

## Academy Policy

# Safeguarding and Child Protection Policy

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## Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Raleigh Education Trust	Sean Kelly – Chief Executive Officer	0115 855 0100
Academy	<p>Academy Principal: Lee Morgan</p> <p>Senior DSL: Dan Siddons</p> <p>Deputy DSL: Ki Addis</p> <p>Deputy DSL: Tom Endy</p> <p>DSL Team: Gareth Westray</p> <p>Designated teacher for looked after children: Ki Addis</p>	0115 915 5858
Raleigh Education Trust Safeguarding Lead	Elizabeth Browne	0115 9151271
Local authority designated officer (LADO)	<p>0115 876 2302</p> <p>LADO@nottinghamcity.gov.uk</p>	
Board of Trustees Chairperson	Eileen Hartley	0115 855 0100

Safeguarding Trustee	For contact, speak to Claire Beardsall	0115 8550100 Claire.beardsall@raleightrust.org
Safeguarding Governor	Geetika Goyal – Westbury	0115 8550100
Channel helpline Nottingham City Social Care Local authority school education co-ordinator	020 7340 7264 0115 876 4800 or email: <a href="mailto:candfdirect@nottinghamcity.gov.uk">candfdirect@nottinghamcity.gov.uk</a>  0115 8764749    Claire.Maclean@nottinghamcity.gov.uk	

## Context

Westbury Academy is a special school within the Raleigh Education Trust providing education for pupils with social emotional mental health needs. Pupils at Westbury Academy are admitted to the school following completion of an Education Health Care Plan (EHCP) or an EHCP is in process with the agreement that the placement at the Academy is appropriate for their current needs.

The majority of pupils at Westbury Academy receive their education on-site, however, a small minority of our pupils are educated offsite to meet need. As part of their enhanced provision, a range of education providers are sourced. Westbury Academy will only arrange placement for pupils at registered schools, independent schools and Nottingham City Council-approved alternative provisions. All offsite education providers have an up-to-date child protection and safeguarding policy, have a named DSL and have their safeguarding procedures quality assured by a member of Raleigh Education Trust quality assurance team.

Where it is mentioned throughout this policy that staff will speak/contact a DSL, this must be considered in the context of how the Academy works with offsite education providers. For example, for our directly employed staff, their DSL to contact will be the named Westbury Academy DSL, but for offsite education provider staff, this will be their named DSL for their offsite education provider. It is then the responsibility of the offsite education provider DSL to notify our DSL at the Academy of any safeguarding concerns. This expectation has been made clear to all offsite education provider DSLs. Most off-site education providers (DSLs) share our safeguarding electronic reporting system for our DSL to be alerted to safeguarding concerns promptly, agreed actions are then taken to address the concern. Where electronic communication is not possible, concerns are reported via telephone or email between DSLs.

## 1. Aims

- 1.1. Our Academy is committed to safeguarding and promoting the welfare of children and young people and we expect all staff and volunteers to share this commitment. Creating a culture of safety and vigilance for our pupils is of paramount importance, we aim to:
- (a) create and maintain a safe environment.
  - (b) manage situations should child welfare concerns arise.
  - (c) create an atmosphere of trust in which pupils feel confident to confide in any concern.
  - (d) help young people to understand the difference between acceptable and non - acceptable behaviour.
  - (e) teach pupils to stay safe from harm.
- 1.2. Pupils are taught about safeguarding, including E-safety as part of a broad and balanced curriculum. All staff within the academy take welfare concerns seriously and encourage children and young people to talk about anything that worries them.

## 2. Legislation and statutory guidance

2.1 This policy is based on the Department for Education's statutory guidance

[Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/659302/Keeping-children-safe-in-education-2023.pdf) and

[Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#).

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

2.2 This policy is also based on the following legislation:

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

- (e) [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- (f) Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated' activity is in relation to children.
- (g) [Statutory guidance on the Prevent duty](#), which explains schools' duties under the CounterTerrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- (h) The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children.
- (i) [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- (j) [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and principal should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- (k) [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

2.4 This policy also complies with the Nottingham City Safeguarding Children Partnership:

- (a) <https://www.nottinghamcity.gov.uk/information-for-residents/childrenandhttps://www.nottinghamcity.gov.uk/information-for-residents/children-andfamilies/nottingham-city-safeguarding-children-board/families/nottingham-citysafeguarding-children-board/>

### 3. Definitions

3.1 **Safeguarding and promoting the welfare of children** means:

- (a) Protecting children from maltreatment

- (b) Preventing impairment of children’s mental and physical health or development
- (c) Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- (d) Taking action to enable all children to have the best outcomes.

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

3.3 **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

3.4 **Neglect** is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 1 defines neglect in more detail.

3.5 **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

3.6 **Children** include everyone under the age of 18.

3.7 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:

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

3.8. Designated Safeguarding Lead (DSL) – this term is referred to throughout the policy and refers to either Deputy DSL in the absence of the DSL

## 4. Equality Statement

4.1. Some children have an increased risk of abuse, both online and offline and additional barriers can exist for some children with respect to recognising or disclosing concerns. We are committed to



anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

4.2. We give special consideration to children who:

- (a) Have special educational needs (SEN) or disabilities (see section 10)
- (b) Are young carers.
- (c) May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- (d) Have English as an additional language.
- (e) Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- (f) Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation. (g) Are asylum seekers.
- (h) Are at risk due to either their own or a family member's mental health needs.
- (i) Are looked after or previously looked after (see section 15)
- (j) Are missing or absent from education for prolonged periods and/or repeat occasions
- (k) Whose parent/carers has expressed an intention to remove them from school to be home educated. Local authorities will review the plan and work closely with parents/carers.

## 5. Roles and responsibilities

5.1 Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding Partners.

Our 3 partners are:

- (a) The local authority (LA) children's safeguarding board and children's social care.
- (b) A clinical commissioning group for an area within the LA (Health).
- (c) The chief officer of police for a police area in the LA area

Our policy and procedures also apply to extended school and off-site activities.

5.2 The school plays a crucial role in preventative education. This is in the context of a wholeschool approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism,

misogyny/misandry, homophobia, transphobia, biphobia and sexual violence/harassment. Policy and procedures are also underpinned by the Law regarding consent, inappropriate touching and sexual contact. Sessions delivered by the police liaison officer in partnership with the academy are used to enhance the curriculum. This will be reinforced by our:

- (a) Relationships & Positive Behaviour Policy
- (b) Pastoral support
- (c) PSHE/RSE curriculum, which is delivered regularly through the JIGSAW Scheme of Learning, tackles issues such as:
  - i. healthy and respectful relationships
  - ii. boundaries and consent
  - iii. stereotyping, prejudice and equality
  - iv. body confidence and self-esteem
  - v. how to recognise an abusive relationship (including coercive and controlling behaviour)
  - vi. the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
  - vii. what constitutes sexual harassment and sexual violence and why they're always unacceptable

5.3 All issues are delivered at an age and stage-appropriate level for the pupils in each group. Where specific incidents occur, these will be woven into the planning for the specific groups and may be covered through assemblies or intervention with the Police Liaison Officer.

#### **5.4. All staff**

5.5. All staff will:

- a) read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- b) Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- c) Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).
- d) Provide a safe space for pupils who are LGBT to speak out and share their concerns. All staff work closely to build relationships with pupils and opportunities to discuss any concerns are

given regularly. This includes tutor time and quiet reading sessions. There is also access to counselling support, if necessary.

- e) Further information can be found in the Trust Equality and Diversity Policy.

5.5. All staff will be aware of:

- (a) Systems and procedures that support safeguarding, including this policy, the trust's Relationships and positive behaviour policy, the academy's behaviour guidance and each online safety policy (which includes the expectations, applicable roles and responsibilities in relation to what they will be supported and kept safe.
- (b) The fact that children can be at risk of harm inside and outside of their home, at school and online.
- (c) The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.
- (d) What to look for to identify children who need help or protection

**5.6. The Designated Safeguarding Lead (DSL)**

5.7. The DSL is a member of the senior leadership team and takes lead responsibility for child protection and wider safeguarding. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. The academy uses Smoothwall as a filter. Alerts are sent to leaders to monitor school devices and school networks. This is broken down into tiers of alerts that includes instant response and weekly reporting for the DSL to respond accordingly. Leaders will provide an overview of filtering and monitoring processes to governance.

5.8. Please see 'Important contacts' (page 1) for each academy's Safeguarding Team.

5.9. If for any reason a DSL cannot be contacted, staff must contact an academy senior leader or the Trust Safeguarding Lead.

5.10. The DSL (senior/deputy) will be given the time, funding, training, resources and support to:

- (a) Be the first point of contact for staff concerning child welfare and child protection matters.
- (b) Be aware of pupils who have a social worker.
- (c) Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues with teachers and school leadership staff.
- (d) Provide advice and support to other staff on child welfare and child protection matters, including delivering staff annual training and termly updates.
- (e) Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- (f) Contribute to the assessment of children.
- (g) Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- (h) Complete safeguarding induction e.g. agency staff, including obtaining safer recruitment information for the SCR, if appropriate.

- (i) Record, monitor and track all referrals.
- (j) Carry out regular quality assurance on all records and referrals (Dip Test) carried out by lead DSL regularly. SG lead is invited to safeguarding meetings, to offer support and advice.
- (k) Ensure that child protection information is transferred to the pupil's new school. Where possible, CPOMS records are transferred electronically within 5 days of pupils starting a new school. Where paper records are transferred, these are sent using recorded delivery and a 'Transfer of Records' form is completed as evidence of the transfer. This is completed within 5 working days of the transfer of the pupil to the new school.
- (l) Ensuring risk assessments put in place for pupils are recorded on our safeguarding electronic system. Risk assessments used include, but are not limited to, 'bladed article' and 'sexualised behaviour'. Risk assessments for behaviour, injuries and medical conditions will also be used as appropriate.
- (m) Have a good understanding of harmful sexual behaviour through annual online and face to face training.
- (n) Have a good understanding of the filtering and monitoring systems and processes in place at our school
- (o) To liaise with the Trust safeguarding Lead as necessary for support, advice and supervision.

#### 5.8 The DSL will also

- (a) Keep the Principal (if they are not the DSL) informed of any issues. Meetings take place weekly involving the Principal, DSL and Trust Safeguarding Lead/ Minutes are recorded and stored on the school server in a protected folder.
- (b) Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- (c) Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to support the development of academy and trust policies, by attending multi-agency network meetings. The police school liaison officer is involved where appropriate and offers support in terms of contextual safeguarding. Our Academy police liaison officer is available in Westbury Academy ½ a day per week - [Pc932 Paul Kanikowski](#).
- (d) Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- (e) Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search – PACE Code C2029. School policy on search and confiscation is delivered as part of yearly safeguarding updates at the start of each year. Registers of staff who attended this training are kept. Any policy changes are notified to all staff.
- (f) Seek advice/guidance from the Trust Safeguarding Lead.

#### 5.11 Local Governor Board (named in 'important contacts')

5.12. All Governors have an enhanced DBS which is recorded on the single central record (SCR) and 128 management checks are carried out and recorded. The Chair of Trustees has an enhanced DBS which is countersigned by the Secretary of State.

5.13. Governors have a key responsibility for monitoring safeguarding and child protection across the Academy. Governor meetings are held termly which includes a safeguarding update. Governors receive the termly Principal's report and annual safeguarding audit. Our Raleigh Education Trust safeguarding lead delivers safeguarding updates to governors at termly meetings along with audit actions.

5.14. Responsibilities include:

- (a) To ensure a child protection /safeguarding policy is in place.
- (b) To ensure procedures are in place for dealing with allegations against a member of staff not just within the Academy setting but also staff's conduct outside the Academy setting which is known as the 'harm' test. This is concerning a person's conduct outside the school and need not include a child, for example, domestic abuse of a partner.
- (c) To ensure appropriate staff training is in place including online safety training and that it is updated regularly and is in line with advice from the safeguarding partners.
- (d) Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training. Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
- (e) To ensure there is a member of the LGB who is responsible for and has been trained for safeguarding, child protection and safer recruitment.
- (f) To ensure policies and procedures in the academy are reviewed annually, or earlier where necessary. This is done in conjunction with the annual safeguarding audit which is reported in the Principal's Report. The Trust safeguarding lead provides reports to the trust safeguarding trustee.

5.15. They will also make sure:

- (a) The DSL has the appropriate status and authority to carry out its job effectively.
- (b) The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- (c) Online safety is a running and interrelated theme within the whole-academy approach to safeguarding and related policies. Concerns are reported via the safeguarding system which are managed without delay by the DSL team. Appropriate and proportionate actions will be taken such as speaking to the child and contacting parents/carers, police or other agencies. An appropriate risk assessment may be put in place.

- (d) Senior Leaders and the DSL are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
- (e) The academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Referred to the 15.6 referral flow chart.
- (f) That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- (g) Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - i. Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, inspect them if needed
  - ii. Make sure there are arrangements for the body to liaise with the academy about safeguarding arrangements, where appropriate
  - iii. Make sure that safeguarding requirements are a condition of using the academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply

5.16 Safeguarding governor will undertake the following specific training:

- (a) Online TES -Governance of Safeguarding.
- (b) The Prevent.
- (c) Confederation of school Trusts, Strategic safeguarding for schools.

### **5.17. Trust Safeguarding Lead: Elizabeth Browne**

5.18 The Trust Safeguarding Lead will offer support and challenge, concerning all safeguarding matters. Through half-termly quality assurance, they will ensure all processes and procedures operate to a high standard across all the academies within the Trust. They will update academy principals half termly in support of the Head teacher's report to the local governing body.

The Trust Safeguarding Lead is responsible for:

- (a) To support and advise on a safeguarding training programme in partnership with the academies.
- (b) To work collaboratively with colleagues offering support and guidance.

- (c) To ensure the Safeguarding policy is updated in line with guidance and statutory policies.
- (d) To quality assure all records and referrals to external agencies.
- (e) To ensure annual safeguarding audits are completed and shared with the appropriate stakeholders, including the Safeguarding Trustee.
- (f) To support the Academy Principals with allegations against staff and attending any relevant meetings.
- (g) To chair the Trust Safeguarding Network meeting.
- (h) To ensure all relevant safeguarding updates and best practices are shared within the Trust via the Safeguarding Network Meetings.
- (i) To be aware of any pupils who are at a critical stage of their CP plan.
- (j) To provide advice to stakeholders concerning welfare, safeguarding and child protection issues.
- (k) To meet with the Safeguarding Trustee annually.
- (l) To provide regular updates to the Central Executive team.
- (m) To oversee the Single Central Record across the academy sites.
- (n) To work alongside the Trust Data Protection Officer with regards to Subject Access Requests with a safeguarding nature.

## 5.19 The Principal

5.20. The Principal is responsible for the implementation of this policy, including:

- (a) Ensuring that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction.
- (b) Communicating this policy to parent/carers when their child joins the school and via the school website.
- (c) Ensuring that the DSL has appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent.
- (d) Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly. This must include online safety training and ensure staff have clear understanding of the filtering and monitoring arrangements across the academy.
- (e) Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

## 5.21 Virtual school heads

- 5.22. Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

## 6. Confidentiality

- 6.1 Please see the Trust's Data Protection Policy.
- 6.2 Personal information about all pupils' families is regarded by those who work in this academy as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality:
- (a) Staff understand that they need to know only enough to prepare them to act with sensitivity to a pupil and to refer concerns appropriately. The DSLs and Principals will disclose information about a pupil to other members of staff on a need-to-know basis only. It is inappropriate to provide all staff with detailed information about the pupil, incidents, the family and the consequent actions.
  - (b) All academy staff operate within the information-sharing advice document July 2018 'Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many Serious Case Reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.'  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

## 7. Recognising abuse and taking action

- 7.1 Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.
- 7.2 Please note – in this and subsequent sections, you should take any references to the DSL to mean "the Senior/Deputy DSL or Safeguarding Team."

## 8. If a child is suffering or likely to suffer harm, or in immediate danger

- 8.1 Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral.
- 8.2 Tell the DSL as soon as possible if you make a referral directly.
- Children and Families Direct:  
Email: [candfdirect@nottinghamcity.gov.uk](mailto:candfdirect@nottinghamcity.gov.uk)



Tel: 0115 8764800

GOV.UK webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

## 9. If a child makes a disclosure to you

School staff receive TES annual Child Protection Refresher training which covers how to manage a disclosure.

9.1 If a child discloses a safeguarding issue to you, you should:

- (a) Believe what the pupil is communicating to you. Allow them time to talk freely and do not ask leading questions.
- (b) Stay calm and do not show that you are shocked or upset.
- (c) Do not make personal comments e.g. if a pupil asks “what do you think?” (d) Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- (e) Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- (f) Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it.
- (g) Write-up and submit via the electronic safeguarding system (by the end of the day), alerting the DSL/Principal (**STAFF MUST NOTIFY THE DSL/PRINCIPAL IN PERSON OF ANY CONCERNS WHERE A CHILD MAY BE AT RISK IF THEY WERE TO GO HOME**). Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so.

## 10. If you discover that FGM has taken place or a pupil is at risk of FGM

- 10.1 The Department for Education’s 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”.
- 10.2 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’.
- 10.3 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.
- 10.4 **Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally (with support from the DSL). This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

- 10.5 Unless they have been specifically told not to disclose, involve children's social care as appropriate.
- 10.6 **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, **immediately**.
- 10.7 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.
- 10.8 **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL, **immediately** and follow our local safeguarding procedures.

## **11. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

- 11.1 Figure 1 on page 20 illustrates the procedure to follow if you have any concerns about a child's welfare.
- 11.2 Where possible, speak to the DSL first or the deputy DSL in their absence to agree on a course of action.
- 11.3 If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the 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.
- 11.4 Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL or deputy DSL as soon as possible or a senior leader.
- 11.5 The Academy uses CPOMS to report and record all safeguarding matters, including all direct referrals to children's social care.

## **12. Early help**

- 12.1 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.
- 12.2 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.
- 12.3 Procedures for early help may include:

- (a) School counsellor – weekly sessions on site
- (b) Behaviour Therapist - weekly sessions on site
- (c) Referral to CAMHS (Child and Adolescent Mental Health Services)
- (d) Referral to BEMHS (Behaviour and Mental Health Services)
- (e) MARF referral (multi-agency referral form) (DSL will make this referral)
- (f) Whole Life disability team referral - pupils who have an EHCP
- (g) Schools Early Intervention Officer (SEIO)
- (h) Educational Psychologist
- (i) School nursing service

12.4 Please see the academy's DSL for more information

## 13. Referral

- 13.1 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.
- 13.2 If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.
- 13.3 The local authority will decide 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.
- 13.4 If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.
- 13.5 For information on escalation procedures please refer to the Trust Safeguarding Lead (Elizabeth Browne), who will provide the appropriate support and advice: Email: [elizabeth.browne@raleightrust.org](mailto:elizabeth.browne@raleightrust.org)

## 14. The PREVENT Strategy

- 14.1 Westbury Academy recognises that it has a duty under Section 26 of the CounterTerrorism Act, 2015, in the exercise of its functions, to have due regard to the need to prevent people from being drawn into terrorism.

Prevent Officer – Dan Siddons

The Prevent officer for the local authority is Louise Cox

[Louise.cox@nottinghamcity.gov.uk](mailto:Louise.cox@nottinghamcity.gov.uk) Tel: 0115 8765864 The Prevent officer for the East Midlands is Mark Pollock:  
<https://www.counterterrorism.police.uk/east-midlands/>

14.2. The PREVENT Strategy aims respond to the ideological challenge of terrorism and the threat we face from those who promote it.

14.3 The academy's PREVENT risk assessment arrangements:

- (a) Academy Prevent Risk Assessment is completed annually. Any risk ratings of 3 or 4 are reported to the Principal.
- (b) Annual Prevent Risk Assessment shared with Senior Leadership Team
- (c) Any risk ratings of 3 or 4 require plans to be added to the Risk Assessment to mitigate or lower these risks

14.4. Working in partnership, including [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The academy is aware of and manages the risks for pupils of being drawn into terrorism. Where necessary, referrals are made based on concerns raised in school. An individual will be required to give consent before any support through the Channel programme is provided.

14.5. Staff complete yearly PREVENT training at the start of the academic year.

14.5 Supporting children:

- (a) Internet filtering is provided throughout the school site and is monitored by the safeguarding team.
- (b) Fundamental British Values curriculum (FBV) – this is covered through the use of Jigsaw as a curriculum for the delivery of PSHE as well as assemblies throughout the year.

14.6 The academy works with families to support them as appropriate and to signpost to further support where necessary.

14.7 The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism concerning a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergencies.

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

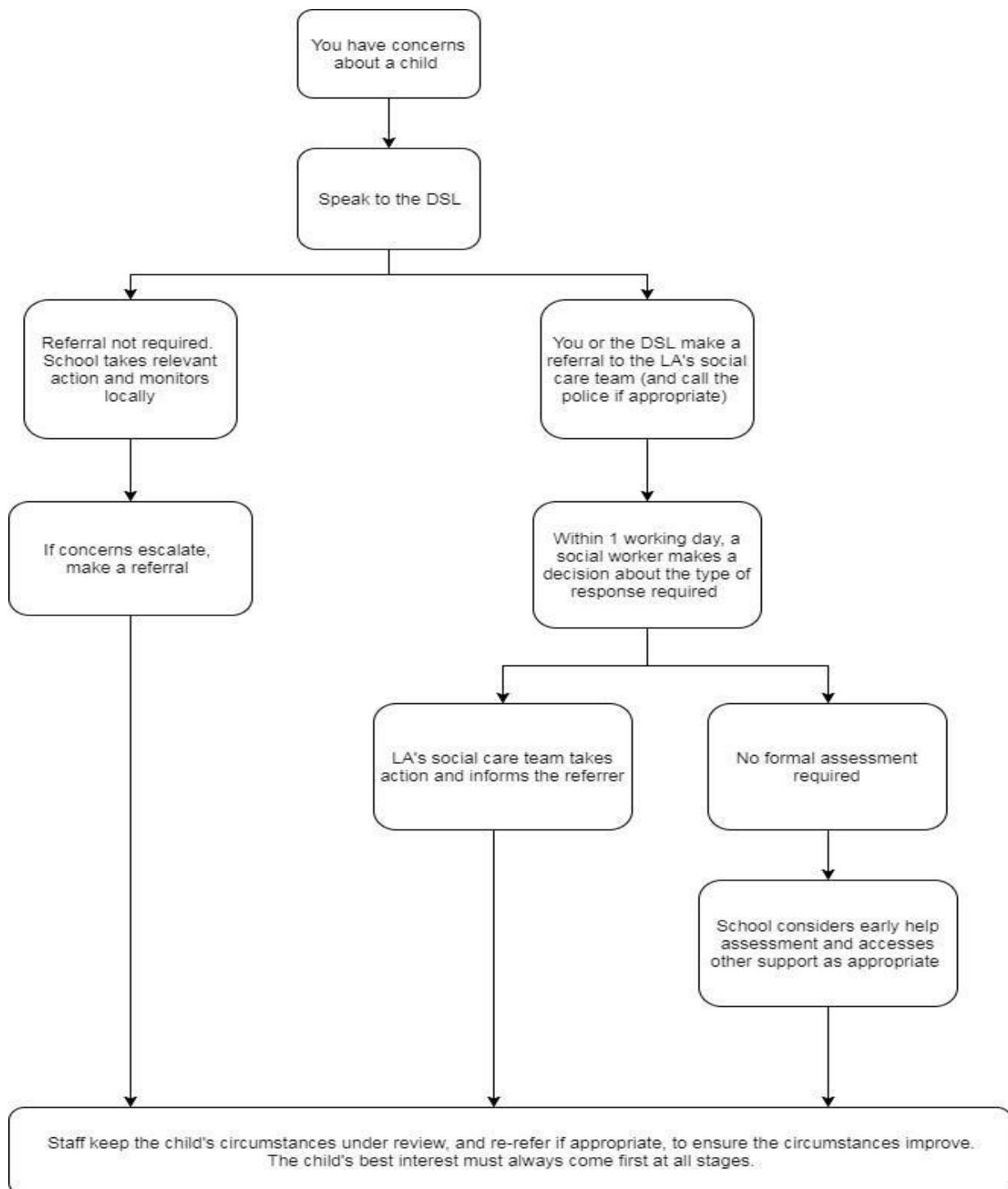
- (a) Think someone is in immediate danger
- (b) Think someone may be planning to travel to join an extremist group
- (c) See or hear something that may be terrorist-related

## 15. If you have a mental health concern about a child

- 15.1 Staff member assigned to Mental Health First Aid Training – Gareth Westray (training to be undertaken in 2023)
- 15.2. Strategies available to support pupils include:
- (a) Sensory Rooms
  - (b) Calming Rooms
  - (c) Wellbeing Hub
  - (d) Withdrawal Rooms
  - (e) School Counsellor
  - (f) Pupil Journey Profile
  - (g) Emotional Literacy Support Assistant
  - (h) EHC Plans and Reviews
- 15.3 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.
- 15.4 Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- 15.5 If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.4.
- 15.6 If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree on a course of action.
- 15.7 Poor attendance to school can be an indicator of mental health problems in children.

## 15.8 Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action-refer to Deputy DSL)



## **16. Concerns about a staff member, supply teacher or volunteer**

- 16.1 If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the Academy Principal. The Academy Principal will make contact with the Trust safeguarding Lead. If the concerns/allegations are about the Principal, speak to the Trust's CEO (Sean Kelly) if the concerns/allegations are about the CEO, speak to the chair of the Board of Trustees. Contact details can be obtained through the Trust governance professional [Claire.Beardsall@raleightrust.org](mailto:Claire.Beardsall@raleightrust.org)
- 16.2 This applies to all cases where it is alleged that a staff member, supply teacher or volunteer has:
- (a) behaved in a way that has harmed a child, or may have harmed a child
  - (b) possibly committed a criminal offence against or related to a child
  - (c) behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
  - (d) behaved or may have behaved in a way that indicates they may not be suitable to work with children
- 16.3 Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the head teacher, report it directly to the local authority designated officer (LADO).
- 16.4 If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

## **17. Non-recent allegations**

- 17.1 Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

## **18. Low-level concerns**

- 18.1 In line with Section Two of Part Four of Keeping Children Safe in Education, we recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately. The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored and reinforced by staff.

## 18.2 Definition of low-level concerns:

18.3 The term 'low-level' concern does not mean that the concern is insignificant, it means that the threshold set out at the start of 8.7 has not been met. A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the academy/trust may have acted in a way that:

- (a) 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 LADO.
- (b) examples of such behaviour could include, but are not limited to:
  - i. being over-friendly with children
  - ii. having favourites
  - iii. taking photographs of children on a personal mobile phone
  - iv. engaging with a child on a one-to-one basis in a secluded area or behind a closed door
  - v. using inappropriate sexualised, intimidating or offensive language. *Such behaviour can exist on a spectrum.*

## 18.4 Sharing low-level concerns

18.5 Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Principal and or DSL. Any concerns about the Principal should be reported to the Trust Chief Executive Officer- Sean Kelly

## 18.6 Recording low-level concerns

18.7 All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which the concern arose, and action is taken, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation. Records will be 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 by referring to the LADO, where a pattern of behaviour moves from a concern to meeting the harms threshold.

## 18.8 Low-level concerns and references

18.9 Low-level concerns will not be included in references unless they relate to issues that would normally be included in a reference, for example, misconduct or poor performance. Where a low-level concern has met the threshold for referral to the LADO and is found to be substantiated, it



will be referred to in a reference. Low-level concerns will be reviewed by the Academy Principal and DSL termly. If patterns are found in reviews, appropriate action will be taken.

## 19. Allegations of abuse made against other pupils

19.1 We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

19.2 We also recognise the gendered nature of child-on-child abuse (previously known as peer-on-peer abuse). However, all child-on-child abuse is unacceptable and will be taken seriously through our referral processes and curriculum that helps pupils understand what is and what is not ok.

19.3 Most cases of pupils hurting other pupils will be dealt with under the Trust’s Relationships & Positive Behaviour Policy and/or the individual academy’s behaviour guidance, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. Child-on-child abuse is most likely to include, but may not be limited to:

- (a) Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- (b) Abuse in intimate personal relationships between peers
- (c) Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element that facilitates, threatens and/or encourages physical abuse)
- (d) Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element that facilitates, threatens and/or encourages sexual violence)
- (e) Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- (f) 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
- (g) Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth-produced sexual imagery)
- (h) Upskirting, which typically involves taking a picture under a person’s clothing without their permission, to view their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- (i) 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).
- (j) Use of drugs or alcohol, where a pupil is forced/coerced to participate in

19.4 If a pupil makes an allegation of abuse against another pupil:

- (a) You must record the allegation (under the ‘child-on-child abuse’ category) and tell the DSL, but do not investigate it

- (b) The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- (c) The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- (d) The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

19.5 For further information refer to the Trust Relationships & Positive Behaviour Policy, the academy's Behaviour guidance (and Anti-Bullying policy).

19.6 We will minimise the risk of child-on-child abuse by:

- a) Challenging any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- b) Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- c) Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- d) Ensuring pupils can easily and confidently report abuse using our reporting systems
- e) Ensuring staff reassure victims that they are being taken seriously
- f) Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- g) Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- h) Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- i) Ensuring staff are trained to understand:
  - j) How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - i. That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
    - ii. That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
      - Children can show signs or act in ways they hope adults will notice and react to

- A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong
- iii. That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - iv. That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - v. The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - vii. That they should speak to the DSL if they have any concerns
  - viii. That social media is likely to play a role in the fall-out from any incident or alleged incident, including potential contact between the victim, alleged perpetrator(s) and friends from either side

## 20. Sharing of nudes and semi-nudes ('Sexting')

### 20.1 Your responsibilities when responding to an incident

- 20.2 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youthproduced sexual imagery'), you must report it to the DSL immediately.
- 20.3 The DSL will report incidents of this nature to the police in the first instance to establish whether a criminal offence has taken place. The DSL will ensure the police are aware of any referrals made to social care.

### 20.3 You must **not**:

- (a) View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- (b) Delete the imagery or ask the pupil to delete it
- (c) Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- (d) Share information about the incident with other members of staff, pupil(s), or parents/carers that are not directly involved with the pupil.
- (e) Say or do anything to blame or shame any young people involved

20.4 You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

## 20.5 Initial review meeting

20.6 Following a report of an incident, the DSL/Principal will organise an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- (a) Whether there is an immediate risk to pupil(s)
- (b) If a referral needs to be made to the police and/or children's social care
- (c) If it is necessary to view the image(s) to safeguard the young person (in most cases, images or videos should not be viewed)
- (d) What further information is required to decide on the best response
- (e) Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- (f) Whether immediate action should be taken to delete or remove images or videos from devices or online services
- (g) Any relevant facts about the pupils involved which would influence risk assessment
- (h) If there is a need to contact another school, college, setting or individual
- (i) Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- (j) The DSL will make an immediate referral to police and/or children's social care if:
- (k) The incident involves an adult
- (l) 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)
- (m) What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
- (n) The imagery involves sexual acts and any pupil in the images or videos is under 13

- (o) The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

20.7 If none of the above applies then the DSL, in consultation with the principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

## **20.8 Further review by the DSL**

20.9 If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

20.10 They will hold interviews with the pupils involved (if appropriate).

20.11 If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

## **20.12 Informing parent/carers**

20.13 The DSL will inform parent/carers at an early stage and keep them involved in the process unless there is a good reason to believe that involving them would put the pupil at risk of harm.

## **20.14 Referring to the police**

20.15 If it is necessary to refer an incident to the police, this will be done via calling 101.

## **20.16 Recording incidents**

20.17 All sexting incidents and the decisions made in responding to them will be recorded via our electronic safeguarding system.

## **20.18 Curriculum Coverage**

20.19 Pupils are taught about the issues surrounding sexting as part of our PSHE and/or computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- (a) What it is

- (b) How it is most likely to be encountered
- (c) The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- (d) Issues of legality
- (e) The risk of damage to people's feelings and reputation
- (f) Pupils also learn the strategies and skills needed to manage
- (g) Specific requests or pressure to provide (or forward) such images
- (h) The receipt of such images. The majority of this coverage is through the PSHE (Jigsaw) curriculum and this is tailored to the needs of individual cohorts. Due to the nature of pupils with SEN, the content is adjusted to meet specific needs, while ensuring age/stage-appropriate coverage.

20.20 This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## **20.21 Notifying parent/carer(s)**

20.22 Where appropriate, we will discuss any concerns about a child with the child's parent/carers. The DSL will normally do this in the event of suspicion or disclosure.

20.23 Other staff will only talk to parent/carers about any such concerns following consultation with the DSL.

20.24 If we believe that notifying the parent/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

20.25 In the case of allegations of abuse made against other children, we will normally notify the parent/carers of all the children involved.

## **20.26 Reporting systems for our pupils**

20.27 Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

20.28 We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

20.29 To achieve this, we will:

- (a) Put systems in place for pupils to confidently report abuse
- (b) Ensure our reporting systems are well-promoted, easily understood and easily accessible for pupils
- (c) Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

20.30 Pupils will be made aware of their academy's reporting systems through discussions during registration/tutor time, PSHE/RSE lessons, assemblies and information boards etc. Display boards are updated as information changes as well as being reviewed termly. Display boards and curriculum plans are reviewed as part of the annual safeguarding audit. Further information can be found on the academy and trust websites and through leaflets found in the reception.

## **21. Pupils with special educational needs and disabilities**

21.1 We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges, and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- (a) Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- (b) Pupils being more prone to peer group isolation than other pupils
- (c) The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- (d) Communication barriers and difficulties in overcoming these barriers

21.22 We offer extra pastoral support for these pupils. This includes:

- (a) Dedicated tutor time to start and end the day
- (b) Initial meetings with parents/carers to start the year
- (c) A primary model is used in the preparation phase before a secondary model is used in the progression phase
- (d) High staff: pupil ratios
- (e) Dedicated wellbeing hub

- (f) Weekly phone call home
- (g) Personal education and attendance plans
- (h) Trauma-informed approach

## 22. Children missing from education

- 22.1 We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parent /carers when pupils are not at school. This means we need to have at least two contact numbers for parent /carers. Parent/carers should remember to update the school as soon as possible if the numbers.
- 22.2 If there is a concern a child may be missing from education (CME), the academy's DSL will follow Nottingham City protocols and procedures for reporting CME. The Trust attendance team work in conjunction with the academy to follow up on all instances of non-attendance. Weekly safeguarding & attendance meetings take place between the principal, DSL and the attendance team.

## 23. Together we can stop child sexual abuse

- 23.1 No child should be a victim of sexual abuse (please see appendix 1) and the Academy is committed to preventing children from becoming/being victims of sexual abuse. If staff have any concerns, they must report these to the DSL immediately or/and contact the NSPCC on:

**Tel: 0800 800 5000**

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

For further information please visit the 'Stop abuse together campaign' website

<https://stopabusetogether.campaign.gov.uk/>

## 24. Contextual Safeguarding

- 24.1 Contextual safeguarding for the academy is far-reaching as the pupils enter the academy from a wide range of areas across the East Midlands. Key factors to consider are County Lines, knife crime and Child Criminal Exploitation.
- 24.2 Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. **All** staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so schools must provide as much information as possible as part of the referral process.



This will allow any assessment to consider all the available evidence and the full context of any abuse. Regular dip testing of our safeguarding electronic system enables us to see what is trending within Westbury Academy. Support is put in place via staff training so all staff are well-equipped to deal with these concerns. Extra support through our well-being hub is being put in place. Our police liaison officer will also contribute to working with our pupils to address these concerns.

## **25. Pupils with a social worker**

- 25.1 Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- 25.2 The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- 25.3 Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:
  - (a) Responding to unauthorised absence or missing education where there are known safeguarding risks
  - (b) The provision of pastoral and/or academic support

## **26. Looked after children and previously looked after children (known in Nottingham as Children in care)**

- 26.1 Designated Teacher for Children in Care: Ki Addis
- 26.2 We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
  - (a) Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
  - (b) The DSL has details of children's social workers and relevant virtual school heads.
- 2.63 Our academy has an appointed designated teacher (please see 'Important contacts'), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children (children in care - Nottingham) in line with statutory guidance.
- 2.64 The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

2.65 As part of their role, the designated teacher will:

- (a) Work closely with the DSL to ensure that any safeguarding concerns regarding Children looked after and previously children in care are quickly and effectively responded to. Minutes from weekly safeguarding meetings are shared with the designated teacher with any actions highlighted for completion. PEP and LAC meetings are attended across the safeguarding team and minutes from these are added to CPOMS. Where no member of staff is available to attend a meeting, a report will be submitted in advance of the meeting.
- (b) Work with virtual school heads to promote the educational achievement of looked after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

## 27. Online Safety and the use of mobile technology

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

27.2 To address this, our school aims to:

- (a) Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- (b) Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- (c) Set clear guidelines for the use of mobile phones for the whole school community
- (d) Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- (e) Receive regular website filter alerts from IT support and act accordingly. Our IT support service is Flywheel IT Services: [helpdesk@flywheel-it.co.uk](mailto:helpdesk@flywheel-it.co.uk). Tel: 01905788023.

### 27.3 The 4 key categories of risk

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

- (a) **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, Antisemitism, radicalisation and extremism

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

#### 27.5 To meet our aims and address the risks above we will

- (a) Educate pupils about online safety as part of our curriculum (including, but not limited to Jigsaw/PSHE/RSE). For example:
  - i The safe use of social media, the internet and technology
  - ii Keeping personal information private
  - iii How to recognise unacceptable behaviour online
  - iv How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- (b) Ensure staff complete relevant training as part of their induction on safe internet use and online safety issues, including cyberbullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- (c) Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- (d) Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- (e) Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. Smoothwall (see Appendix 7) is used for robust filtering and send alerts to key staff in the academy to respond accordingly. The reporting system will have an instant response when required as well as weekly reporting. The DSL will receive an overview of all concerns raised directly and through CPOMS.
- (f) DSL to carry out an annual review of our approach to online safety, that considers and reflects the risks faced by our school community.
- (g) Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly. For further information please refer to the academy's Online Safety/E-Learning Policy.

## 28. Mobile phones and cameras

- 28.1 Pupil mobile phones are handed in upon arrival to school and are returned to pupils when they leave to go home. If a pupil refuses to hand in their phone, they will not be allowed to lessons and will be kept separate from other pupils.
- 28.2 Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- 28.3 We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

## 29. Complaints and concerns about school

- 29.1 Complaints against staff
- 29.2 Complaints against staff that are likely to require a child protection investigation will be handled following our procedures for dealing with allegations of abuse made against staff (section 8.7). Also, please refer to the Trust's complaints policy.

## 30. Whistle-blowing

- 30.1 Please see Trust's Whistle-blowing policy. <https://www.raleightrust.org/wp-content/uploads/sites/2/2021/03/WhistleblowingPolicyhttps://www.raleightrust.org/wp-content/uploads/sites/2/2021/03/Whistleblowing-Policy-December-2020.pdfDecember-2020.pdf>
- 30.2 NSPCC Whistle-blowing helpline: 0800 0280285

## 31. Record-keeping

- 31.1 We will hold records in line with our records retention schedule.
- 31.2 All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded via the electronic safeguarding system (CPOMS). If you are in any doubt about whether to record something, discuss it with the DSL.
- 31.3 Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- 31.4 Safeguarding records relating to individual children will be retained in line with KCSIE 2022 and the Trust's retention schedule.
- 31.5 If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. Also, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

## 32. Training

### 32.1 All staff

32.2 All staff members will undertake safeguarding and child protection procedures training at induction, including whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. New staff will receive safeguarding training within the first half term should any existing training received be old or out of date. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners. The training must include an understanding of the expectations for online safety, roles and responsibilities around filtering and monitoring.

32.3 All staff will complete the Trust's mandatory safeguarding e-learning modules scheduled throughout the academic year. Safeguarding training will be tracked via the academy's MIS.

32.4 All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. This training will be refreshed annually via the Home Office online course.

32.5 Staff will also receive regular safeguarding and child protection updates including online safety (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

32.6 Volunteers will receive appropriate training, if applicable.

32.7 All staff are to receive annual and ongoing contextualised safeguarding training, which includes:

- (a) Safeguarding issues specific to the academy
- (b) Safeguarding issues specific to the demographic of the pupils at the academy
- (c) Updates/changes to policy
- (d) Refresher training on recording concerns
- (e) Contextual safeguarding relating to Nottingham LA requirements

32.8 All staff are aware a child may not be ready to disclose concerns. Staff should maintain professional curiosity and report to the DSL.

### 32.9 The Designated Safeguarding Lead (DSL) and deputy DSL(s)

32.10 The DSL will undertake child protection and safeguarding training at least every 2 years.

32.11 In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through Nottingham city DSL termly networks, ebulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

32.12 They will also undertake Prevent awareness training annually.

32.13 The DSLs will be supported by the Trust Safeguarding Lead and the Safeguarding Network.

### **32.14 Board of Trustees/ Governors**

32.15 All trustees/governors receive safeguarding training at induction which is updated annually. This is to make sure that they:

- (a) Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- (b) Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

32.15 As the chair of trustee/governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the principal/headteacher, they receive training in managing allegations for this purpose.

### **32.15 Recruitment – interview panels**

32.16 Please refer to the Trust's Safer Recruitment policy.

<https://www.raleightrust.org/compliance/policies/>

## **33. Staff who have contact with pupils and families**

33.1 All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

33.2 At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

## **34. Restrictive Positive Intervention**

34.1 Restraint may be necessary to safeguard the individual and/or others from serious injury or harm, and sometimes it will be the only realistic option, for example, to prevent a child from running into a busy road.

- 34.2 We aim to promote a positive and proactive approach to behaviour, including deescalation techniques appropriate to the child or young person, to minimise the likelihood of or avoid the need to use restraint.
- 34.3 The use of restraint is based on an assessment of risk and to safeguard the individual or others.
- 34.4 Restraint should only be used where it is necessary to prevent the risk of serious harm, including injury to the child or young person.
- 34.5 For further details please read the Trust Relationships & Positive Behaviour, and Restrictive Physical Intervention policies.

## 35. Screening and searching process

- 35.1 Please refer to the [Trust Relationships & Positive Behaviour Policy](#)

## 36. Monitoring arrangements

- 36.1 This policy will be reviewed **annually**. At every review, it will be approved by the full governing board.

## 37. Links with other policies

- 37.1 This policy links to the following policies and procedures:

- a. Relationships & Positive Behaviour Policy, and the academy's behaviour guidance
- b. Anti-bullying
- c. Restrictive Positive Intervention
- d. Staff Code of Conduct (also known as staff behaviour policy)
- e. Whistle-blowing
- f. Complaints
- g. Health and Safety
- h. Attendance
- i. Online safety/E-learning
- j. Equality
- k. Sex and relationship education
- l. First aid
- m. Curriculum
- n. Safer Recruitment
- o. GDPR, Data protection
- p. Disciplinary
- q. SEND

## Appendix

1. These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education & working together to safeguard children.

### Appendix 1: Types of abuse

2. **Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.
3. **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.
4. **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.
5. Emotional abuse may involve:
  - (a) Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
  - (b) Not giving the child opportunities to express their views, deliberately silencing them or 'making fun of what they say or how they communicate
  - (c) Age or developmentally inappropriate expectations are being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction
  - (d) Seeing or hearing the ill-treatment of another
  - (e) Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
6. **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:
  - (a) 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



- (b) 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)
7. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
  8. **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.
  9. Once a child is born, neglect may involve a parent or carer failing to:
    - (a) Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
    - (b) Protect a child from physical and emotional harm or danger
    - (c) Ensure adequate supervision (including the use of inadequate caregivers)
    - (d) Ensure access to appropriate medical care or treatment
  10. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
  11. **Up skirting**
  12. "The Voyeurism (Offences) Act, which is commonly known as the Up skirting Act, came into force on 12 April 2019. 'Up skirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim." (Keeping Children Safe in Education Sept 2020).
  13. **Fabricated-induced illness**
  14. Fabricated or induced illness (FII) is a form of child abuse. It occurs when a parent or carer, usually the child's biological mother exaggerates or deliberately causes symptoms of illness in the child. FII is also known as Munchausen's syndrome by proxy. FII is a child protection issue and cannot be treated by the NHS alone. Therefore, if staff suspect FII they must follow their Academies safeguarding procedures by reporting concerns through the safeguarding electronic system and informing the DSL immediately, the DSL will refer the concerns to the Children and Families direct (Social Care). If you suspect that someone you know may be fabricating or inducing illness in their child it is not recommended that you confront them directly. A direct confrontation is unlikely to make a person admit to wrong doing and it may allow them to dispose of any evidence of abuse.

## Appendix 2: Specific Safeguarding Issues

1. Some children and young people may be particularly vulnerable to abuse and harm. The designated safeguarding lead should be aware of the range of guidance that is available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local (Safeguarding Partnership) procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm. It must be noted some of the text are directly taken from Keeping Children Safe in Education 2022.
2. **Child Sexual Exploitation**
3. The statutory definition of Child Sexual Exploitation
4. Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
5. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.' (Department for Education, 2012).
6. Child sexual exploitation is a form of abuse that involves children (male and female, of different ethnic origins and different ages) receiving something in exchange for sexual activity. Schools are well placed to prevent, identify and respond to children at risk of sexual exploitation.
7. **Who is at risk?**
8. Child sexual exploitation can happen to any young person from any background. Although the research suggests that females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.
9. The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed

choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people.

10. In all its forms, CSE is child abuse and should be treated as a child safeguarding issue.
11. **Child Criminal Exploitation (CCE)**
12. CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.
13. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.
14. Some of the following can be indicators of CCE:
  - (a) children who appear with unexplained gifts or new possessions.
  - (b) children who associate with other young people involved in exploitation.
  - (c) children who suffer from changes in emotional well-being.
  - (d) children who misuse drugs and alcohol.
  - (e) children who go missing for periods or regularly come home late.
  - (f) children who regularly miss school or education or do not take part in education.
15. **County Lines**
16. Criminal exploitation of children (CEC) is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.
17. When children are not attending school, the risk that they could be exploited either criminally and/or sexually is heightened. In line with the Local Authority procedures, a CME (child missing in education) referral will be made in line with the timescales set out in the Attendance and Punctuality Policy. When the child returns to school, teachers and staff must be aware of the signs and symptoms of trauma and refer any concerns swiftly. DSLs can seek support in the case of exploitation by completing a Children at Risk of Exploitation Toolkit and contacting the Exploitation Coordinator; [rachael.osborne@nottinghamcity.gov.uk](mailto:rachael.osborne@nottinghamcity.gov.uk)
18. **Modern Slavery and the National Referral Mechanism**

19. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/993172/Modern\\_Slavery\\_Statutory\\_Guidance\\_EW\\_NonStatutory\\_Guidance\\_SNI\\_v2.3.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/993172/Modern_Slavery_Statutory_Guidance_EW_NonStatutory_Guidance_SNI_v2.3.pdf)

20. **Honour-Based Abuse including Forced Marriage**

21. Honour Based Abuse is a cultural, not a religious phenomenon. It impacts a range of communities. The challenges for services include developing responses that keep people safe and hold perpetrators to account without stereotyping, stigmatising or making assumptions about any given individual or community.
22. Honour Based Abuse, which may include forced marriage and/or female genital mutilation, is perpetrated against children and young people for several reasons. These include:
- a. Protecting family 'honour' or 'Izzat'
  - b. To control unwanted behaviour and sexuality (including perceived promiscuity or being lesbian, gay, bisexual or transgender)
  - c. As a response to family, community or peer group pressure
  - d. Strengthening family links
  - e. Protecting perceived cultural and/or religious ideals (misguided or dated)
  - f. Retaining wealth, property or land within the family
  - g. Preventing unsuitable relationships
  - h. Assisting claims for residence and citizenship in the UK
  - i. Perceived immoral behaviour Inappropriate make-up or dress
  - j. Possession and/or use of a mobile telephone
  - k. Kissing or showing other forms of intimacy in public
  - l. Rejecting a forced marriage
  - m. Being a victim of rape or other serious sexual assault
  - n. Inter-faith relationships (o) Seeking a divorce.

23. **Forced Marriage**

24. 'A forced marriage is a marriage in which one or both spouses do not (or, in the case of children and some adults at risk, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.'

25. Scottish Government  
“A marriage conducted without the valid consent of both parties where duress is a factor.” A Choice by Right (June 2000)
26. Forced Marriage (Civil Protection) Act 2007 (England/Wales)
- (a) Courts have the power to make Forced Marriage Protection Orders.
  - (b) Breach of an injunction would not itself be a criminal offence but would be a contempt of court. Courts would have the full range of sanctions available to them, including imprisonment.
  - (c) Enables third parties to apply for an injunction on behalf of somebody
27. There will be a maximum penalty of seven years for committing a forced marriage offence and a maximum penalty of five years for breach of a forced marriage protection order.
28. Staff must report concerns regarding forced marriage to the DSL immediately to ensure safeguarding procedures can be implemented, the DSL will inform the Academy Principal, Children and Families social care and the police.
29. **Private Fostering**
30. A private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.
31. A close family relative is defined as a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.
32. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before A private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.
33. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not doing so is a criminal offence.
34. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect or be involved in trafficking, child sexual exploitation or modern-day slavery.

- 35. Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools must inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.
- 36. School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself must inform the local authority of the private fostering arrangements.
- 37. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

38. **Preventing Radicalisation**

- 39. Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counterterrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all academies.
- 40. Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk and that staff are appropriately trained to look out for signs of radicalisation and are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programmes to challenge extremist ideology. The guidance on this has not yet been published but we will be sharing this as soon as possible as well as keeping you informed on how we are coordinating this in a partnership approach.
- 41. In the meantime, if you have any concerns about individuals who may be being drawn into support for extremist ideology, please contact the Prevent Team [prevent@nottinghamshire.pnn.police.uk](mailto:prevent@nottinghamshire.pnn.police.uk). Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.
- 42. To minimise the risk, staff will lookout for early signs of radicalisation/extremism, such as pupils;
  - (a) showing sympathy for extremist causes
  - (b) glorifying or advocating violence, especially to other faiths or cultures
  - (c) intolerance of difference, including faith, culture, gender, race or sexuality

43. **Incels Community**

- 44. Definition of Incels:
- 45. A member of a sprawling online community. Incels are men who describe themselves as “involuntary celibates”.

“They see women as completely commodified and dehumanised sex objects [that] are there purely for male sexual pleasure. And they blame women for the fact that they’re not having sex.” (Guardian, 2021)

46. Possible indicators of Incels involvement could include:
  - a. include derogatory comments/writings/drawings about women
  - b. social isolation/exclusion and general signs of radicalization
47. If staff have any concerns about a student being involved with the incel community or sharing incel ideology, they must report this immediately to the DSL/safeguarding team.
48. **Child-on-child abuse**
49. Our Academy promotes positive relationships between peers, and encourages children who feel uncomfortable, threatened or at risk, to speak out. Westbury Academy has a zero-tolerance approach to child-on-child abuse.
50. Allegations are managed by senior staff who deal with each matter on a case-by-case basis and investigate thoroughly with the children involved, making appropriate referrals to outside agencies where appropriate (such as police or social care). Incidents are recorded using the electronic safeguarding system as appropriate and risk assessments are undertaken.
51. Westbury ensures that parents and carers are aware of disclosures or allegations of abuse and aim to work together towards a resolution securing ways in which to move forward. We will support the victim, perpetrator and/or the family/carers involved in an incident of child-on-child abuse and take into account the context of the concern.
52. Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.
53. Child-on-child abuse is most likely to include, but may not be limited to:
  - a. Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
  - b. Abuse in intimate personal relationships between peers
  - c. Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element that facilitates, threatens and/or encourages physical abuse)
  - d. Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element that facilitates, threatens and/or encourages sexual violence)
  - e. Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- f. 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
  - g. Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth-produced sexual imagery)
  - h. Upskirting 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 to cause the victim humiliation, distress or alarm
  - i. 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)
54. 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.
55. If staff have any concerns about child-on-child abuse, or a child makes a disclosure to them, report immediately to the DSL.
56. The academy supports children to understand the law, this could include direct/indirect work from/with the Police Intervention Officer.
57. **Sexual violence and sexual harassment between children in schools**
58. Sexual violence and sexual harassment can occur:
- a. Between 2 children of any age and sex
  - b. Through a group of children sexually assaulting or sexually harassing a single child or group of children
  - c. Online and face-to-face (both physically and verbally)
  - d. Sexual violence and sexual harassment exist on a continuum and may overlap.
59. 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.



60. If a victim reports an incident, staff must 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. When supporting victims, staff will:
- a. Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
  - b. Regularly review decisions and actions, and update policies with lessons learnt
  - c. Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
  - d. 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
  - e. Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs
61. 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.
62. Staff should be aware of the importance of:
- a. Challenging inappropriate behaviours
  - b. Making clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and is not an inevitable part of growing up
  - c. Challenging physical behaviours (potentially criminal), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
63. If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to DSL immediately.
64. **Serious violence**
65. Indicators that may signal that a child is at risk from, or involved with, serious violent crime may include:
- a. Increased absence from school
  - b. Change in friendships or relationships with older individuals or groups

- c. Significant decline in performance
  - d. Signs of self-harm or a significant change in wellbeing
  - e. Signs of assault or unexplained injuries
  - f. 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))
66. For further information please go to the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance
67. Risk factors that increase the likelihood of involvement in serious violence include:
- a. Being male
  - b. Having been frequently absent or permanently excluded from school
  - c. Having experienced child maltreatment
  - d. Having been involved in offending, such as theft or robbery
68. 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.
69. **Children who self-harm**
70. Staff **must** always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary-age child has self-harmed serious consideration must be given to whether there are other underlying factors, including abuse.
71. **Domestic abuse**
72. 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.
73. 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 – for example, the impact of all forms of domestic abuse on children.

74. 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.
75. 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.
76. 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.
77. 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 – part of Operation Encompass (see section 80).
78. **Operation Encompass**
79. Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the designated safeguarding lead in school before the child or children arrive at school the following day.
80. 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.
81. Older children may also experience domestic abuse and/or violence in their relationships.
82. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.
83. The DSL will provide support according to the child's needs and update records about their circumstances.
84. **Homelessness**
85. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

86. The DSL will be aware of contact details and referral routes to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and following local procedures).
87. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

## Appendix 3: Information and support

1. There is a wealth of information available to support schools, colleges and parents/carers to keep children safe online. The following list is not exhaustive but should provide a useful starting point:
  - (a) Childnet provide guidance for schools on cyberbullying
  - (b) 'Educate\_against\_hate' provides practical advice and support on protecting children from extremism and radicalisation
  - (c) London Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
  - (d) NSPCC provides advice on all aspects of a school or college's online safety arrangements
  - (e) Safer recruitment consortium "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective
  - (f) Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones
  - (g) South West Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
  - (h) Use of social media for online radicalisation - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
  - (i) UK Council for Internet Safety have provided advice on sexting-in-schools-andcolleges and using external-visitors-to-support-online-safety-education
  - (j) Remote education, virtual lessons and live streaming
  - (k) Case studies on remote education practice are available for schools to learn from each other
  - (l) Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely
  - (m) London Grid for Learning guidance, including platform-specific advice
  - (n) National cybersecurity centre guidance on choosing, configuring and deploying video conferencing
  - (o) National cybersecurity centre guidance on how to set up and use video conferencing 23
  - (p) UK Safer Internet Centre guidance on safe remote learning

## 2. **Support for children**

- a. Childline for free and confidential advice
- b. UK Safer Internet Centre to report and remove harmful online content
- c. CEOP for advice on making a report about online abuse

## 3. **Parent Support.**

- (a) Child net offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- (b) Common sense media provide independent reviews, age ratings, & other information about all types of media for children and their parent/carers
- (c) Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- (d) Government advice about security and privacy settings, blocking unsuitable content, and parental controls
- (e) Internet Matters provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- (f) Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation
- (g) London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary-aged children safe online
- (h) Lucy Faithfull Foundation StopItNow resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- (i) National Crime Agency/CEOP Thinkuknow provides support for parents and carers to keep their children safe online
- (j) Net-aware provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- (k) Parentzone provides help for parents and carers on how to keep their children safe online

- (l) Parent info from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations
- (m) UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online

## Appendix 4: Role of the Designated Safeguarding Lead

### Role of the Designated Safeguarding Lead

The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). **The DSL must be a member of the senior leadership team.**

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.

The designated safeguarding lead should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

The DSL should understand when they should consider calling the Police and what to expect when they do.

During term time, the DSL should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns.

The DSL should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training as set out above, their knowledge and skills should be updated (for example via ebulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

### Deputy Designated Safeguarding Leads

The Deputy Designated Safeguarding Leads should be trained to the same standard as the Designated Safeguarding Lead and the role should be explicit in their job description. The deputy (or multiple deputies) must be able to perform the role of the DSL in the absence of the DSL.

The job descriptions can be found below for both DSL and DDSL.



## Appendix 5 - Job description Designated Safeguarding Lead

### JOB DESCRIPTION

**JOB TITLE:** Designated Safeguarding Lead (DSL)

**LOCATION:** Based at the academy

**REPORTING TO:** The Director of Education

**CONTRACT:** Permanent. Full time.

The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL will have a leadership position in the academy. They will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

#### **Key Accountabilities:**

##### **Manage referrals**

The Designated Safeguarding Lead will:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and to the local authority's designated officer;
- Refer cases where a crime may have been committed to the Police.

##### **Work with others**

The Designated Safeguarding Lead will:

- Liaise with the Raleigh Education Trust safeguarding lead to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations;
- As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member; • Liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice and expertise for all staff.
- Link closely with the three local safeguarding partners.

##### **Training**

The Designated Safeguarding Lead will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The Designated Safeguarding Lead will undertake Prevent awareness training.

The DSL will keep up-to-date with latest information about safeguarding so that their knowledge and skills are refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments).

#### **The DSL will:**

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the academy child protection policy and procedures, especially new and part time staff
- be alert to the specific needs of children in need, those with special educational needs and young carers
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the academy with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online
- have an overview of the filtering arrangements across the academy and be responsible for the monitoring arrangements for online safety.
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
- Ensure the academic/pastoral progress of all children who need a social worker by ensuring regular reviews of their holistic progress

#### **Raise Awareness**

The Designated Safeguarding Lead will:

- ensure the academy child protection policy is known, understood and used appropriately and is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, working with the Trust Safeguarding lead.
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the academy.
- link with the Local Safeguarding Partners to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- provide appropriate reports and information to the academy and the trust

#### **Child Protection File**

The DSL, where children leave the academy, will ensure their child protection file is transferred to the new school or college within 5 days. This should be transferred separately from the main pupil file,

ensuring secure transit, and confirmation of receipt should be obtained (if CPOMS is not the tool for transfer). Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEND in colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

### **Availability**

During term time the Designated Safeguarding Lead should always be available (during academy hours) for staff in the academy to discuss any safeguarding concerns.

## Appendix 6 - Job description Deputy Designated Safeguarding Lead

### JOB DESCRIPTION

**JOB TITLE:** Deputy Designated Safeguarding Lead (DDSL)

**LOCATION:** Based at the academy

**REPORTING TO:** The DSL and the Principal

The Deputy Designated Safeguarding Lead will support the DSL to safeguard and protect children (including online safety). The DDSL will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

#### **Key Accountabilities:**

##### **Manage referrals**

The deputy designated safeguarding lead will when the DSL is unavailable or out of the academy:

- refer cases of suspected abuse to the local authority children's social care as required
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and to the local authority's designated officer;
- refer cases where a crime may have been committed to the Police.

##### **Work with others**

The deputy designated safeguarding lead will support the DSL to:

- liaise with the Headteacher to inform her/him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations; • as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member; • liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

##### **Training**

The deputy designated safeguarding lead will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The deputy designated safeguarding lead will undertake Prevent awareness training.

The DDSL will keep up-to-date with latest information about safeguarding so that their knowledge and skills are refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments).

The DDSL will:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff
- are alert to the specific needs of children in need, those with special educational needs and young carers
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the academy may put in place to protect them.

### **Availability**

During term time the DDSL will always be available (during academy hours) for staff in the academy to discuss any safeguarding concerns. The DDSL will assume responsibility for safeguarding in the academy when the DSL is absent.

## Appendix 7 – Online Safeguarding / Filtering and Reporting



### Online Safeguarding / Filtering and Reporting

The Raleigh Education Trust has deployed Smoothwall as the border firewalls and internet filtering and safeguarding solution for the staff and learners for protection of their online digital learning environment. This provides real-time, content-aware and granular filtering control of all users and devices. A baseline 'block' list of categories has been pre-defined by the Trust and implemented across all schools, and does vary between staff users and student users.

The following details are based on the initial deployment of Smoothwall across the schools. Both the filtering and reporting will be developed and enhanced through usage and feedback from the schools and safeguarding leads as the system becomes further established to meet your teaching and learning needs.

There are a wealth of reports and logging features available, but the safeguarding elements are summarised in this document:

#### Immediate Safeguard Reporting:

Should an online activity trigger one of the pre-determined categories:

*Abuse, Adult content, Bullying, Criminal activity, Radicalisation, Substance abuse and suicide.*

The nominated safeguarding lead (Table 1) will receive an email notification (Figure 1) as an example of this. The nominated safeguarding lead will only receive notifications for users associated with their school.

Ambleside Academy	Denewood Academy Unity Academy	Westbury Academy	Woodlands Academy
Louise Marsh	Michelle Gull	Dan Siddons	Joanne Doidge
Joanne Barstow	Rebecca Jones	Ki Addis	Polly Smith

**Table 1**

The notification gives a baseline for further in-depth analysis if required of the user's browsing history. It is important to be aware that a trigger does not mean the user was explicitly searching for the content. When multiple breaches occur against the same user and ruleset, an instant alert is only sent every ten minutes, so as not to bombard the safeguarding leads with messages.

#### Reporting:

Smoothwall logs all internet activity, and these logs are identifiable to the individual user. Many reports can be generated (examples below – Table 2), these are currently on request and are being developed to allow wider access to these logs from any authorised user, from any location.

- Specific User or User Group
- Date / Time
- General Activity / Specific Categories or Specific URL

To simplify the understanding of user's online activity, the traffic is categorised by Smoothwall into pre-defined, recognisable category names. (See Table 2 for full category list).

Colwyn have configured the Smoothwall Cloud filter as per section 136 in the KCSIE Statutory guidance for schools and colleges released on 1 September 2023, addressing the following categories:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
  - **Contact:** being subjected to harmful online interaction with other users; for example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
  - **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

Figure 1:

From: [noreply@smoothwall.com](mailto:noreply@smoothwall.com) <[noreply@smoothwall.com](mailto:noreply@smoothwall.com)>  
Sent: 31 August 2023 5:00 PM  
To: Safe Guarding Lead <[safeguardinglead@school.co.uk](mailto:safeguardinglead@school.co.uk)>  
Subject: New Safeguarding Alerts for [studentuser@school.co.uk](mailto:studentuser@school.co.uk)



<sup>1</sup> Safeguarding Alerts have been created for the user [studentuser@school.co.uk](mailto:studentuser@school.co.uk). All of the individual alerts have been bundled together for you to view in the Alert Details section.

#### User Details:

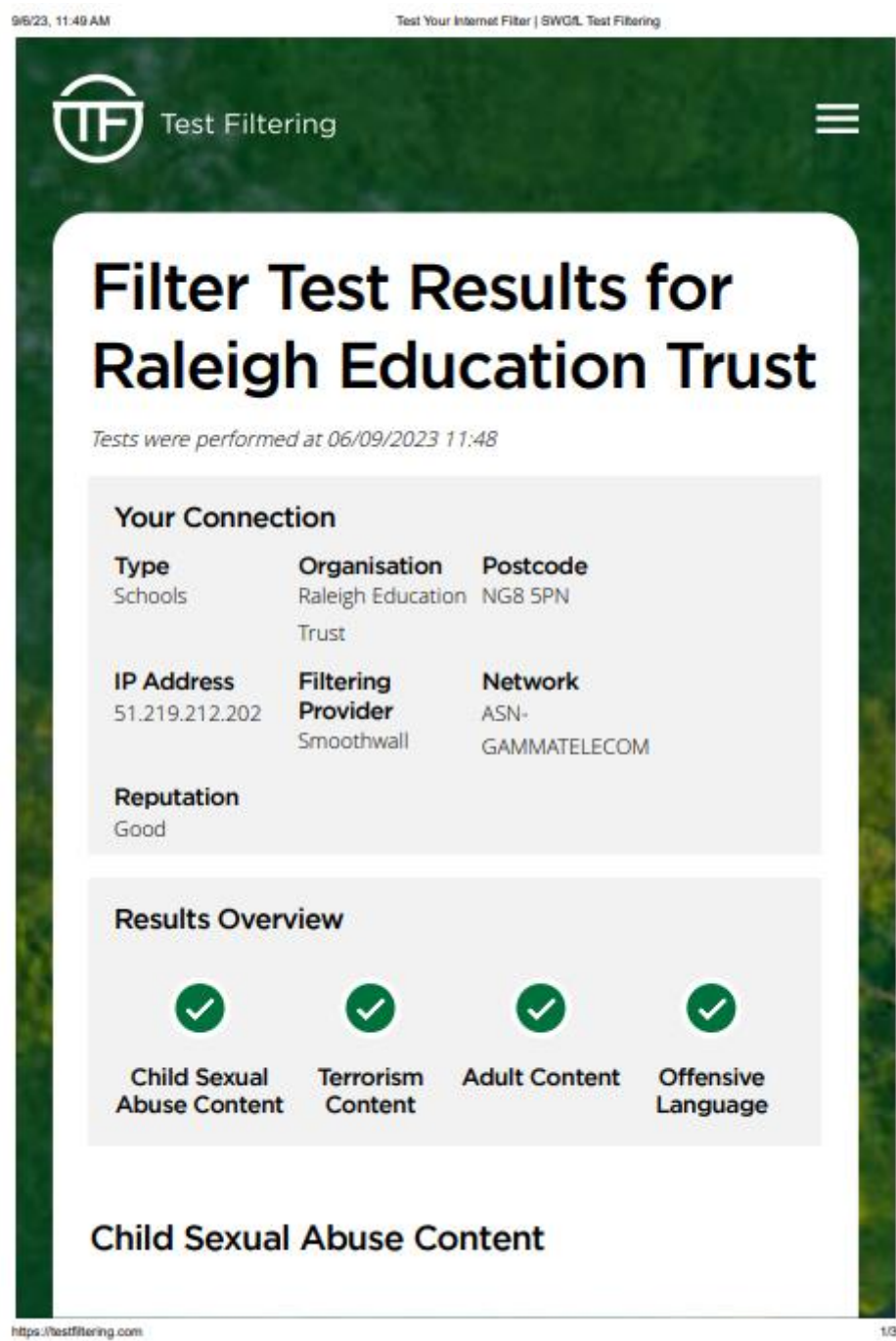
Username: [studentuser@school.co.uk](mailto:studentuser@school.co.uk)  
Local Groups: Trust - School Student Users  
Serial Number: XXX111XXX111XXX  
Tenant Name: XXX Academy  
Tenant ID: 01180f6b-00e7-437b-91b8-9cd7528ff174

#### Alert Details:

Date/time: Thu Aug 31 2023 16:51:47 GMT+0100 (British Summer Time)  
Theme: Adult content  
Level: 7  
Blocked: True  
Search terms:  
URL: <https://sex.com/>  
Categories: Adult Sites, Pornography

Figure 2 below shows examples of the test reports from testfiltering.com. The report confirms compliance with the DFE’s filtering and monitoring standards in schools (March 2023).

Figure 2







## Blocked

### Description

Tests whether you are blocking websites on the IWF Child Abuse Content URL list.

### Results & Recommendations

It appears that your filtering solution includes the IWF URL Filter list, blocking access to Child Sexual Abuse content online

## Terrorism Content



## Blocked

### Description

Tests whether you are blocking websites on the Counter-Terrorism Internet Referral Unit list (CTIRU).

### Results & Recommendations

It appears that your filtering solution includes the Counter-Terrorism Internet Referral Unit (CTIRU) URL filter list, blocking access to unlawful terrorist content online

## Adult Content



## Blocked

### Description

Test whether your Internet filter blocks access to pornography websites

### Results & Recommendations

It appears that your filtering solution includes blocking for online pornography

## Offensive Language



### Blocked

#### Description

Accesses a page containing offensive language to test if your filtering software blocks it

### Results & Recommendations

It appears that your filtering solution includes blocking for offensive language

[Terms](#)[Privacy](#)[Cookies](#)[Sign In](#)

Table 2 – Category List (Subject to change).

Name	Example URL	Description
Legal & Liability Issues		Sites which could cause legal or liability issues
Child Abuse		Child abuse keywords contributed by the IWF
Drugs	<a href="http://www.weedguru.com">www.weedguru.com</a>	Sites pertaining to the sale, manufacture, promotion or use of recreational and prescription drugs
Intolerance	<a href="http://www.stormfront.org">www.stormfront.org</a>	Sites related to or promoting intolerance of any kind
Piracy and Copyright Infringement		Sites containing pirated copyrighted material for illegal download or streaming
Self Harm	<a href="http://www.sanctioned-suicide.org">www.sanctioned-suicide.org</a>	Sites relating to self-harm, suicide and eating disorders
Pornography	<a href="http://www.pornhub.com">www.pornhub.com</a>	Sites dedicated to Pornographic content, whether audio/visual or textual
Terrorism		Sites provided by the Office of Security and Counter-Terrorism branch of the UK Home Office, containing pro-terrorism material
Violence	<a href="http://www.hockeyfights.com">www.hockeyfights.com</a>	Sites dedicated to violence, whether this is through sport or bullying
Adult Themes		Sites which may be unsuitable for a younger audience.
Abortion	<a href="http://optionsforabortions.com">optionsforabortions.com</a>	Sites which refer to abortion, including "pro-life" and "pro-choice".
Adult entertainers		Use in conjunction with search term filtering to prevent pornographic web searches.
Adult Sites	<a href="http://www.urbandictionary.com">www.urbandictionary.com</a>	Content which is primarily adult in nature, content such as bad language or adult jokes, but not pornography.
Alcohol and Tobacco	<a href="http://www.guinness.com/">www.guinness.com/</a>	Sites pertaining to the use, sale, production and promotion of alcoholic drinks and tobacco (including e-cigarettes)
Body piercing and Tattoos	<a href="http://www.tattoos.com">www.tattoos.com</a>	Sites which promote, sell, advertise or discuss any body modification such as piercing and tattoos.
Criminal Activity	<a href="http://www.myfakeid.biz">www.myfakeid.biz</a>	Sites providing either instruction or tools facilitating illegal activity, such as lock picking, fake IDs and fraud.
Fireworks	<a href="http://www.fireworks.us">www.fireworks.us</a>	Purchase and manufacture of fireworks & pyrotechnic devices

Gambling	www.888.com	Sites providing gambling and gambling related services, casino's, sports betting etc..
Gore		Sites describing or displaying gory content.
Inappropriate/Vulgar Search Terms		Contains lists of Inappropriate/Vulgar/Swear words, only search terms, no content or URLs
Naturism and Nudism	www.clothesfree.com	Sites that contain nudist pictures and/or promote a nudist lifestyle
Non-pornographic Nudity	parkerpfister.com	Sites containing nudity that is not pornographic, e.g artistic nudity
Provocative Images	www.yummylook.com	Sites which contain pictures of intimate, alluring, revealing attire or other types of suggestive clothing, such as lingerie and swimsuits.
Restricted to Adults	www.rtalabel.org	Category containing the "Restricted to Adults" special tag; see <a href="http://www.asacp.org/">http://www.asacp.org/</a>
Sexuality Sites	www.lovepanky.com	Content based primarily on sexuality which may be unsuitable for a younger audience.
Weapons : Hunting and Sporting	www.thehuntinglife.com	Hunting and target shooting weapons.
Weapons : Military	www.nps.gov/spar	Sites describing weapons of war, including those in a historical context.
Weapons : Personal Weapons	www.gunsite.com	Sites discussing and/or selling of weapons, including firearms, blades, explosives and incendiaries.
Business and Corporate		Businesses and organisations, including government and non-profits.
Agriculture	masseyferguson.com	Sites related to agriculture - Machinery, livestock, crops
Business and Corporate	www.abc.xyz	Sites for businesses and commercial organisations, where the organisation provides paid for goods or services.
Charity and Non-profit	www.christianaid.org.uk	Charity and non-profit organisations
Crowdfunding	patreon.com	URLs of sites that their primary business is to raise capital for a project or venture via crowdfunding
Government	www.gov.uk	Government websites and websites related to governmental organisations
Household Utilities	www.britishgas.co.uk	Gas/Water/Electricity utilities websites, including phone & Internet
Law	www.lawsociety.org.uk	Lawyer/Solicitor/Barrister websites, law societies and sites whose whole theme is Law

Travel and Transport Services	<a href="http://www.nationalrail.co.uk">www.nationalrail.co.uk</a>	Information or booking sites related to transportation such as trains, taxis, or airlines
Entertainment		Entertainment, sport and online games
Books	<a href="http://www.lrb.co.uk">www.lrb.co.uk</a>	Sites selling, reviewing or discussing books or audio books in any format
Celebrity	<a href="http://www.perezhilton.com">www.perezhilton.com</a>	Sites relating to any celebrity media, fan sites or news
Computer Games	<a href="http://www.ign.com">www.ign.com</a>	Sites related to computer games but not in browser playable games
Desktop Customisation	<a href="http://www.screensavers.com">www.screensavers.com</a>	Sites providing screen savers, wallpapers, desktop themes and similar content
Events	<a href="http://www.chicagothemusical.com">www.chicagothemusical.com</a>	Sites that promote and discuss live events e.g. live dramatic/theatrical productions and festivals
Graphic novels	<a href="http://www.tokyopop.com">www.tokyopop.com</a>	Graphic novels, Manga, Anime, and other illustrated works, excluding Hentai as this is Pornography
Jokes and Humour	<a href="http://www.ajokeaday.com">www.ajokeaday.com</a>	Sites dedicated to humour, including jokes, video, amusing images and satire
Magazines	<a href="http://www.horsemagazine.com">www.horsemagazine.com</a>	Sites selling, reviewing or discussing magazine content, printed or online
Movies and Film	<a href="http://www.imdb.com">www.imdb.com</a>	Movie sites, reviews and discussion
Museums and Art galleries	<a href="http://www.vam.ac.uk">www.vam.ac.uk</a>	Sites that promote, exhibit, and/or display works of art or objects of historical and or cultural significance
Music	<a href="http://www.lyrics.com">www.lyrics.com</a>	Sites that discuss, promote/market and distribute music. Including fan sites, lyrics sites, playlist sites, artist and musical subjects sites
Online Games	<a href="http://www.miniclip.com">www.miniclip.com</a>	Sites providing games that can be played in a browser
Radio and TV	<a href="http://www.radiotimes.com">www.radiotimes.com</a>	Non-news related radio and television, including radio streaming sites
Sport	<a href="http://www.eurosport.co.uk">www.eurosport.co.uk</a>	Sites discussing or promoting any sport, including sports team homepages
File and Image Hosting		Sites which provide file hosting services.
File Hosting	<a href="http://www.mega.io">www.mega.io</a>	Sites that offer online file storage services on remote servers for backup or exchange purposes
Image Hosting: Moderated	<a href="http://www.photobucket.com">www.photobucket.com</a>	Sites that provide image/gif hosting services that are vetted or controlled with a conditions of use policy or moderated by humans

Image Hosting: Unmoderated	www.imgur.com	Sites that provide image/gif hosting services that include potentially pornographic or otherwise offensive content
Finance		Finance related sites, including banks and other financial service providers.
Cryptocurrency	www.bitfinex.com	Cryptocurrency websites
Financial Services	www.hsbc.com	Finance sites including investment advice, but not Online Banking portals
Online Banking	www.onlinebanking.natwest.com	Sites providing online banking access, or online credit card management
Payday Loans	www.cashasap.co.uk	Online providers of "Payday Loans"; short term cash loans typically with high rates of interest
IT & Technical		Sites relating to computing, technology and the Internet.
Collaboration Software	www.lucidchart.com	Sites that allow collaboration on documents/projects via shared link/software
Computing	www.slashdot.org	Sites related to computing but not games. e.g programming languages
DNS over HTTPS	dns.google	Subdomains/URLs used to facilitate the use of DNS over HTTPS
Games Consoles	www.playstation.com	Sites that provide authentication for, and content used in, games consoles
Microsoft Office 365	www.office.com	Domains required for Microsoft Office 365 to function.Warning: Includes live.com, msn.com and outlook.com
Mobile Apps : ClassDojo App	www.classdojo.com	URLs used by the ClassDojo App
Mobile Apps : Covid-19 Exposure Notification Apps		Mobile applications developed by public health authorities which use the Covid-19 Exposure Notification System developed by Google and Apple
Mobile Apps : Emile Education	https://emile-education.com	
Mobile Apps : Facebook App	www.facebook.com	URLs used by the Facebook Mobile App
Mobile Apps : Snapchat App	www.snapchat.com	URLs used by the Snapchat Mobile App
Mobile Apps : TikTok APP	tiktok.com	Domains and URLs used by the TikTok Android and iOS mobile application
Mobile Apps : Twitter App	www.twitter.com	URLs used by the Twitter Mobile App

Mobile Apps : WhatsApp	whatsapp.com	Used to allow or block the WhatsApp mobile application
Mobile/Cell Phones	www.o2.co.uk	Sites providing content about mobile/cell phones, reviews, ratings, providers etc...
Peer-to-peer Networking	www.1337x.to	Peer-to-peer network sites
Remote Desktop	www.teamviewer.com	Sites offering remote desktop and remote administration software tools
Software : Adobe Creative Cloud		URLs/IPs necessary for Adobe Creative Cloud to function properly
Software : AEM Web Portal		IP and URLs that are used by AEM (Autotask Endpoint Management)
Software : Google Drive	drive.google.com	URLs used by Google Drive/Docs/Sheets/Slides
Software : Google Meet	meet.google.com	Domains and URLs used by Google Meet
Software : GoTo Software Suite	www.gotomypc.com	Contains URLs for GoTo products (GoToMeeting, GoToWebinar, GoToTraining, GoToAssist, GoToMyPC, and OpenVoice)
Software : Hudl App	www.hudl.com	Domains/URLs used by the sports APP Hudl
Software : Lightspeed MDM	lsmdm.com	Domains and URLs used by Lightspeed's Mobile Device Management software
Software : Loom	loom.com	URLs necessary for Loom Screen Recording Software to work
Software : Senso		Domains used by the Senso platform
Software : Skype	www.skype.com	Domains and IPs that are used by Skype
Software : youHQ	https://www.youhq.co.uk	Domains, URLs, and YouTube videos used by the youHQ school wellbeing platform.
Software : Zoom	www.zoom.us	List of URLs & IPs provided by Zoom's KB article
Web hosting	www.godaddy.com	Sites which offer domain names and web hosting services
Webmail	mail.google.com	Sites dedicated to email/webmail
What's my IP services	www.myip.com	Sites and services which display your public IP address
Information and Reference		Informational sites and reference materials
Academic institutions	www.harvard.edu	Sites of schools, universities, colleges and other learning centres

AI Tools	openai.com	General AI (AGI) tools are a set of software and technology that aims to simulate or replicate human-like intelligence across a wide range of tasks. These tools are designed to be flexible, adaptable and able to learn and improve on their own. They can be used for autonomous vehicles, chatbots, and virtual assistants. Examples include machine learning frameworks, NLP libraries and deep learning architectures.
Education and Reference	www.sparknotes.com	Sites that provide materials and information that aid in learning
Mapping	google.com/maps	Sites which provide geographical mapping services including those that promote or provide opportunity for travel planning
News	www.bbc.co.uk/news	Sites whose primary aim is to present local, national, or international news, or news relating to a specific topic.
Plagiarism	www.ukessays.com	Sites offering paid help and/or pre-written homework material for students
Politics	labour.org.uk	Sites belonging to a Political party or wholly political based sites
Sex Education	www.sexeducationforum.org.uk	Educational sites relating to sexual activity including reproduction, contraception and safe sex
Translation	translate.google.com	Sites which provide translation services, such as blocks of text or providing entire site translation
Weather	www.weather.org	Sites dedicated to weather information and forecasts
Wikipedia: Editing		Block this category to deny Wikipedia changes and Wikipedia logins.
Lifestyle		Various inoffensive yet non-work-related sites
Clothing & Accessories	www.tiffany.com	Sites selling, promoting and discussing clothing, shoes, jewellery and fashion
Food and Dining	www.snackworks.com	Sites relating to food reviews, recipes, restaurants and catering
Gardening	www.crocus.co.uk	Sites dedicated to gardening as a hobby, selling gardening products or reviewing gardening methods/techniques
Health and Fitness	puregym.com	Sites dedicated to health and fitness, gyms, fitness blogs, health sites



Household and DIY	<a href="http://www.diynot.com">www.diynot.com</a>	Sites dedicated to to DIY projects, tools and household content
Online Auctions	<a href="http://www.ebay.co.uk">www.ebay.co.uk</a>	Online auction sites where auction style sales are carried
Online Shopping	<a href="http://www.sainsburys.co.uk">www.sainsburys.co.uk</a>	Sites where purchases can be made, of any kind
Parenting and Baby	<a href="http://www.mamasandpapas.com">www.mamasandpapas.com</a>	Sites providing information or products for parenting, pregnancy, babies and infants
Pets	<a href="http://www.petsathome.com">www.petsathome.com</a>	Sites selling or discussing pets or pet related goods
Real estate and Property	<a href="http://www.realtor.com">www.realtor.com</a>	Sites that discuss, promote/market and provide information on renting, buying, or selling real estate or properties
Religion	<a href="http://www.newchristian.com">www.newchristian.com</a>	Sites where the main theme/content is religion
Time-wasting	<a href="http://www.isitchristmas.com">www.isitchristmas.com</a>	Unproductive sites popular with children
Toys and Games	<a href="http://www.thetoyshop.com">www.thetoyshop.com</a>	Sites which promote, discuss and sell toys and games
Vacations	<a href="http://www.kayak.co.uk">www.kayak.co.uk</a>	Sites related to travel and holidays
Vehicles and Motoring	<a href="http://www.harley-davidson.com">www.harley-davidson.com</a>	Sites which advertise, promote, discuss and offer information on vehicles and automobiles
Wedding	<a href="http://www.weddingplanner.co.uk">www.weddingplanner.co.uk</a>	Sites discussing weddings or selling wedding related items or services
Malware and Hacking		Hacking, warez and phishing sites, including sites containing information on how to bypass web filters
Hacking	<a href="http://www.kitploit.com">www.kitploit.com</a>	Sites with the main theme of hacking/cracking, regardless of "whitehat" or "black-hat"
Internationalised Domain Names	<a href="http://www.xn--strmsel-c1a.se">www.xn--strmsel-c1a.se</a>	Domains that include non-ASCII characters which are translated to punycode
Malware and Phishing		Sites hosting viruses, malware, adware, spyware or trojans
Web Proxies	<a href="http://www.proxysite.com">www.proxysite.com</a>	Web proxy sites and other tools designed to circumvent filtering
Medical	<a href="http://www.nhs.uk">www.nhs.uk</a>	Medical and childcare sites
Medical Information	<a href="http://www.nhs.uk">www.nhs.uk</a>	Sites containing content about health and medical matters
Multimedia		Audio/video, radio, peer-to-peer and other multimedia sites

Amazon Prime	www.amazon.com/PrimeVideo	Amazon Prime instant video and Amazon Prime music
Audio and Video	www.vimeo.com	Sites providing audio or video downloads or streaming
BBC iPlayer	www.bbc.co.uk/iplayer	Domains and URLs for the BBC iPlayer service
Disney+	disneyplus.com	Sites used by Disney's streaming service Disney+ (DisneyPlus)
iTunes	www.apple.com/itunes	Domains and URLs for Apple's iTunes service
ITV Player	www.itv.com/hub/itv	Domains and URLs for the ITV Player service
Live Streaming	www.livestream.com	Domains and URLs that stream live video
Netflix	www.netflix.com	Domains and URLs for Netflix
Spotify	spotify.com	Domains and URLs used by the Spotify client and Web app
Vimeo	vimeo.com	URLs used by Vimeo, to be used with Force Mature content filter content modification
YouTube	www.youtube.com	Domains and URLs for YouTube
YouTube Allowed Videos and Playlists		Allowed YouTube video and playlist IDs
YouTube HD streaming		Domains and URLs for high definition streams from YouTube
Search Engines		Search Engines
Google Instant Previews		Thumbnail previews of Google web search results
Google Search		URLs used by the Google search engine
Image Search	images.google.co.uk	URLs used for image search
Job Search	www.monster.com	Sites for job search
Question & Answer	www.wikihow.com	How To, instructional and Q&A sites
Reverse Image Search	www.tineye.com	Reverse image search engines which offer query-by-image and image similarity functions

Search Suggestions		Disables automatic search suggestions on Google, Bing, Ask and YouTube search engines
Secure Search	www.google.com	SSL encrypted search services
Web Search	www.google.com	Sites providing web search functionality

Web Search POST		Search engines that use the body of POST requests to contain search terms
Social Media		Social networking, dating and chat sites
Blogs	www.blogspot.com	Sites hosting blog content of any kind
Dating and Companionship Sites	www.match.com	Domains and URLs that provide dating and companionship services
Discussion Forums	www.edugeek.net/forums	Sites dedicated to discussion forums, e.g. phpBB
Facebook	www.facebook.com	Domains and URLs for the Facebook network
Facebook: Posts & Updates		Block this category to deny Facebook changes such as posts, comments, likes, uploading of photos, videos or notes. Requires HTTPS interception
Instagram	instagram.com	URLs used by Instagram
Instant Messaging VoIP and Web Conferencing	www.trillian.im	Sites which contain messenger clients and web-based messaging sites, as well as any form of Voice over IP based chat service
Social Networking Sites	www.facebook.com	Social Networking sites
Twitter: Updates		Block this category to deny Twitter changes such as tweets, retweets, follows, posting of photos, videos or account changes. Requires HTTPS interception
Web Infrastructure		Web infrastructure and miscellaneous domains.
Adverts	ads.whatsonstage.com	Advert servers and advert URLs
APIs & Web Libraries	api.twitter.com	Domains and URLs used by APIs and web libraries
Connect for Chromebooks	googleusercontent.com	Domains and URLs used for Google's service Connect for Chromebooks
Content Delivery	www.akamai.com	Content Delivery Networks and supplementary infrastructure servers for various existing sites
Internet Speed Tests	www.speedtest.net	Public web services used to measure the speed of an internet connection
Parked Domains	sedoparking.com	Inactive web domains "parked" by a registrar, advertiser or domain owner
Smoothwall Products		This category contains the Domains that the Smoothwall Suite uses.

Software Updates	windowsupdate.microsoft.com	Domains used to download software updates
SSL / CRL	crl.verisign.com	Support domains for SSL services including Certificate Authorities, Certificate Revocation Lists, OCSP and Extended Validation servers
Transparent HTTPS incompatible sites		Sites used by clients which do not support HTTPS server name indication (SNI)
URL Shortening	bit.ly	Sites which provide a URL shortening and forwarding / link service
User tracking and Site stats	doubleclick.net	Sites known to track visitor statistics for analytics and reporting purposes