



Ysgol Bryn Eliau
CHILD PROTECTION &
SAFEGUARDING POLICY

September 2019

Because of their day-to-day contact with individual children during school terms, teachers and other school members of staff are particularly well placed to observe outward signs of abuse, changes in behaviour or failure to develop.'

(Working Together under the Children Act 2004)

Keeping Learners Safe – Welsh Government Circular 158/2015 states:-

'Everyone who works in education should share the same goals to keep children and young people safe'.

We do this by:-

- *creating and keeping safe places to learn*
- *Identifying where there are welfare concerns and taking the right action*
- *Helping children and young people to be aware and understand how to stay safe*

We reach these goals by:-

- *Stopping unsuitable people working with children and young people*
- *Having safer practice in place*
- *Challenging poor or unsafe practice*
- *Identifying when there's an issue or concern about a child's welfare and taking actions*
- *Working together with other services*

Welsh Government safeguard children and young people by making sure they follow requirements of:-

- The Children Act 1989
- The Education Act 2002
- The Children Act 2004
- The Equality Act 2010
- All Wales Child Protection Procedures (2008)
- Social Services & Wellbeing (Wales) Act 2014
- United Nations Convention on the Rights of the Child (UNCRC) 1989 – these include 4 key articles relevant to children and education (Article 12/19/28/29)
- The Rights of Children & Young Persons (Wales) Measure 2011
- 'Prevent Duty Guidance' for England & Wales – on the duty in the Counter Terrorism and Security Act 2015

1. PURPOSE OF A CHILD PROTECTION POLICY

1.1. An effective whole-school child protection policy is one which provides clear direction to members of staff and others about their duties and responsibilities in dealing with child protection issues. An effective policy also makes explicit the school's commitment to the development of good practice and sound procedures. This ensures that child protection concerns and referrals may be handled sensitively, professionally and in ways which support the needs of the child.

2.1. Our school fully recognises the contribution it can make to protect children and support learners in school. There are three main elements to our child protection policy:

a) Prevention (eg positive school atmosphere, teaching and pastoral, support to learners).

b) Protection (by following agreed procedures, ensuring members of staff are trained and supported to respond appropriately and sensitively to child protection concerns).

c) Support (to learners and members of staff and to children who may have been abused).

This policy applies to all learners, members of staff, governors and visitors.

3. SCHOOL COMMITMENT

3.1. We recognise that for our learners, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult can help with the prevention and identification of child abuse. Our school will therefore:

a) Establish and maintain an ethos where learners feel secure and are encouraged to talk, and are listened to.

b) Ensure that learners know that there are adults in the school who they can approach if they are worried or are in difficulty.

c) Include in the curriculum activities and opportunities for PSHE, which equip learners with the skills they need to stay safe from abuse. Further information about these activities and opportunities can be obtained from the school's PSHE coordinator.

d) Include in the curriculum material, which will help learners develop realistic attitudes to the responsibilities of adult life, particularly with regard to child care and parenting skills. Further information about this material can be obtained from the school's PSHE coordinator.

e) Ensure that wherever possible every effort will be made to establish effective working relationships with parents and colleagues from other agencies.

4. FRAMEWORK

4.1. Schools do not operate in isolation. Child protection is the responsibility of all adults and especially those working with children. The development of appropriate procedures and the monitoring of good practice are the responsibilities of the Local Safeguarding Children's Board.

5. ROLES AND RESPONSIBILITIES

5.1. All adults working with or on behalf of children have a responsibility to protect children. There are, however; key people within schools and the Education Services who have specific responsibilities under child protection procedures.

The Headteacher or in his/her absence the deputy headteacher or designated Child Protection Co-ordinator (Designated Senior Person – DSP*1) have this responsibility within schools. It is essential that all members of staff should be made aware of who the nominated Designated Senior Persons are, and be informed that the All Wales Child Protection Procedures is situated in the Headteacher's office. All members of staff should also be in receipt of the small Child Protection Leaflet (2010) which is in the staff handbook. Any queries regarding procedures or referrals should be directed at Safeguarding Co-ordinator for Education. All members of school staff should also be made aware of the Welsh Governments published guidance on – Respect and Resilience; Developing community cohesion – a common understanding for schools and their communities which sets out the role that schools have in developing and supporting strategic approaches to promoting and maintaining community cohesion and eradicating violent extremism (2011). During 2012 the UK Government launched a refocused Prevent Strategy – details of which can be found in the 'Keeping Learners Safe Document' (page 51, & 52).

***1 The Designated Senior Person (DSP) for child protection**

Each school or college should appoint a DSP who has lead responsibility for managing child protection. They don't have to be a teacher but must have the authority to do what they need to do to safeguard learners. The DSP is the main point of contact and source of support, advice and help when a member of staff or anyone has concern for a child. They have the responsibility to decide if a referral needs to be made to keep a child or young person safe. 'Keeping Learners Safe – 2015'

5.2. It is the role of the designated teacher to ensure that local child protection procedures are followed within the school, and to make relevant referrals to the named agencies according to the guidance given. Additionally, it is their role to ensure that all members of staff employed within the school are aware of the school's internal procedures, to advise members of staff and to offer support to those requiring this.

It is the role of the Headteacher to make sure that child protection policies are in place, that there are enough resources and time for the Designated Senior Person, and that all staff and volunteers understand what to do and feel able to raise concerns.

5.3. All boards of governors will have a designated governor for child protection. The roles and responsibilities of the named governor responsible for child protection are to ensure that the school has an effective policy, that child protection procedures are complied with, and to support the school in this aspect. It is important that governors are not given details relating to specific child protection situations to ensure confidentiality is not breached.

Every governing body has a child protection policy and procedures in place that:

- are looked at every year
- available to parents or carers if they ask
- are available in a youth friendly version that learners can understand
- have steps in place to deal with reports against members of staff
- to support new staff.

5.4. The Education Services Child Protection Coordinator provides advice, support, and the training to the school and to the school's named person. They can also make referrals with the Local Safeguarding Children's Board and can raise concerns about procedures on behalf of the school.

6. PROCEDURES

6.1. We will follow the procedures set out in the All Wales Child Protection Procedures and the within the Child Protection Procedures produced for all Education Services in April 2010 in leaflet form.

Adhere to the procedures set out in the Welsh Government circular 002/2013: 'Disciplinary and Dismissal Procedures for School Staff'

Ensure that recruitment and selection procedures are made in accordance with Welsh Government guidance, 'Keeping Learners Safe' Circular 158/2015

Pay due regard to the 'Prevent Duty Guidance' for England & Wales – the duty in the Counter Terrorism and Security Act 2015.

All members of staff are kept informed about child protection procedures, through induction, briefings and awareness training – and members of staff are to be kept informed regularly who the nominated person is and his/her deputy in his/her absence.

There needs to be a face to face interview on induction for new staff, outlining safeguarding procedures and responsibilities, and these interviews should be recorded and filed appropriately.

Other adults visiting the school (e.g. peripatetic teachers, learning support staff) will be advised of the school's policy and the named person to whom they should raise any concerns with.

A statement in the school brochure will inform parents and carers about our school's duties and responsibilities under the All Wales Child Protection Procedures.

We will notify the local social service team if:

- A learner on the child protection register is excluded either for a fixed term or permanently and
- If there is an unexplained absence of a learner on the child protection register of more than two days from the school (or one day following a weekend)
- When a learner on the child protection register leaves, we will transfer information to the new school immediately and inform Child & Family and Safeguarding Services.

7. TRAINING AND SUPPORT

7.1. Our school will ensure that the Headteacher and Designated Senior Officers for Child protection and safeguarding along with the nominated governor for child protection attend training relevant to their role. All members of staff will undertake awareness raising training during their induction into the school and periodically to refresh and update their knowledge and understanding. Support will be available for members of staff from members of the school's management team where there are concerns or queries about child protection. School staff should know their personal responsibilities, and agreed local procedures, be vigilant in identifying cases of abuse, and know how to support a child who discloses abuse.

8. PROFESSIONAL CONFIDENTIALITY

8.1. Confidentiality is an issue, which needs to be discussed and fully understood by all those working with children, particularly in the context of child protection. The only purpose of confidentiality in this respect is to benefit the child. A member of staff must never guarantee confidentiality to a learner nor should they agree with the learner to keep a secret, as where there is a child protection concern this must be reported to the named person and may require further investigation by appropriate authorities. This would lead to a breakdown in trust of adults by the learner and could potentially compromise their wellbeing and safety. The named person will invoke the local agreed guidelines and procedures, where there is a cause for concern. Members of staff will be informed of relevant aspects in respect of child protection on a 'need to know basis' only. Any information shared with a member of staff in this way must be held confidentially to themselves.

9. RECORDS AND MONITORING

9.1. Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concerns held about a child or children within our school, the status of such records and when these records should be passed over to other agencies. A file note will be made of the concern raised and action taken. These file notes are kept in a confidential file, which is separate to other files, in the school's office. In the same way notes must be kept of any learner who is being monitored for child protection reasons.

10. ATTENDANCE AT CHILD PROTECTION CONFERENCES

The headteacher (or Designated Senior Person/s) would attend a child protection conference called in respect of a learner. He/she may be accompanied by other relevant members of staff (e.g. the learner's pastoral teacher) if this is of benefit to the learner. Members of staff attending such conferences will be offered support and access to appropriate counselling if they wish to receive this.

11. SUPPORTING LEARNERS AT RISK

11.1. Our school recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. This school may be the only stable, secure and predictable element in the lives of children at risk. Whilst at school, their behaviour may still be challenging and defiant. It is also recognised that some children who have experienced abuse may in turn abuse others. This requires a considered, sensitive approach in order that the child can receive appropriate help and support.

11.2. This school will endeavour to support learners through:

- a) The curriculum to encourage self-esteem and self-motivation.
- b) The school ethos which promotes a positive, supportive and secure environment and which gives all learners and adults a sense of being respected and valued.
- c) The implementation of school behaviour management policies (required under the Code of Practice, 2002 Education Act – currently under revision).
- d) A consistent approach, which recognises and separates the cause of behaviour from that which the child displays. This is vital to ensure that all children are supported within the school setting.
- e) Regular liaison with other professionals and agencies who support the learners and their families.
- f) A commitment to develop productive, supportive relationships with parents, whenever it is in the child's interests to do so.
- g) The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in child protection situations.

11.3 This policy should be considered alongside other related policies in school. These are the policy for the teaching of PSHE, the policy on sex and relationships education, the policy/guidelines for privacy and dignity of our learners, the policy for management of learners' behaviour, the health and safety policy, alcohol and substance misuse policy, anti-bullying policy, and food & fitness policy/guidelines, and the duty on schools to prevent people from being drawn into terrorism.

11.4 We recognise that, statistically, children with behavioural difficulties and disabilities are most vulnerable to abuse. Members of staff who work, in any capacity, with children with profound and multiple disabilities, sensory impairment and/or emotional and behaviour problems will need to be particularly sensitive to signs of abuse. It must also be stressed that in a home environment where there is domestic violence, drug or alcohol abuse, children may also be vulnerable and in need of support or protection.

Bullying

Our Policy on bullying is set out in our anti-bullying policy and is reviewed annually by the governing body.

Physical Intervention

Our policy on physical intervention is set out in a separate document and is reviewed annually by the governing body.

12. SAFE SCHOOL, SAFE STAFF

Many of our learners would have difficulty in talking about these issues and most lack the vocabulary for this. Members of staff will need to be sensitive to the learners' preferred style of communication and their individual special needs if we are to be able to provide a safe environment for our learners. When engaging with learners all members of staff must be aware of the potential for misinterpreting our learners' efforts to raise a child protection concern or issue.

Members of staff working in a one-to-one situation with a learner should ensure that they are positioned so as to be visible and audible to other members of staff where there may be a possibility of misinterpretation of their interaction with a learner.

Members of staff are informed about counselling and/or giving advice to children/ young people about sexual matters through the school policy on sex and relationships education.

Members of school staff are familiar with the Signs of Abuse (Appendix 1)

Members of school staff are aware of legislation such as the All Wales Protocol for the Management of Young People Engaged in Sexually Harmful Behaviour and the Child Sexual Exploitation Safeguarding Guidance from Welsh Government, and the HM Government – Prevent Duty Guidance: for England & Wales (guidance for specified authorities in England & Wales on the duty in the Counter-Terrorism and Security Act 2015).

Members of staff work hard to maintain effective partnerships with parents and carers, and they should be aware that this policy might affect this working relationship at a given time. However, we will maintain our commitment to working with parents and carers to the benefit of all learners. Sensitive and supportive handling of these issues, whilst affirming that the learners in our care are our first priority, will help maintain this working relationship.

All members of staff are required to complete a Disclosure and Barring Service (DBS) check, which has replaced the Police Records search, prior to taking up their appointment, and to sign a declaration regarding convictions relating to the harm of children during their application process. Members of staff who deliberately seek to mislead the school in respect of this will be subject to dismissal.

Where a member of staff is subject to an accusation of abuse, this will be fully investigated under the school's disciplinary procedures and All Wales Child Protection Procedures Part 4. Advice should also be sought from a Senior Officer in Education Services and Conwy's Education Designated Safeguarding Lead. Any suspected or alleged abuse must be reported to Children & Family & Safeguarding Service or the Police.

Policy recommended and endorsed by:-

Named Designated Senior Persons for the School –

Mr Dave Humphreys - Headteacher
Mr Craig Stewart – Assistant Headteacher
Mrs Bronwen McKibben
Dr Anna McCormack-Colbert

Safeguarding Co-Ordinator for Education Services –
Mrs Sian Pineau

Nominated CP Governor for the School -
Mrs Sue Colman

APPENDIX 1

Signs of Abuse

These definitions and indicators are not meant to be definitive, but only serve as a guide to assist you. It is important too, to remember that many children may exhibit some of these indicators at some time, and that the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviour such as a death or the birth of a new baby in the family or relationship problems between parents/carers. In assessing whether indicators are related to abuse or not, Social Services will always want to understand them in relation to the child's development and context.

Children in Need

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child either directly by inflicting harm, or indirectly, by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them; or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

There are four types of child abuse. They are defined in the All Wales Child Protection Procedures and Welsh Government guidance *Safeguarding Children: Working Together Under the Children Act 2004* as follows:

Physical abuse

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

The physical signs of abuse may include:

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises- in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- broken bones
- scalds, with upward splash marks
- multiple burns with a clearly demarcated edge.

N.B. Most children will collect cuts and bruises as part of the rough-and-tumble of daily life. Injuries should always be interpreted in light of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks.

Changes in behaviour that can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example in hot weather
- depression or withdrawn behaviour
- running away from home.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Changes in behaviour which can indicate emotional abuse include:

- neurotic behaviour e.g. sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- sudden speech disorders
- self-harm
- fear of parent being approached regarding their behaviour
- developmental delay in terms of emotional progress

Sexual Abuse

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

The physical signs of sexual abuse may include:

- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains discomfort when walking or sitting down
- Pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- sexual knowledge which is beyond their age, or developmental level
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts

- saying they have secrets they cannot tell anyone about
- substance or drug abuse
- suddenly having unexplained sources of money not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults

Neglect

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. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The physical signs of neglect may include:

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

Changes in behaviour which can also indicate neglect may include:

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

These definitions and indicators are not meant to be definitive, but only serve as a guide to assist you. It is important too, to remember that many children may exhibit some of these indicators at some time, and that the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviour such as a death or the birth of a new baby in the family or relationship problems between parents/carers. In assessing whether indicators are related to abuse or not, Social Services will always want to understand them in relation to the child's development and context.

Appendix 2

How the school will respond to youth-produced sexual imagery

Ysgol Bryn Elian works with Social Services and North Wales Police in terms of dealing with any issues of sexual exploitation, including imagery. The school follows 'All Wales Child Protection Procedures' and 'Keeping Learners Safe' but will also follow the guidance provided in 'Sexting: Responding to Incidents and Safeguarding Learners. Guidance for Educational Settings in Wales' produced by the UK Council for Child Internet Safety which is also used by the AWSLCP (All Wales School Liaison Core Programme) from North Wales Police. The guidance document will be followed. Key areas include:

Defining Youth Produced Sexual Imagery

Whilst practitioners refer to the issue as 'sexting' there is no clear definition of what 'sexting' is. Many practitioners consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' The AWSLCP uses the following definition "Posting online or sending sexual messages or naked or semi-naked photos or video clips via any digital device". Yet when young people are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know'. Similarly, many parents think of sexting as flirty or sexual text messages rather than images.

This advice only covers the sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management.

On this basis, this advice introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting.' This is to ensure clarity about the issues this advice addresses:

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
- 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

The types of incidents which this advice covers are:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

This advice does not cover:

- The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and schools should always inform the police.
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery.

Why has this advice been produced?

Sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives.

Photos and videos can be shared as text messages, email, posted on social media or increasingly via mobile messaging apps, such as Snapchat, WhatsApp or Facebook Messenger.

This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing sexual images of under-18s is also illegal.

Although the production of such imagery will likely take place outside school, these issues often manifest in schools, colleges and educational settings.

Schools, colleges and other educational settings need to be able to respond swiftly and confidently to ensure that children and young people are safeguarded, supported and educated.

Annex F offers a flowchart for responding to incidents.

These procedures should be part of a school's safeguarding arrangements and all incidents of youth produced sexual imagery should be dealt with as a safeguarding matter.

The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be protecting and safeguarding the welfare of the children and young people involved.

Criminalisation of children

The law criminalising the taking, possessing or sharing of indecent images of children was created long before mass adoption of the internet, mobiles and digital photography. It was also created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children.

Despite this, young people who take, possess or share sexual imagery of themselves, or peers, are breaking the law.

We should not, however, unnecessarily criminalise children. Children with a criminal record face stigma and discrimination in accessing education, training, employment, travel and housing and these obstacles can follow a child into adulthood.

Whilst young people creating and sharing sexual imagery may be putting themselves and others at risk, it is often the result of young people's natural curiosity about sex and their exploration of relationships. Often, young people need education, support and safeguarding, not criminalisation.

The National Police Chiefs Council (NPCC) has made clear that incidents involving youth produced sexual imagery should primarily be treated as a safeguarding issue.

Schools, colleges and other educational settings may respond to incidents without involving the police.

The school will use Section 2 of the Guidance for Educational Settings in Wales to ensure that thorough and appropriate investigation is carried out.

Crime recording

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

However, there have been concerns that young people could be negatively affected should that crime be disclosed, for example, on an enhanced Disclosure and Barring Service (DBS) check.

To mitigate this risk, the NPCC has worked with the Home Office and the Disclosure and Barring Service and provided policing with a new way of recording the outcome of an investigation into youth produced sexual imagery. This is called Outcome 21.

Outcome 21

Every 'crime' recorded on police systems has to be assigned an outcome from a predefined list of outcome codes. As of January 2016 the Home Office launched a new outcome code (Outcome 21) to help formalise the discretion available to the police when handling crimes such as youth produced sexual imagery.

Initial response

Keeping Learners Safe statutory guidance sets out that everyone in the education service should create and maintain a safe learning environment and identify where there are child welfare concerns and take action to address them, where appropriate, in partnership with other agencies. All schools and colleges must have a child protection policy, and might wish to consider how they reflect their approach to youth produced sexual imagery in that policy.

All incidents involving youth produced sexual imagery should be responded to in line with the school's safeguarding and child protection policy.

When an incident involving youth produced sexual imagery comes to a school's attention:

- the incident should be referred to the Designated Senior Person for child protection (DSP) as soon as possible.
- the DSP should hold an initial review meeting with appropriate school staff.
- the DSP may wish to seek general advice from their School Community Police Officer.
- there should be subsequent interviews with the young people involved (if appropriate).
- parents or carers should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- at any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to social services and/or the police immediately in line with the school's usual arrangement.

Disclosure

Disclosures about youth produced sexual imagery can happen in a variety of ways.

The young person affected may inform a class teacher, the DSP in the school, or any member of the school staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or college, or inform the police directly.

Initial review meeting

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

- whether there is an immediate risk to a young person or young people.
- if a referral should be made to the police and/or social services.
- images should not be viewed, unless in a circumstance where it is absolutely necessary to safeguard the young person. Please refer to the section on searching devices, viewing and deleting imagery.
- what further information is required to decide on the best response.

- whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- whether immediate action should be taken to delete or remove images from devices or online services. Please refer to Section 2 Viewing and deleting imagery.
- any relevant facts about the young people involved which would influence risk assessment
- if there is a need to contact another school, college, setting or individual.
- whether to contact parents or carers of the pupils involved - in most cases they should be involved.

An immediate referral to police and/or social services should be made if at this initial stage:

1. the incident involves an adult.
2. there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs).
3. what you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
4. the imagery involves sexual acts and any child in the imagery is under 13.
5. you have reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

If none of the above apply, then a school may decide to respond to the incident without involving the police or social services (a school can choose to escalate the incident at any time if further information/concerns come to light).

The School Community Police Officer is always available to provide further general advice if required at any stage.

The decision to respond to the incident without involving the police or social services would be made in cases when the DSP is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and, if appropriate, their local network of support.

The decision should be made by the DSP in consultation with the Headteacher.

The decision should be recorded in line with the school or college policy.

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

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

Assessing the risks

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

- When assessing the risks the following should be considered:
- why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
- are there any adults involved in the sharing of the imagery?
- do the young people involved have additional vulnerabilities?
- does the young person understand consent?

- has the young person taken part in this kind of activity before?

Annex F

Flowchart for responding to incidents

