volunteers at our school should feel able to raise concerns about poor or unsafe practice and potential failures in the school’s safeguarding regime and know that such concerns will be taken seriously by our senior leadership team. All staff are to be made aware of their whistle-blowing responsibilities and promptly report any concerns in the interests of protecting children and staff from poor practice and or unsuitable behaviour. This includes the requirement to self-disclose any personal information which may impact on their suitability to work in an education setting.

Where internal reporting arrangements are viewed not to have been taken seriously or with sufficient rigour, any member of staff can raise concerns externally if the matter is not resolved by the Headteacher or Chair of Governors e.g. via the Local Authority's Designated Officer for Managing Allegations; the HSCB or the Government's Whistle-blowing report line: **0800 028 0285** or help@nspcc.org.uk

Early Help assessment:

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

What all staff should look out for:

- Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:
- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is showing signs of being involved in inappropriate or dangerous behaviour online
- is frequently missing/ goes missing from care or from home or attendance to school raises a concern
- is at risk of modern slavery, trafficking or exploitation, or FGM
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse, or a parent in prison
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- Inappropriate comments on the school's Microsoft Teams Platform
- is a privately fostered child
- Is in temporary or long term foster care

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. *Any Early Support referral to Harrow goes to: Duty.Assess@harrow.gov.uk*

Early Support Hubs are made available to parents via the school website and communicated via email:

Harrow Early Support Hubs	https://www.harrow.gov.uk/childrens-social-care/early-support-hubs Tel: 0208 901 2690
Brent Early Help Service	https://www.brent.gov.uk/children-young-people-and-families/support-for-parents-and-families/early-help-service#whatistheearlyhelpservice Tel: 0208 937 3019
Families First (Hertfordshire)	https://www.hertfordshire.gov.uk/microsites/families-first/families-first.aspx Tel: 01438 737575
Barnet Early Help	https://www.barnet.gov.uk/children-and-families/early-help-children-young-people-and-families Tel: 0208 359 2000

Concerns about Extremism:

Staff must Inform the DSL/a member of the Safeguarding team as soon as possible a Where there is a concern, the

DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government’s programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children’s social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- **Think someone is in immediate danger**
- **Think someone may be planning to travel to join an extremist group**
- **See or hear something that may be terrorist-related**

If in exceptional circumstances the DSL/safeguarding Team/SLG is not available, this should not delay appropriate action being taken. Staff must a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ section). Then inform the DSL as soon as possible,

Concerns around mental health

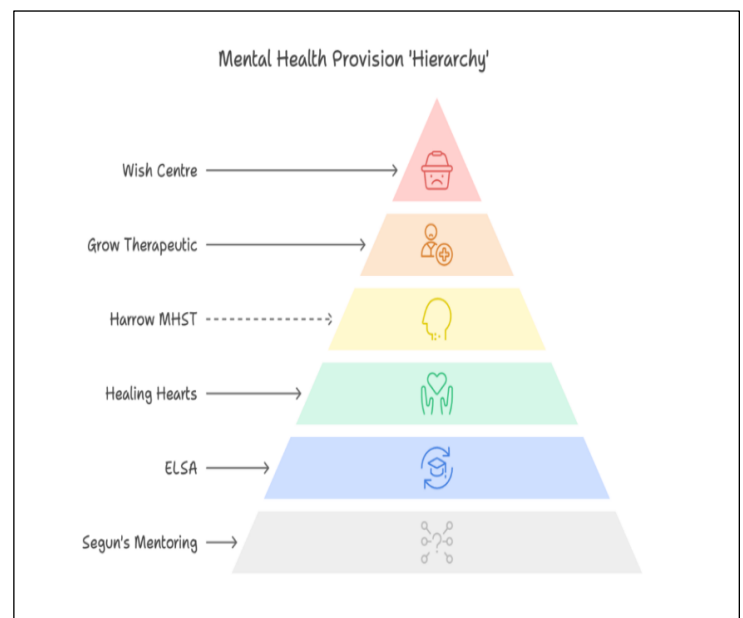
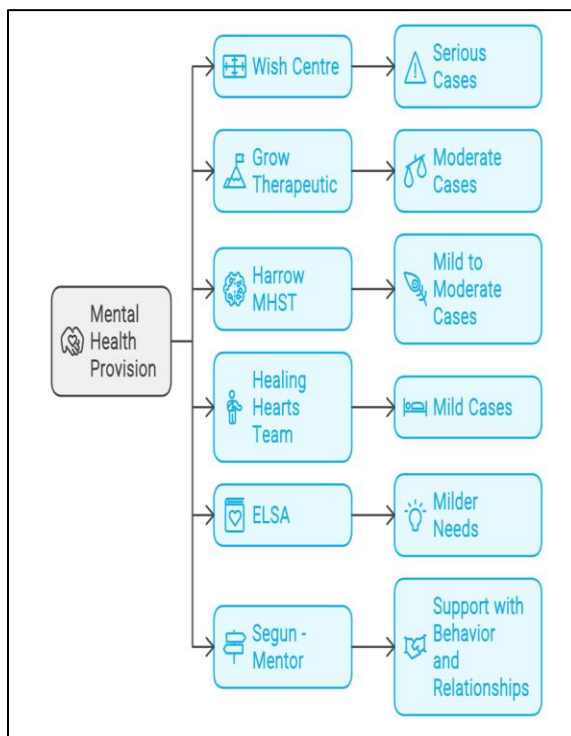
Children requiring mental health support: All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation.

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

Staff who have a mental health concern about a child that is also a safeguarding concern will act in line with this policy and speak to **Francis O Sullivan, Claire Bannon, Debbie Ferrer** or a member of the Safeguarding Team.

The school will access a range of advice to help them identify children in need of additional mental health support, including working with external agencies. and has a comprehensive counselling support network, working with **GROW, Harrow Horizons, The Wish Centre** and **CAMHs** to support our students and their families. If you have a

mental health concern, the school has a number of in school support pathways available



Concerns around risk or potential FGM:

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

The school will **immediately** report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose,

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Staff must then speak to a member of the safeguarding team/senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible. Make a referral to local authority children’s social care directly, if appropriate, Share any action taken with the DSL as soon as possible.

Safer Workforce

- **Safer Recruitment** – Bentley Wood High School has a separate *Safer Recruitment Policy* which specifies how all staff and volunteers must be recruited, following robust recruitment and selection process, including DBS and thorough reference checks. The aims of the Safer Recruitment Policy are to help appoint the most suitable people to work with our pupils and to deter, reject or identify people who might harm pupils or are otherwise unsuitable to work or volunteer in our school.
- **Safer working practice** - All school staff and volunteers should take care not to place themselves in a vulnerable position with a child. Bentley Wood High School’s Staff Code of Conduct and forms part of our School’s compulsory training for all staff and volunteers. Click here for further guidance [Professional and Personnel Relationships\(saferrecruitmentconsortium.org\)](https://www.saferrecruitmentconsortium.org)
- **Managing allegations against staff and volunteers** - Any allegation against a member of staff or volunteer, as described below, must be reported to the **Headteacher** without delay. (Appendix 3)

This part of the guidance relates to members of staff, supply staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Where an allegation is made against the Headteacher, the matter must be reported immediately to the Chair of

Governors, or the Vice-Chair in his/her absence, without notifying the Headteacher first.

Where a member of staff or volunteer may have:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with children.

In addition, we ensure that staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the [Sexual Offences Act 2003](#).

Our school will also ensure that any member of staff facing an allegation will be provided with support, including a named contact if they are suspended. We will work effectively with the LADO to help ensure that the matter is dealt with as quickly, fairly and consistently as possible in the interests of all concerned. 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. Confidentiality should not be promised and information should be shared on a 'need to know' basis only. An immediate written record of the allegations should be made, including time, date and place where the alleged incident took place, with brief details of what was said to have happened. This record should be signed and immediately passed on to the Headteacher (or Chair of Governors if the allegation is made against the Headteacher).

The Headteacher or Chair of Governors will not investigate the matter but will consult the LADO via MASH

Whilst recognising our duty to support staff, the welfare of our pupils remains our paramount consideration. Our school will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the school. We recognise our legal duty to refer to the Disclosure Barring Service (DBS) and any other relevant professional body details of anyone who has harmed or poses a risk of harm to a child. For further details on the management of allegations against staff, please see Bentley Wood High School's Safer Recruitment Policy.

Low level concerns

The school promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately, including low level concerns (Appendix 6).

A low level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside or work and does not meet the harm threshold or is not otherwise serious enough to consider a referral to the LADO. Examples of such behaviour include, but are not limited to: being over friendly with children, having favourites, taking photographs of children on their mobile phone, engaging with a child on a one-to-one basis in a secluded area, or behind a closed door and/or humiliating pupils.

All low level concerns will be shared with the Headteacher so that they are dealt with effectively and to also protect those who work in or on behalf of the school from becoming the subject of potential false low-level concerns or misunderstandings.

Site security/Visitors to the School:

1. **Sign-In:** All visitors must sign in at reception and will receive a lanyard based on their status:
 - a. **Expected Visitors/Parents (without DBS):** White lanyard with red writing.
 - b. **Expected Visitors (with DBS):** Green lanyard.
 - c. **Unexpected Visitors:** Reception will contact the relevant staff member. If unavailable, visitors will be asked to schedule an appointment.
2. **DBS Requirements:** Visitors needing unsupervised access to students must have a valid Enhanced DBS Certificate. If the certificate is over three years old, further checks will be conducted.
3. **Checks by HR:** All visitors will undergo necessary checks by the HR department within paragraphs 281-286 of KCSIE 2024. Police and social workers must present ID, which will be verified by Reception and HR. Any DBS concerns should be referred to the Headteacher, and all checks are documented in the school's Single Central Record.
4. **Supervision:** Visitors without DBS clearance must be accompanied by staff at all times.
5. **Professional Visitors:** Those visiting for professional reasons (e.g., educational psychologists) must show photo ID and either their DBS certificate or a written confirmation from their organization that a proper DBS check has been conducted.
6. **Judgment and Oversight:** The Headteacher will determine access arrangements. All visitors must wear an appropriate lanyard. Visiting speakers must be accompanied by staff, and those known to promote extremist views will not be allowed on school premises.

These measures ensure the safety and well-being of our students while maintaining a secure working environment.

External Organisations using the school's site:

Where services or activities are provided under the direct supervision/management of staff the school arrangements for child protection will apply. Where services or activities are provided separately by another body using the school premises, the Headteacher and School Business Manager will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. All external organisations working on school grounds, will be made aware of the systems we have in regards to safeguarding, and will be expected to follow these systems.

In addition, the School Business Manager will put in place arrangements for the organisation to liaise with the school on safeguarding matters and include safeguarding requirements in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. If this assurance is not achieved, an application to use premises will be refused.

These arrangements apply regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college. The school will follow its safeguarding policies and procedures, including informing the LADO, relating to any incident(s) that happen when an individual or organisation is using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Any individual who is not known or identifiable on site will be challenged for clarification and reassurance.

The school will give careful consideration to the suitability of any external organisations who may provide information, resources & speakers to pupils. The arrangements for the individuals providing these services on the

school's premises may include an assessment of their education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required (e.g. for multiple sessions). The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

Physical Intervention/ Positive Intervention:

The School will comply with the DfE's guidance on use of reasonable force staff may only use reasonable force, meaning no more force than is needed to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment.

The Headteacher, Senior Leaders/teaching and support staff can use such force/restraint as is reasonable in the circumstances to conduct a search for the following prohibited items: knives and weapons, alcohol, illegal drugs, stolen items, cigarettes and tobacco, fireworks, pornographic images, mobile phones or any article that has been or is likely to be used to commit an offence, cause personal injury or damage property.

Where the use of force is necessary, plans and reasonable adjustments should be made for disabled children and children with special educational needs. Any use of force or restraint must be recorded and signed by a witness. The parent/ carer will be informed of the incident.

Appropriate Adults

Appropriate Adults are there 'to safeguard the interests, rights, entitlements and welfare of children and vulnerable people who are suspected of a criminal offence, by ensuring that they are treated in a fair and just manner and are able to participate effectively.' Appropriate Adults are not merely passive observers, they are 'expected to be an active participant. In order to be effective, they need to be assertive and speak

- In KCSIE 2024 it states that:

"[DSL should] ...liaise with the headteacher or principal to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult" See PACE Code C Guidance 2019

When acting as An Appropriate Adult we mindful of our duties to uphold the best interests of a young person at all times, The appropriate adult will "support, advise and assist" the young person, and also "observe whether the police are acting properly and fairly to respect [the young person's] rights and entitlements, and inform an officer of the rank of inspector or above if they consider that they are not".

Online Safety

Our Online Safety Policy is set out in a separate document. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate (see Appendix 8 for filtering and monitoring). Online safety is included in our curriculum at all levels and information is also provided to parents/carers. Before using the internet, school network or IT equipment staff and students sign an Acceptable Use Agreement which is designed to ensure that all adults working in school are aware of their individual responsibilities. The terms of this agreement should be followed at all times (see IT and Virtual school policy)

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

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

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

All Staff are made aware of the school approach to online safety, including:

- Creating a safer online environment – including training requirements, filters and monitoring;
- Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line ([Teaching online safety in schools July, 2019](#));
- Inspiring safe and responsible use and behaviour;
- Acceptable and safe use of mobile phones both within school and on school trips/outings;
- Safe use of camera equipment, including camera phones; and
- What steps to take if you have concerns and where to go for further help.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime

Child on Child Abuse

We, as a school community, have a zero-tolerance approach to abuse (see Appendix 4 and 7). Abuse or harassment should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. Children and young people may not always make a direct report and information may come from overheard conversations or observed behaviour changes.

The School are aware that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.

Different forms Child on Child abuse can take, such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- sexual abuse (which does not necessarily involve violence).
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (referred previously as sexting or youth produced sexual imagery)

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

Bullying - Our school's policy on the prevention and management of bullying is set out in a separate document and is reviewed by the Curriculum and Achievement Committee every 2 years. This policy includes reference to all prejudice related bullying. We acknowledge that to allow or condone bullying may lead to considerations under child protection procedures. We recognise that children can also be vulnerable to physical, sexual and emotional bullying and abuse by their peers or they may be the perpetrator of such behaviour. In addition to cyberbullying, discriminatory bullying and abuse in intimate personal relationships between peers.

We will always address such abuse seriously, involving partner agencies where required. We will remain alert to the possibility that a child or young person who has harmed another may well also be a victim. Staff should not dismiss some abusive sexual behaviour as 'normal' between young people and should not develop high thresholds before taking action.

Sexual Harassment

At Bentley Wood High School, we recognise that sexual violence and sexual harassment can occur between children of **any age and sex** (see Appendix 4 and 7).

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 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. Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of activity but not another. Consent can be withdrawn at any time and each time activity occurs. A child under the age of 13 can never give consent to any sexual activity, the age of consent is 16, sexual intercourse without consent is rape.

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. In referencing sexual harassment, it is 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. Sexual harassment can include: sexual comments, sexual jokes or taunting, physical behaviour, displaying pictures or drawings of a sexual nature, upskirting and online sexual harassment. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. The umbrella term is 'harmful sexual behaviour' (HSB) and it can occur online and/or face-to-face. The school will always consider HSB in a child protection context.

In response to such a report our school will act in accordance with Part 5 of KCSIE (2023):

- reassure the victim that they will be taken seriously, and they will be supported;
- not promise confidentiality as it is very likely that the concern will need to be shared further
- respond in line with our safeguarding procedures outlined in section 5 of this document which have been shared with all staff and students;
- where a concern includes an online element, follow DfE guidance: [Searching, screening and confiscation at school](#) and UKCCIS advice [Sexting in schools and colleges](#). Adults should not view sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery. See [Guidance on Suspected Indecent Imagery for Staff](#).
- if possible, manage any such reports with two members of staff present (preferably the DSL

Where there has been a report of sexual violence, our DSL will make and record an immediate risk and needs assessment.

Where there has been a report of sexual harassment, the DSL will consider the need for a risk assessment on a case-by-case basis. The risk and needs assessment will consider and keep under review:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them

Our DSL will engage with children's social care, the police and specialist services as required. Any risk assessments undertaken by the other agencies/services will be used to inform our school/college's own risk assessment. Important considerations are:

- the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible;
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages and developmental stages of the children involved;
- any power imbalance between the children e.g. age differential, disability or learning difficulty
- if the alleged incident is a one-off or a sustained pattern of abuse;
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- any ongoing risks to the victim, other children, adult students or staff; and
- other related, contextual issues e.g. in the community/local environment
- if both the alleged perpetrator and victim are still attending the same school/college, how best to keep them at a reasonable distance apart (including on transport).

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive (derived from Hackett 2014). It may also be referred to as sexually harmful behaviour or sexualized behaviour. HSB encompasses a range of behaviour, which can be displayed towards younger children, peers, older children or adults. It is harmful to the children and young people who display it, as well as the people it is directed towards. HSB includes:

- Sexist or homophobic name calling and bullying
- Sexual comments in person and on social media directed at students (such as 'slag', 'sket', 'hoe' 'slut')
- Rumours about another student's sexual activity

- Rating students with regard ‘attractiveness’ or ‘masculinity’
- Controlling behaviour in relationships
- Pressure to send sexual photos
- Sexual imagery shared on social media without consent
- Inappropriate or unwanted touching or groping
- Pressure to perform sexual acts
- Sexual bullying, harassment and pressure

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 devices or applications, such as mobile phones, tablets, email, social networking sites and instant messaging services – or ‘youth-produced sexual imagery’. Bentley Wood High School follows The UKCIS [‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’](#) guidance was published in (updated March 2024),

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 Designated Safeguarding Lead immediately upon becoming aware that sexting by a student is likely to have occurred. The allegation will first be investigated by the Designated Safeguarding Lead 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 - in accordance with the 2016. UK Council for Child Internet Safety (UKCCIS now UKCIS) non-statutory guidance on managing incidents of sexting by under-18s.

Teenage relationship abuse

Teenage relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include sexual abuse, physical abuse, financial abuse, emotional abuse or psychological abuse.

Signs include:

- Physical signs injury/illness
- Truancy
- Falling grades
- Isolation from family and friends
- Frequent texts and calls from boyfriend/girlfriend
- Depression
- Self-harm (See Appendix 2)

In response to such a report our school will:

- reassure the victim that they will be taken seriously and they will be supported;
- respond in line with our safeguarding procedures outlined in sections 5 to 7 of this document;
- where a concern includes an online element, follow [Searching, screening and confiscation: advice for schools and UKCCIS Sexting in schools and colleges](#). In general staff will not view or forward illegal images of a child (note that the guidance links in this paragraph give further advice where this is unavoidable); and if possible, manage any such reports with two members of staff present (preferably the DSL being one of them).

- Where there has been a report of sexual violence, our DSL will make and record an immediate risk and needs assessment. Where there has been a report of sexual harassment, including 'upskirting', the DSL will consider the need for a risk assessment on a case-by-case basis.

The risk and needs assessment will consider and keep under review:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them

Our DSL will engage with children's social care, the police and specialist services as required. Any risk assessments undertaken by the other agencies/ services will be used to inform our school's own risk assessment. Important considerations:

- the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible;
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of any harmful sexual behaviour;
- the ages and developmental stages of the children involved;
- any power imbalance between the children e.g. age differential, disability or learning difficulty
- if the alleged incident is a one-off or a sustained pattern of abuse;
- any ongoing risks to the victim, other children, adult students or staff; and
- other related, contextual issues e.g. in the community/ local environment
- if both the alleged perpetrator and victim are still attending the same school/ college, how best to keep them at a reasonable distance apart (including on transport).

Management of sexual violence/ harassment cases

Where appropriate, the management of such cases will be agreed in consultation with children's social care and/ or the police or other specialist service. There are four possible routes – **all** underpinned by the principle that such behaviour is **never acceptable and will not be tolerated**:

- **Manage internally** - In some case of sexual harassment, e.g. one-off incidents, it might be appropriate to handle the incident internally, perhaps through utilising our behaviour and bullying policies and by providing pastoral support.
- **Early Help** – Providing early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.
- **Referrals to children's social care** – Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to children's social care, who will determine whether any of the children involved are in need of protection or other services. Referring to children's social care should not delay our school from taking immediate action to protect the victim and other children. However, we will ensure that any such actions do not jeopardise a statutory investigation.
- **Reporting to the Police** – Any report to the police will generally be in parallel with a
- referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made, the matter should be passed on to the police. If the alleged perpetrator is under ten (below the age of criminal responsibility), the principle of reporting to the police remains. The police will take a welfare approach, rather than a criminal justice approach.

The school will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents/ carers. They should also discuss the best way to protect the victim and their anonymity.

With all routes outlined above, it is vital that all concerns, decisions and reasons for decisions are recorded (written or electronically on CPOMS).

Bail conditions –The term ‘Released Under Investigation’ (RUI) will apply where circumstances do not warrant the application of bail to either re-attend on a particular date or to include conditions preventing activity or in some cases ensuring compliance with an administrative process. In all cases, our school will work with children’s social care and the police to manage any implications and to safeguard children. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

Throughout any criminal process taking place, the police will help and support the school as much as they can – within the constraints of any legal restrictions.

The end of the criminal process – if a child is convicted or cautioned for a sexual offence and remains in school/ college, expectations regarding their future behaviour and any restrictions must be made clear.

Safeguarding and supporting the victim – victims may not disclose the whole picture immediately. They should be asked if they would find it helpful to have a designated trusted adult to talk to about their needs and have choice about who this is. In response to any stress they may experience, flexible or alternative arrangements for their education may need to be considered. We will do everything we reasonably can to protect the victim from bullying and harassment to ensure that they continue to receive a suitable education.

Safeguarding and supporting the alleged perpetrator – Any child will likely experience stress as a result of being subject of allegations and any associated negative reactions by their peers. We will respond proportionately, recognising that the alleged perpetrator may have unmet needs as well as potentially posing a risk of harm to other children. These behaviours may be a symptom of either their own abuse or exposure to abusive practices and or materials. We will seek advice as appropriate from children’s social care, specialist sexual violence services and the police.

If the alleged perpetrator moves to another educational provision, our DSL will ensure that relevant staff at the new provision are made aware of any ongoing support needs and any potential risks to other children and the staff. Sanctions may also be put in place if and when appropriate:

‘Taking disciplinary action and still providing appropriate support are not mutually exclusive. They can, and should, occur at the same time if necessary’ ([Keeping Children Safe in Education September 2024](#))

The school has an effective programme of personal, social, health and economic education PCSHE and Sex and Relationships Education (SRE) to help our students to understand safeguarding issues, how to raise a concern they may have about themselves, or a friend or peer; and learn to recognise and develop healthy and respectful relationships, avoiding stereotypes and promoting equality.

Groups at particular risk include girls, students who identify as LGBT+, or are *perceived* by peers to be LGBT+, and pupils with SEND.

Students are aware of the NSPCC dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance. Report Abuse on 0800 136 663 or email help@nspcc.org.uk.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Contents:

- Appendix 1: types of abuse
- Appendix 2: safer recruitment and DBS checks
- Appendix 3: allegations of abuse made against staff
- Appendix 4: specific safeguarding issues
- Appendix 5: actions where there are concerns about a child
- Appendix 6: low level concerns
- Appendix 7: reporting incidences of alleged sexual violence and harassment
- Appendix 8: filtering and monitoring

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations 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 participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: safer recruitment and DBS checks – policy and procedures Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to

work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
 - Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

** Management positions are most likely to include, but are not limited to, headteachers, principals and Assistant Headteachers*

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider (such as Jubilee Academy), we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who

supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school
-

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options

available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Bentley Wood High Trust.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the

- case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
 - Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
 - **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
 - **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
 - **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
 - Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate
 - Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
 - Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
 - Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for

consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the Headteacher (Naseema Akbar) will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation

- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be

made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to

confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate (Naseema Akbar) with the DSL (Debbie Ferrer).

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

All staff should be aware of indicators of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. Staff should be aware that children can be at risk of harm inside and outside of school, inside and outside of home and online. Staff should exercise **professional curiosity** and know what to look for as this is vital for the early identification of abuse or neglect.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff should consider whether children might be at risk of abuse of exploitation in situations outside their families – harms take a variety of different forms and children can be vulnerable to multiple harms including sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

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

In all cases, if staff are unsure, they should always contact the safeguarding team:

safeguardingteam@bentleywood.harrow.sch.uk or speak to a member of the team/Debbie Ferrer (DSL)

Assessing adult-involved nude and semi-nude sharing incidents

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

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

Sexually motivated incidents

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

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

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

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

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

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

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

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

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

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

They may be contacted by a hacked account of a child or young person

- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation 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 absent, 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 suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur

without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

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

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail

about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

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

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

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

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

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

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

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

Homelessness

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

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

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

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

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

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/carers 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

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmfu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - Negate or destroy the fundamental rights and freedoms of others; or

- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions

- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including Preventing Extremism and Radicalisation Policy, IT Policy, Equality Information and Objectives and Behaviour for Learning Policy.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

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

- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

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

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

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

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

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

Non-collection of children

If a child is not collected at the end of the session/day, at least one or more of the following will be actioned:

- Parents/carers are contacted at home or at work
- If this is unsuccessful, the adults who are authorised by the parents to collect their child from the setting and whose telephone numbers are recorded on the data collection form are contacted
- All reasonable attempts are made to contact the parents or nominated carers
- The Headteacher, Head of Year or DSL (Designated Safeguarding Lead) are informed
- The child does not leave the premises with anyone other than those named on the data collection form
- If no-one collects the child **after one hour** and there is no-one who can be contacted to collect the child, we apply the procedures for uncollected children
- If the child has attended a trip, residential or other out of school activity, the same procedures are applied after **30 minutes**
- We contact our local authority children's social services care team/MASH and the child stays at the setting in the care of **two** members of staff until the child is safely collected either by the parents or by a social care worker
- Social Care will aim to find the parent or relative if they are unable to do so, the child will become looked after by the local authority
- If the child already has an allocated social worker, the school will contact them
- Under no circumstances do staff go to look for the parent, nor do they take the child home with them
- A full written report of the incident is recorded on CPOMS (our online reporting system for safeguarding)

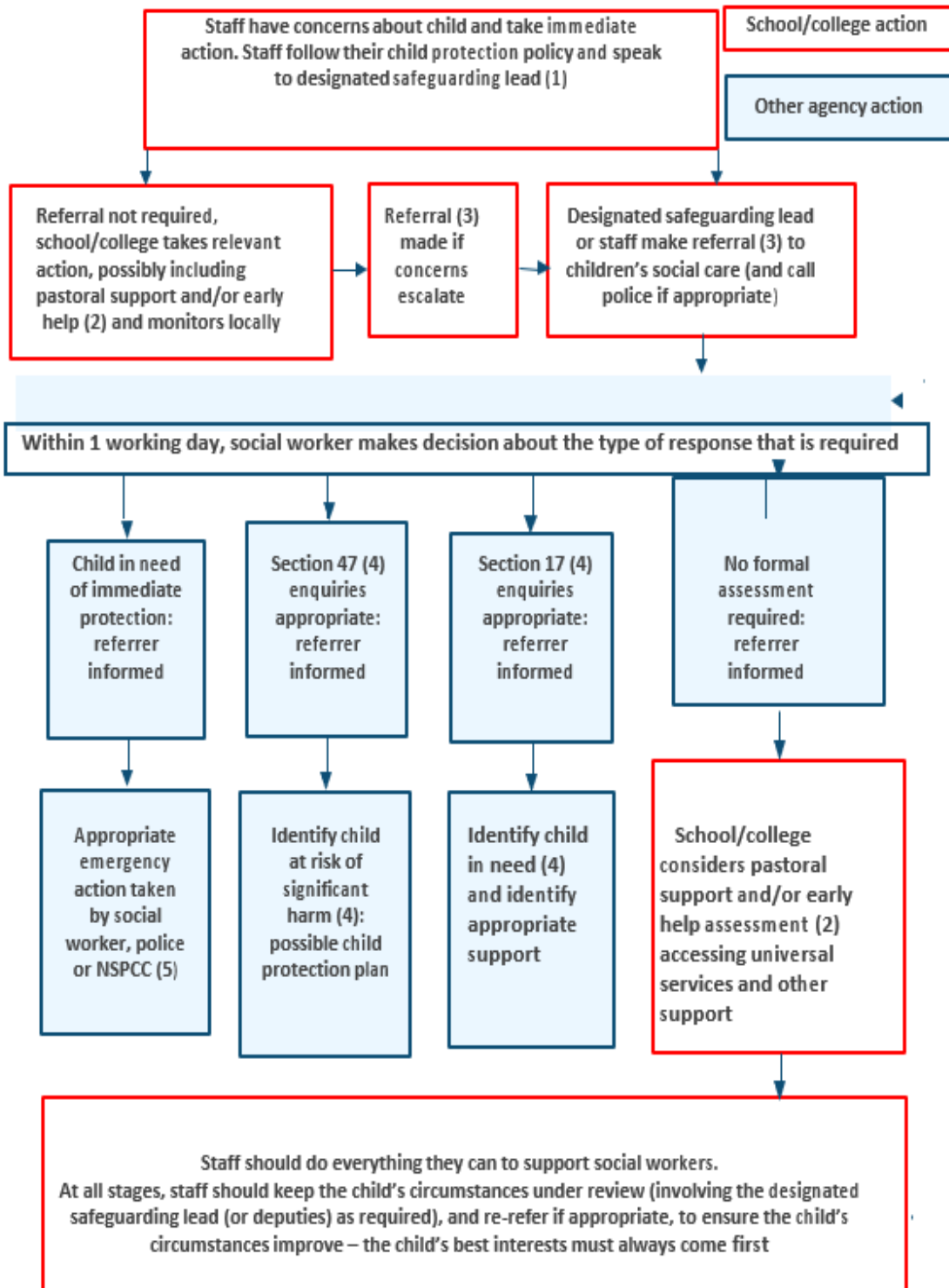
Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing whilst on school premises, we will:

- Senior staff will do a thorough check of the school site.
- Senior staff will contact parent/carer to inform them and request they contact their child via their mobile phone
- If the Child cannot be found either on school site, at the child's home or contactable via mobile phone, the school or parent will contact the police via 101/999.
- The school will also update the Harrow Safer School's Team and make them aware.

Appendix 5:

Actions where there are concerns about a child:



Appendix 6: Low-level concerns

The School strives to embed a culture of openness and transparency in which the School's values and expected behaviour, as set out in the Code of Conduct for Staff, are constantly reinforced by all staff.

All staff should feel enabled to share any concerns about their own or another member of staff's behaviour, with the appropriate member of staff as set out below.

The distinction between an allegation and a low-level concern

The term 'allegation' (in this context) means that it is alleged that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviour that may have happened outside of School that might make an individual unsuitable to work with children)

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the LADO.

A low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

- is not consistent with the Code of Conduct for Staff, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Examples of such behaviour could include, but are not limited to, being over friendly with children, having favourites, taking photographs of children on their personal devices, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, using inappropriate sexualised, intimidating or offensive language etc.

Staff are not expected to determine whether their concern is a low-level concern, serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination will be made by the Headteacher.

How to share low-level concerns

It is important that low-level concerns are shared with the Headteacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of the concern and relevant incident(s).

Concerns can be shared verbally in the first instance, or in writing. The context in which the low-level concern arose and details which are chronological, precise and accurate as possible of the concern and relevant incident(s) must be provided.

Where details of the low-level concern is provided verbally, the Headteacher will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion. The Headteacher will check the accuracy of the record with the member of staff who raised the concern.

Low-level concerns will be treated in confidence as far as possible, but the School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Self-reporting

Staff who find themselves in a situation which could be misinterpreted, might appear compromising to others, have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct for Staff are encouraged to self-report. Self-reporting can be positive for a number of reasons: it is self-protective in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness of the individual's own actions or how they could be perceived; and is an important means of maintaining a culture where all staff aspire to the highest standards of conduct and behaviour.

Recording and reviewing low-level concerns

All low-level concerns will be recorded in writing by the Headteacher. The record will include details of the context in which the concern arose and the action taken. The name of the member of staff sharing the concern will be noted however, where the member of staff wishes to remain anonymous this will be respected as far as possible.

Records will be reviewed at regular intervals to identify potential patterns of concerning, problematic or inappropriate behaviour.

Retention of records

Records will be kept confidential, held securely and in compliance with the Data Protection Act 2018 and UK GDPR.

When the member of staff leaves and/or takes up new employment the records will be reviewed to ensure it still has value either as a safeguarding measure or because of its possible relevance to future claims and is therefore necessary to retain, or whether it can be securely destroyed.

References

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, e.g., misconduct or poor performance. Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. Where a low-level concern has met the threshold for referral to the LADO and found to be substantiated will be included in a reference.

Appendix 7: Reports of Incidences of Sexual Harassment

Reporting incidents of alleged sexual violence and sexual harassment

Context:

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) **and are never acceptable.**

Sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. Schools should be aware of, and respond appropriately to all reports and concerns, including those outside the school, and or online.

We need to be clear that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable, and it will not be tolerated.

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.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school are supported and protected as appropriate.

What is sexual violence?

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. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is sexual harassment?

This list is not exhaustive but could 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;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools) taking and sharing nude photographs of U18s is a criminal offence;
 - sharing of unwanted explicit content;
 - upskirting (is a criminal offence);
 - Sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation; coercion and threats.

Legal responsibilities and equality policies

Schools and colleges are required to comply with relevant requirements as set out in the Equality Act 2010.

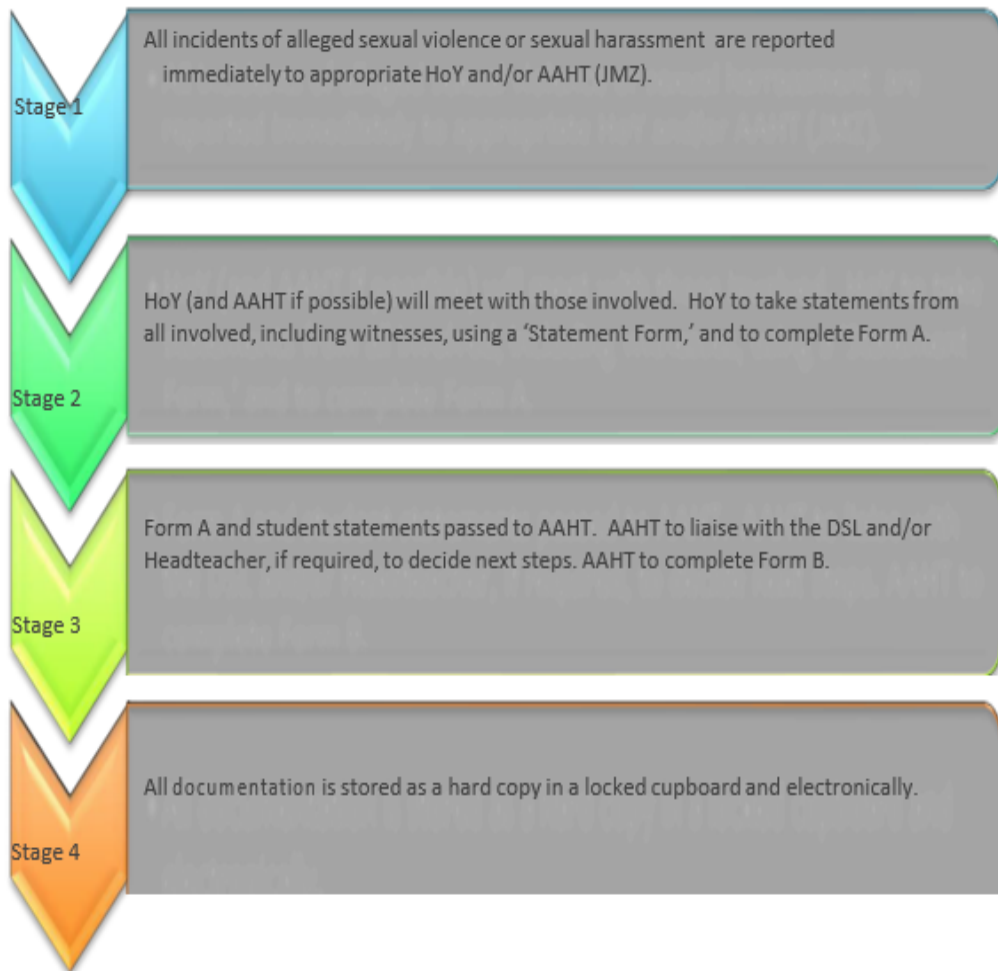
Schools also need to be aware of our obligations under the Human Rights Act 1998. Compliance with the Public Sector Equality Duty (PSED) is a legal requirement. Under the PSED, schools and colleges that are public bodies have a general duty to have regard to the need to eliminate unlawful discrimination, harassment and victimisation, to advance equality of opportunity between different groups and to foster good relations between different groups. The duty applies to all protected characteristics.

Action following a report of sexual violence and/or sexual harassment

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment:

1. Manage internally
2. Early help
3. Referrals to children’s social care
4. Reporting to the police

Reporting process for sexual violence or sexual harassment



Documentation to be completed:

1. Student/ staff statements
2. Form A
3. Form B

Incident of sexual harassment: Form A

To be completed by HoY following discussion with AAHT (JMZ)

Incident reported by		Role in school	
Incident reported to		Role in school	
Date of incident		Date of report	
Nature of incident	Sexual violence	Sexual harassment	

Section 1: Details of those involved in the incident (continue on a separate sheet if necessary)

<u>Victim:</u>	<u>Alleged Perpetrator:</u>	<u>Alleged Perpetrator:</u>
If student at school please complete the following: Year group: Form group:	If student at school please complete the following: Year group: Form group:	If person outside school please provide details:

Section 2: Summary of the incident

Incident of sexual violence or sexual harassment: Form B

To be completed by AAHT following meetings with those involved

Section 1:

Location of incident:

What type of incident occurred? Please highlight.

Sexual violence	Sexual harassment
Rape	Sexual comments
Assault by penetration	Sexual jokes or taunting
Sexual assault	Physical behaviour
Causing someone to engage in sexual activity without consent	Online sexual harassment

Section 2:

Action taken and support offered

To be completed following consultation with the DSL and Head Teacher.

What action(s) was / were taken to deal with the incident? Please highlight.

Warning to the perpetrator
Discussion with the victim's parent(s) / guardian / carer
Discussion with the perpetrator
Discussion with the perpetrator's parent(s) / guardian / carer
Sanction in accordance with the school's behaviour policy
Mediation
Mentoring or Counselling
Early help
Curriculum change or addition
Referral to children's social care
Reporting to the police
Exclusion (internal) and duration
Exclusion (external) and duration
Managed move
Permanent exclusion
Referral to another body
Other (please specify)

Appendix 8: Filtering and monitoring

Aim:

Bentley Wood High School ensures it is a safe place to learn and work online. Filtering and monitoring are both important parts of safeguarding students and staff from potentially harmful and inappropriate online materials. Students and staff are subject to monitoring and filtering to ensure that work devices are used safely and appropriately. This includes the use of Bentley Wood High School's IT devices at home as well as at school. Use of all IT devices used in school on the school network are subject to monitoring and filtering. This will also be active when individuals use Bentley Wood High School's IT devices at home. Ensuring safe and appropriate use at all times. Websites deemed not safe or appropriate will be blocked by our filtering system. This website list will be reviewed and updated regularly. Activity will be monitored and analysed with designated individuals within the safeguarding team alerted to potential instances of concern.

Roles and responsibilities

Governing body

Key contact – Alison Moore

Bentley Wood High School's governing body has overall strategic responsibility for filtering and monitoring.

Our Governing Body will:

- Support the senior leadership team to procure and set up systems which meet required standards of filtering and monitoring.
- Conduct an annual review of the filtering and monitoring systems with the DSL and to ensure the school maintains records of this review for 5 years so that it can inform practice and be made available to those entitled to inspect that information.
- Work closely with the DSL so that incidents are urgently picked up, acted on and outcomes are recorded.
-

Designated safeguarding lead (DSL)

Key contacts – **Debbie Ferrer** (DSL & AHT) **Hary Ilanko** (AHT/Online Safeguarding Lead)

The DSL/Online Safeguarding Lead will:

- Ensure an effective system of filtering and monitoring is in place.

Overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns that emerge from said reports
- checks to filtering and monitoring systems

The senior leadership team including Operations Manager

Key contacts – **Kieran Robinson** (DHT) and **Paola Boyadjian** (OM) The senior leadership team will:

- procuring filtering and monitoring systems
- documenting decisions on what is blocked or allowed and why
- reviewing the effectiveness of your provision
- overseeing reports

The senior leadership team are also responsible for making sure that all staff

- are appropriately trained
- follow policies, processes and procedures
- act on reports and concerns

The IT service provider

Provider: Advanced IT (AIT)

The IT service provider will:

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports
- completing actions following concerns or checks to systems

The IT service provider should work with the senior leadership team and DSL to:

- procure systems
- identify risk
- carry out reviews
- carry out checks

Annual review of filtering and monitoring provision

For filtering and monitoring to be effective it should meet the needs of your students and staff, and reflect your specific use of technology while minimising potential harm.

To understand and evaluate the changing needs and potential risks, Bentley Wood High School will annually review our filtering and monitoring provision. This review will be carried out by the nominated member of the senior leadership team and DSL.

The results of the online safety review will be recorded for reference, kept for 5 years and made available to those entitled to inspect that information.

Technical requirements of annual review

The annual review will include:

- the risk profile of students, including their age range, students with special educational needs and disability (SEND), students with English as an additional language (EAL)
- what Bentley Wood High School's filtering system currently blocks or allows and why
- any outside safeguarding influences, such as county lines
- any relevant safeguarding reports
- the digital resilience of students
- teaching requirements, for example, your RSE and PSHE curriculum
- the specific use of your chosen technologies such as 1:1 device
- what related safeguarding or technology policies Bentley Wood High School has in place
- what checks are currently taking place and how resulting actions are handled

To make your filtering and monitoring provision effective, Bentley Wood High School's review will inform:

- related safeguarding or technology policies and procedures
- roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often and what is checked
- monitoring strategies

The review will be done as a minimum annually, or when:

- a significant safeguarding risk is identified
- there is a change in working practice, like 1:1 devices
- new technology is introduced

Other related fields and criteria included in the annual review

The checks should include a range of:

- school owned devices and services, including those used off site
- geographical areas across the site
- user groups, for example, teachers, students and guests

Bentley Wood High School will keep a log of checks so they can be reviewed. These will include:

- when the checks took place
- who did the check
- what they tested or checked
- resulting actions

Bentley Wood High School will make sure that:

- all staff know how to report and record concerns
- filtering and monitoring systems work on new devices and services before releasing them to staff and students
- blocklists are reviewed and they can be modified in line with changes to safeguarding risks

Useful resources to support annual review of filtering and monitoring

South West Grid for Learning's (SWGfL) [testing tool](#) can be used to check that Bentley Wood High School's filtering system is blocking access to:

- illegal child sexual abuse material
- unlawful terrorist content
- adult content