



**BRITISH INTERNATIONAL SCHOOL**

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# **SAFEGUARDING AND STUDENT PROTECTION POLICY**

September 2018



## Key facts

**The safety of our students is our number one priority**

Safeguarding and promoting the welfare of our students is everyone's responsibility

We operate within a culture of openness and recognise and accept that abuse can happen in any organisation

We are a 'sharing organisation' – all concerns should be reported

**All concerns about a student (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL)**

**In the event that a student is in immediate danger or at risk of harm a referral should be made to Designated Child Protection Officer and/or the police immediately**

Allegations or higher level concerns about another staff member or adult in school should be referred to the Principal

Allegations or higher level concerns about the Principal should be referred to the Board Chair

All low level concerns or "nagging doubts" should be shared with the DSL or DDSL



## Introduction

This policy complies with:

- 'The Education (Independent School Standards) Regulations' (ISSR) - 2014
- 'Keeping students Safe in Education' (KCSIE) - Sep 2016
- 'Working Together to Safeguarding students' (WTSC) - 2015
- 'Prevent Duty Guidance for England and Wales' - 2015
- 'Statutory Framework for the Early Years Foundation Stage' - 2014

It is also informed by DfE advice, 'What to do if you are worried a student is being abused – advice for practitioners' 2015 and 'Sexual Violence and Harassment between children in Schools and Colleges', May 2018.

In student protection matters the school will follow the inter-agency and student protection procedures laid down by the relevant Municipality Social Work Centre - Child Protection Office in Serbia.

## Application

This policy applies to all teaching, non-teaching, residential, pastoral, support, contract staff and ancillary staff, volunteers, non-school based staff and any other adults working at the School. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned unless otherwise stated. It applies to adults in the early years phase of the School.

Throughout the document, the term DSL is used.

This Safeguarding Policy and the Code of Conduct applies to all students and adults in the school, including when being educated off-site and undertaking an educational visit. It also applies to students who are on an exchange and being hosted by the School.

## Publication

This Policy is updated annually and is published to all staff and volunteers.

Rather than duplicating content from Keeping Students Safe in Education (September 2016) in this policy, it should be understood that the School will always refer to this document as the benchmark for all safeguarding practice and decision making.

## Overview of this policy

- Contact details
- Part A: Aims and objectives of safeguarding in our school
- Part B: Actions where there are concerns about a student
- Part C: Identifying concerns – types and signs of abuse and neglect
- Part D: Specific safeguarding issues
- Part E: Actions where there are concerns or allegations about the conduct of an adult
- Part F: Responsibilities and training
- Part G: Proprietorial oversight
- Part H: Other safeguarding policies



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## Contact details

The following pages outline the contact details of named staff in school, and external agencies linked to student protection and safeguarding.

Where a student is in immediate danger or at risk of harm a referral should be made to students' social care and/or the police immediately.

<b>School and Official Contacts</b>	
Designated Safeguarding Lead (DSL)	Aleksandra Keserovic, Principal
Deputy Designated Safeguarding Lead (DDSL)	Jelena Milicevic, School Counsellor
Principal	Aleksandra Keserovic
Board Chair	Branislava Keserovic
<b>Officials outside school Contacts</b>	
Municipality Social Work Centre - Child Protection Office	011/2652-544 011/2650-542 062/8-088-300
<b>Police</b>	
Local Police Emergency	192
Local Police	011/3618-744
<b>Location of student protection documents in school</b>	
English and National Guidance documents, e.g. referral forms	Director's Office



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## UK National Contacts

NSPCC 24/7 Helpline	Tel: 0808 800 5000 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
NSPCC Text line	88858
NSPCC Student Line	Tel: 0800 1111
NSPCC FGM helpline	Tel: 0800 028 3550 Email: <a href="mailto:fgmhelp@nspcc.org.uk">fgmhelp@nspcc.org.uk</a>
NSPCC Whistleblowing helpline	Tel: 0800 028 0285 (8am – 8pm) Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
DfE Prevent helpline for schools & parents	Tel: 020 7340 7264 (non-emergency) Email: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>
The Lucy Faithfull Foundation (LFF)	Tel: 0800 1000 900 Email: <a href="mailto:help@stopitnow.org.uk">help@stopitnow.org.uk</a> <a href="http://www.parentsprotect.co.uk">www.parentsprotect.co.uk</a>
National Bullying Helpline	Tel: 0845 22 55 787
UK Safer Internet Centre helpline for School Staff	Tel: 0844 381 4772 Email: <a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a>
Internet Watch Foundation hotline for reporting criminal content	<a href="http://www.iwf.org.uk">www.iwf.org.uk</a>
Educate Against Hate	<a href="http://educateagainsthate.com">http://educateagainsthate.com</a>



## Part A: Aims and objectives of safeguarding in our school

Our commitment is to safeguard and promote the welfare, health (including mental health) and safety of our students by creating and maintaining an open, safe, caring and supportive atmosphere.

We have three primary aims:

- Prevent harm;
- Protect students from harm;
- Support students and staff when student protection and safeguarding incidents occurs.

The school achieves these aims by:

- Ensuring the recruitment of individuals who are suitable and appropriate to work with students and who have positive safeguarding attitudes.
- Providing excellent pastoral care and fostering optimism and a positive school atmosphere where students feel secure and are encouraged to talk. Students are encouraged to find a person (whether a staff member or peer) whom they trust and to speak to that person about any issues which may be worrying them. Students are additionally reminded of specific individuals with whom they are able to talk.
- Valuing and promoting effective relationships with parents and professionals from other agencies.
- Teaching students, via PSHE and a varied curriculum, to identify, reduce and manage risks. This includes educating students, through regular internal and externally provided ICT safety talks, about the safe use of electronic equipment and access to the internet.
- Ensuring that students are safeguarded from potentially harmful and inappropriate online material through embedding a whole school approach towards online safety, including the acceptable use of mobile technology and the use of appropriate filters and monitoring systems.
- Ensuring that all staff are properly trained, supported and supervised to enable them to identify abuse and welfare concerns and deal with such concerns appropriately and sensitively.
- Encouraging staff to discuss student protection, safeguarding and welfare concerns confidentially with the DSL in order to ensure they have confidence in their own abilities to identify and appropriately handle welfare concerns and cases of abuse and neglect.
- Creating a culture of vigilance, openness, trust and transparency in which any concerns about the conduct of staff, visitors and other adults in school can be shared and dealt with in an appropriate and sensitive manner.
- Following the procedures laid down in this Policy and by the local Student Services support agencies as appropriate.



## Part B: Actions where there are concerns about a student

### Safeguarding is everyone's responsibility

Safeguarding is everyone's responsibility and all staff, regardless of their role, should exercise vigilance and be watchful for, and aware of, signs that a student may be in need of help as well as the signs of abuse and neglect (see below for a list of some common signs). If a staff member has any concerns about a student s/he should report the concern to the DSL. If staff members have nagging doubts or questions they should speak immediately to the DSL or in their absence to the DDSL. The DSL (or DDSL if appropriate) will discuss the matter with the member of staff and will decide on an appropriate course of action. This discussion and actions may be recorded if found appropriate by the DSL/DDSL.

### Early help and inter-agency work

All staff should be aware of the early help process, and understand their role in it. This includes:

- identifying emerging problems and potential unmet needs;
- liaising with the DSL;
- sharing information with other professionals to support early identification and assessment; and
- in some cases, acting as the lead professional in undertaking an assessment of the need for early help.

All staff should be alert to identifying students who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a student's life. If a member of staff has a concern that a student may be in need of early help then s/he should, in the first instance, report it and discuss early help requirements with the DSL.

Where a student and family would benefit from coordinated support this would be discussed with the DSL who will make appropriate arrangements. If early help is appropriate, where they are not taking the lead, then the DSL should support the member of staff in liaising with other agencies as appropriate.

Effective early help in a school setting involves the School (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate, to help address the assessed needs of the student and their family early, in order to significantly improve the outcomes for the student. It is hoped that in each case this should improve the welfare of the relevant student. However, each case should be kept under constant review, and consideration should be given to a referral to student's social care if the student's situation does not appear to be improving.

### Student in need, suffered or at risk of significant harm or in immediate danger

If at any time it is considered that the student may be a student in need, has suffered or is at risk of significant harm, or is in immediate danger, a referral should be made immediately to students' social services – in the local area where the student lives. In accordance with national procedures the parents must also be informed unless they are deemed to be a risk to the student. In cases of significant harm or immediate danger the police should be notified immediately.

### Reporting and handling a concern

When reporting and/or handling a concern about a student all staff should act with the utmost discretion and any students who are involved will receive appropriate care and support. Staff should always listen to a student who wants to talk about a concern. If a student tells a member of staff that they know about or have been a victim of student abuse or neglect the member of staff should:



- Allow the student to speak freely and remain calm. Do not interrupt the student or be afraid of silences.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me". Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
- Limit questioning to the minimum necessary for clarification and avoid leading questions such as, "Has this happened to your siblings?"
- At an appropriate time tell the student that the matter will be referred in confidence to the appropriate people. Promises of confidentiality should not be given (see Confidentiality section below).
- Tell the student what will happen next. The student may want to accompany you to see the DSL, otherwise let the student know that someone will come to see them before the end of the day.
- Seek support if they feel distressed.

## Peer on peer abuse

If a member of staff thinks for whatever reason that a student may pose a risk of harm to himself or to others (this includes but is not limited to cases of serious bullying) the member of staff should report their concern and talk to the DSL or DDSL immediately (see the School's Anti-Bullying Policy for further details).

All staff should be aware (a) that safeguarding issues can manifest themselves via peer on peer abuse; and (b) that students are capable of abusing their peers. Such abuse should never be tolerated or normalised through the common myth that it is part of growing up. This is most likely to include but is not limited to bullying (including cyber bullying), gender based violence, grooming, inappropriate or harmful sexualised play (younger students), sexual assaults, sexting and gender issues within groups of girls and boys. Should an allegation of abuse be made against another student all students involved (whether perpetrator or victim) will be treated as being "at risk". Where there is reasonable cause to suspect that a student is suffering, or likely to suffer, significant harm, the allegation will be referred to students' social services. The concern may indicate that one or more of the students concerned may be in need of additional support by local agencies and in those cases the DSL should follow local inter-agency procedures. Where appropriate, the matter will be dealt with under the School's Behaviour Policy with the use of relevant disciplinary sanctions.

## Confidentiality

Staff should never guarantee confidentiality to students or adults wishing to tell them about something serious as this may ultimately not be in the best interests of the student. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure that the appropriate action is taken. All staff involved will also take whatever steps they can to protect the informant from any retaliation or unnecessary stress that may occur after a disclosure has been made.





## Part C: Identifying concerns - types and signs of abuse and neglect

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

### Abuse

Abuse is a form of maltreatment of a student. Somebody may abuse or neglect a student by inflicting harm or by failing to act to prevent harm. Students may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another student or students.

One of the best ways to help students is by being aware of the signs of possible abuse. All staff should be aware of the signs of abuse and neglect so that they are able to identify students who may be in need of help or protection. These signs can take many forms including physical injuries and behavioural indicators. Although in most cases these signs will manifest themselves in students who are themselves the victims of abuse, it is important to remember that adults can also display significant indicators which suggest the existence of their own abuse as students. Staff should also be alert to any comments or jokes made by other students in the School.

All staff should familiarise themselves with the list below which, although not exhaustive, includes common signs of abuse which, if present, may indicate a problem requiring follow up. It is important to recognise that some young people who are being sexually exploited or abused do not exhibit any external signs of this abuse. Sometimes students don't even realise that what's happening is abuse. It is also sometimes difficult to tell the difference between injuries suffered as part of normal student hood activities and those caused by abuse. If a staff member is unsure he/she should discuss the case with the DSL. The [NSPCC website](#) includes advice on how to spot signs and patterns of abuse and neglect.

### Physical abuse

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

There isn't one sign to look out for that will prove that a student is being physically abused. But if a student often has injuries, there seems to be a pattern, or the explanation doesn't match the injury then this should be investigated. Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;
- respiratory problems from drowning, suffocation or poisoning;
- untreated or inadequately treated injuries;
- bruising which looks like hand or finger marks;
- cigarette burns, human bites; or scarring, scalds and burns.

### Sexual abuse

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



images, watching sexual activities, encouraging students to behave in sexually inappropriate ways, or grooming a student in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other students. Signs of sexual abuse displayed by students may include:

- pregnancy
- sexually transmitted infection
- pain/itching/bleeding/bruising/discharge to the genital area/anus;
- urinary infections/sexually transmitted diseases;
- difficulty walking or sitting; or persistent sore throats.

## Neglect

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

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a student from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- or
- ensure access to appropriate medical care or treatment.

It may also include neglect or, or unresponsiveness to, a student's basic emotional needs. Signs of possible neglect include:

- the student seems underweight or is very small for their age;
- they are poorly clothed, with inadequate protection from the weather;
- they are often absent from school for no apparent reason; or
- they are regularly left alone, or in charge of younger brothers or sisters.

## Emotional abuse

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

## Behavioural signs of abuse and neglect

If a student is being abused, their behaviour may change in a number of ways. For example they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than



- other students;
- become angry or disinterested and/or show little creativity;
- seem frightened of certain adults;
- become sad, withdrawn or depressed;
- have trouble sleeping;
- become sexually active at a young age;
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other students;
- refuse to change for gym or participate in physical activities;
- develop eating disorders;
- self-harm;
- refuse to attend school or run away from home;
- lack confidence or have low self-esteem; or use drugs or alcohol.

### **Students with Special Educational Needs and/or Disabilities**

Students with special educational needs (SEN) and disabilities can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect in this group of students. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration;
- that students with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these challenges.

### **Signs of abuse or neglect manifested by the parents or other responsible adult**

- unrealistic expectations of the student i.e. demands a level of academic or physical performance of which they are not capable;
- offers conflicting or unconvincing explanation of any injuries to the student;
- appears indifferent to or overtly rejects the student;
- denies existence of or blames the student for the student's problems at home or at school;
- sees and describes the student as entirely worthless, burdensome or in another negative light;
- refuses offers of help for the student's problems; or
- is isolated physically/emotionally.

### **Grooming**

Grooming is the process by which an individual prepares a student, significant adults and the environment for abuse of this student. Students and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female. They could be any age. Many students and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified. Students may:

- be very secretive, including about what they are doing online;
- have older boyfriends or girlfriends;
- go to unusual places to meet friends;
- have new things such as clothes or mobile phones that they can't or won't explain;



- have access to drugs and alcohol;
- go missing from home or school;
- display behavioural changes;
- have sexual health issues; or
- present as suicidal, self/harming, feeling depressed, unworthy.

In older students, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the NSPCC website for further information about grooming.

### Signs of grooming and/or online abuse

A student may be experiencing abuse online if they:

- spend lots, much more, or much less time online, texting, gaming or using social media;
- are withdrawn, upset or outraged after using the internet or texting;
- are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
- have lots of new numbers on their phones, lap tops, texts or email addresses.

### Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit these signs and if an individual exhibits some or all of these signs it does not mean that they are a sex offender:

- overly affectionate behaviour with a student;
- affording special attention or preferential treatment to a student;
- excessive time spent alone with a student outside of the classroom/school;
- frequently spending time with a student in private or isolated areas;
- transporting a student to or from the school;
- making friends with a student's parents and visiting their home;
- acting as a particular student's confidante;
- giving small gifts, money, toys, cards, letters to a student;
- using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a student;
- flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a student.

### Modus operandi of institutional grooming

- Target vulnerable victim - Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs.
- Gain victim's trust – Offenders may allow a student to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the student's parents or the school in order to foster secrecy.
- Gain the trust of others – Institutional offenders are often popular with students and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large.
- Filling a need / becoming more important to the student - This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
- Isolating the student - The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members.



- Sexualising the relationship - This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.
- Maintaining control and secrecy - Offenders may use their professional position to make a student believe that they have no choice but to submit to the offender.

## Signs of grooming for radicalisation

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way. Signs of vulnerability include:

- Underachievement
- Being in possession of extremist literature
- Poverty
- Social exclusion
- Traumatic events
- Global or national events
- Religious conversion
- Change in behaviour
- Extremist influences
- Conflict with family over lifestyle
- Confused identity
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups or faith

## Part D: Specific safeguarding issues

All staff should have an awareness of safeguarding issues some of which are listed below. Further details should be read at Annex A of Keeping students Safe in Education (September 2016). Safeguarding can link to issues such as drug-taking, alcohol abuse, truanting and sexting. Sexting can become an aspect of online safety abuse, between adults/students.

### Female genital mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a student or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present it could signal a risk to the student or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the [Multi-Agency Practice Guidelines](#). Chapter 9 of those Guidelines (pp42-44) focuses on the role of schools. FGM can also link to Honour Based Violence.

Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, he or she has a statutory duty to personally report it to the police. Those failing to report such cases to the police will face disciplinary sanctions. Unless the teacher has good reason not to they should still consider and discuss the case with the DSL and involve students' social care as appropriate. Any other adults with concerns about FGM should report their concerns to the DSL immediately.



## **Student sexual exploitation (CSE)**

CSE is a form of abuse which involves students receiving something in exchange for sexual activity. CSE involves an imbalance of power in the relationship; it can involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. In addition to the behavioural indicators above, key indicators of CSE include appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; and having older boyfriends or girlfriends. Any concerns regarding CSE should be immediately reported to the DSL.

## **Action if a student is missing**

The School needs to be aware of those students who are persistently absent or missing from school as this may be an indicator of welfare concerns, including abuse or neglect. All staff must also be aware of their role to prevent students from going missing from education.

## **Preventing radicalisation and extremism**

It is the School's to have due regard to the need to prevent students from being drawn into terrorism. The referral procedures set out above also apply where there are concerns about students who may be at risk of being drawn into terrorism. The School also has in place a specific Preventing Extremism and Radicalisation Policy which sets out in detail the training requirements, prevention measures and procedures which staff must follow if they have concerns about a student being drawn into terrorism. All staff should familiarise themselves with and follow the procedures set out in this policy.

## **Corporal punishment**

Corporal punishment, or the threat of it, is never permitted in this School.

## **Online safety**

Staff should be aware of the risks from potentially harmful and inappropriate online material..

## **Teaching about safety and safeguarding**

The School takes a proactive approach to teaching students about safety and safeguarding. In addition to PSHE, this is undertaken across the curriculum. As well as explicit teaching opportunities, staff use incidental opportunities to promote safe messages and teach about how to manage risk.

## **Part E: Actions where there are safeguarding concerns or allegations about the conduct of another adult**

The safety and wellbeing of students in our school is dependent on the vigilance of all our staff and their prompt communication to the DSL or DDSL of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to students. Such concerns may arise in relation to any adult. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated. The School is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the school setting.

The notification and prompt handling of all concerns about adults is fundamental to safeguarding students. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.



## Low level concerns

### Aims

The overarching aim of the School's low-level concern policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. This is consistent with 'Working Together to Safeguard students' which states *"Students are best protected when professionals are clear about what is required of them individually and how they need to work together"*. In particular the intention of this policy is to:

- Maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines.
- Ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct.
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst on the other hand protecting staff from false allegations or misunderstandings.

### What is a low-level concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the School's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around students.

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such the School sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

### What should I do if I have one?

Where a low-level concern exists it should be reported to the DSL or DDSL as soon as reasonably possible and in any event within 24 hours of becoming aware of it (where the concern relates to a particular incident).

### How will my low-level concern be handled?

The DSL will discuss all low level concerns s/he receives with the DDSL as soon as possible and in any event within 24 hours of becoming aware of it. The Principal will in the first instance satisfy herself that it is a low-level concern and should not be reclassified as a higher level concern/allegation and dealt with under the appropriate procedure below. The circumstances in which a low-level concern might be reclassified are where (a) the threshold is met for a higher level concern/allegation (b) there is a pattern of low-level concerns which collectively amount to a higher level concern/allegation or (c) there is other information which when taken into account leads to a higher level concern/allegation. Where the Principal is in any doubt whatsoever, advice will be sought from the Board Chair, if necessary on a no-names basis.

Having established that the concern is low-level the DSL or DDSL as appropriate will discuss it



with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

### **What records will be kept?**

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either (a) the concern (or group of concerns) has been reclassified as a higher level concern as above or (b) the concern (or group of concerns) is sufficiently serious to result in formal action under the School's grievance, capability or disciplinary procedure.

### **Higher level concerns and allegations**

When handling allegations, the School will always adhere to the guidance in Keeping students Safe in Education (September 2016).

### **What is a higher level concern or allegation?**

A higher level concern or allegation is any behaviour where an adult is alleged to have:

- (a) behaved in a way that has harmed a student, or may have harmed a student;
- (b) possibly committed a criminal offence against or related to a student; or
- (c) behaved towards a student or students in a way that indicates he or she could pose a risk of harm to students.

A higher level concern or allegation may be triggered by one specific incident or by a pattern of behaviour or low-level concerns which when considered collectively amount to a higher level concern/allegation.

### **What should I do if I have one?**

Higher level concerns or allegations should be reported to the Principal immediately. The adult to whom the concern or allegation (referred to hereafter as allegation) relates should not be informed.

If the allegation is about the Principal, the DDSL will refer this to the Safeguarding Governor (Board Chair).

### **How will higher level concerns or allegations be handled?**

The Principal (or Board Chair in the case of an allegation about the Principal) will contact the Board Chair/Board and conduct a strategy team. The decision of the strategy team could be:

- official investigation by local social services
- police investigation if there is a criminal element

### **Confidentiality and information sharing**

When an allegation is made, the School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a student from the same school (where that identification would identify the teacher as the subject of the allegation).

The legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public”. This means that a parent who, for





example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

The person against whom an allegation is made, and parents or carers of a student or students involved, should normally be informed as soon as possible after the result of the initial investigation is known. However, where a strategy discussion is needed or police or student's social care need to be involved neither the person against whom the allegation has been made, nor the parents, should be informed until these agencies have been consulted.

During the course of the investigation the School in consultation with the local social services will decide what information should be given to parents, staff and other students and how press enquiries are to be dealt with.

When the individual against whom the allegations have been made is spoken to, he/she will be warned that anything said will be recorded. The School will appoint a representative to keep the person informed of the likely course of action and the progress of the case. They should also advise the individual to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice. They will be kept informed of the timescales in accordance with Keeping students safe in Education (September 2016)

### **Circumstances where suspension will be considered**

If there is cause to suspect that a student or students at the school are at risk of harm from the accused person or if the case is so serious that it might be grounds for dismissal then the person concerned may be suspended.

### **Miscellaneous**

#### **Disciplinary, Grievance Procedures**

Where a safeguarding concern or allegation triggers another procedure such as grievance or disciplinary, that procedure shall only be followed once the immediate safeguarding concern or allegation has been fully investigated.

#### **Support for staff**

Where the impact of a serious student protection case, or allegation against an adult working in or linked to the school, has a detrimental effect on staff well-being, the DSL will facilitate access to support and/or counselling if requested.

#### **Parents and students**

If a parent or student has a safeguarding concern, question, doubt or allegation about the conduct an adult, s/he should raise it with the Principal. If a parent or student raises their concern with another member of staff, it will be immediately passed onto the Principal in accordance with this policy.



## Part F: Responsibilities and training

### Designated Safeguarding Lead (DSL)

The DSL takes lead responsibility for safeguarding and student protection in the school. The DSL is also the Principal. The school also has a named DDSL ensuring there is always an appropriately trained and designated person in the school at all times. The responsibilities of the DSL include: managing referrals, working with other professionals and agencies, keeping up to date with relevant training, keeping staff up to date with relevant safeguarding training, maintaining a secure awareness of student protection and safeguarding, maintaining accurate records, transferring records. The DSL and DDSL liaise on safeguarding issues and would refer any cases of suspected abuse to the local authority students' social care and the police. These senior members of staff have the necessary status and authority to take responsibility for safeguarding matters including committing resources and, where appropriate, supporting and directing other staff.

All student protection and safeguarding concerns, discussions and decisions made and the reasons for such decisions are recorded accurately and kept securely in a locked cabinet, if in paper form, in the Director's Office. Records are carefully managed by the DSL.

### Inter-agency working

We are fully committed to inter-agency working in line with statutory guidance. We work with all external agencies in the best interests of the student. We will always adhere to the procedures and practice of the local authority as part of the inter-agency safeguarding procedures. Information will be shared securely with other professionals and local agencies. This commitment includes for students who are in the care of local authority where we recognise additional vulnerability to under-achievement.

### Support for and supervision of staff

All staff should feel comfortable and confident approaching the DSL, DDSL or any other member of senior leadership about any safeguarding and/or pastoral care concerns, including in relation to unsafe practice (see Whistleblowing section below). If a staff member would like additional support and/or training in order to fulfil their safeguarding responsibilities, including in identifying and/or handling concerns they should speak to the DSL who will work with the member of staff to ensure that they are adequately supported. Safeguarding and pastoral care responsibilities are a key part of staff appraisals and staff should use this process to build and improve their knowledge, confidence and experience in this area.

### Training

As part of their induction programme all newly appointed staff, including part-time, temporary and voluntary staff, receive training in safeguarding issues including:

- this Safeguarding and Student Protection Policy;
- Keeping students Safe in Education (September 2016) Part 1 and Annex A for adults working directly with students;
- the School's Code of Conduct;
- the School's Safeguarding: Preventing Extremism and Radicalisation;
- 'What to do if you're worried a student is being abused – advice for practitioners' (2015);
- the role of the DSL.

At induction (and annually thereafter, as minimum) staff are trained on:

- identifying signs of abuse;
- knowing what to do to raise concerns;
- knowing how to make a referral (including if the DSL is not available or the DSL is not acting); and
- recognising the need for early help.



Staff should re-read KCSIE each time it is updated by the DfE, and are told of updates by the DSL and DDSL. Staff are expected to sign to note they have read and understood the content of KCSIE Part 1. Refresher training for staff is provided regularly. All staff are provided with safeguarding and student protection updates annually, as minimum. The DSL leads on ensuring that regular safeguarding and student protection updates are circulated to all staff.

The DSL and DDSL receive advanced safeguarding and student protection training at least annually. This includes inter-agency working protocols, KCSIE and the student protection procedures and training in preventing extremism.

## Part G: Proprietorial oversight

Branislava Keserovic, PhD is the Board Chair responsible for the School.

The Board Chair meets regularly with the DSL and the DDSL to audit safeguarding procedures and practice.

## Part H: Other safeguarding policies

### Code of Conduct

### Safer Recruitment Policy

### Single Central Register Policy

Our school prioritises embedding a culture of safe recruitment as part of our strategy for preventing harm to students (see Safer Recruitment Policy). Statutory procedures for checking the suitability of staff and volunteers who work with students are always followed, including checking their identity, mental and physical fitness, right to work in Serbia, verifying professional qualifications as appropriate, overseas background checks as appropriate, prohibition from teaching and/or management of an independent school checks, detailed references and interview information. All such recruitment checks are recorded on the School's MIS and all applicants show their original certificates to the School before they take up the post or as soon as practicable afterwards and in which case, the School will ensure a separate barred list check has been undertaken in advance. A Risk Assessment will be in place, approved by the Principal, until full DBS clearance is received. This will fully detail reasons and the supervision in place to mitigate any risks. This will be reviewed fortnightly.

The School adheres to the definition of supervision as “reasonable day to day supervision by another person engaging in regulated activity” and follows Annex F of Keeping Students Safe in Education (September 2016) accordingly. Importantly, the following points are adhered to:

- there must be supervision by a person who is in regulated activity
- the supervision must be regular and day to day; and
- the supervision must be ‘reasonable’ in all the circumstances to ensure the protection of students.

### Review of policy and procedures

The School carries out an annual review of this Policy, led by the DSL. This includes an evaluation of the extent to which these policies have been effectively implemented throughout the school. The School will remedy any deficiencies or weaknesses in student protection arrangements without delay and without waiting for the next policy review date, should any be necessary.



## Appendices for safeguarding policy

These appendices accompany the Safeguarding Policy and cover the following three areas:

- Appendix A - Peer on Peer Abuse
- Appendix B - Youth Produced Sexual Imagery(Sexting)
- Appendix C - Online Safety

## Appendix A – peer on peer abuse

All staff should be alert to the risk of peer on peer abuse and understand their role in preventing, identifying and responding to it. Staff should know that students are capable of abusing their peers, they should never dismiss abusive behaviour as a normal part of growing up, or ‘banter’, and should not develop high thresholds before taking action. Peer on peer abuse should be taken as seriously as abuse by adults.

### What is peer on peer abuse?

For these purposes, peer on peer abuse is any form of abuse perpetrated by a student towards another student. It can take many different forms including, but not limited to, serious bullying (including cyber-bullying), relationship abuse, domestic violence, student sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and gender-based violence.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while students who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

Youth produced sexual imagery can but does not always constitute abusive behaviour. All incidents involving youth produced sexual imagery should be responded to with reference to the School's Youth Produced Sexual Imagery Policy (see Appendix B) and in accordance with the School's Safeguarding Policy.

### What role does gender play?

Peer on peer abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

### When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low level bullying (where the School's anti-bullying policy should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include (a) where it is repeated over time and/or where the perpetrator intended to cause serious harm: (b) where there is an element of coercion or pre planning; and (c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive and staff should always use their professional judgment and discuss any concerns with the DSL.

### How can I identify victims of peer on peer abuse?

By being alert to student's well-being and to signs of abuse. Signs that a student may be suffering from peer on peer abuse overlap with those relating to other types of abuse (please see section C of the Safeguarding Policy for indicators of abuse) and include (a) failing to attend school, disengaging from classes or



struggling to carry out school related tasks to the standard you would ordinarily expect; (b) physical injuries; (c) having difficulties with mental health and/or emotional wellbeing; (d) becoming withdrawn, shy, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much; (e) drugs and/or alcohol use; (f) changes in appearance and/or starting to act in a way that is not appropriate for the student's age. Again, this list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

### **Are some students particularly vulnerable to abusing or being abused by their peers?**

Any student can be affected by peer on peer abuse and staff should be alert to signs of such abuse amongst all students. Research suggests that (a) peer on peer abuse is more prevalent amongst students aged 10 and older although it also affects younger students, including by way of harmful sexual behaviour; (b) students who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives.

### **How prevalent is peer on peer abuse?**

Recent research suggests that peer on peer abuse is one of the most common forms of abuse affecting students in the UK. For example, more than four in ten teenage schoolgirls aged between 13 and 17 in England have experienced sexual coercion (Barter *et al.*, 2015). Two thirds of contact sexual abuse experienced by students aged 17 or under was perpetrated by someone who was also aged 17 or under (Radford *et al.*, 2011) and over a third of young boys in England admitted to watching porn and having negative attitudes towards women (University of Bristol and University of Central Lancashire, 2015).

### **What should I do if I suspect either that a student may be being abused, or that a student may be abusing others?**

If a member of staff thinks for whatever reason that a student may be at risk of abuse from another student or young person, or that a student may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with Section B of the Safeguarding Policy. If a student is in immediate danger, or at risk of harm, a referral to students' social services and/or the police should be made immediately (see Section B of the Safeguarding Policy).

### **How will the DSL respond to concerns of peer on peer abuse?**

The DSL will discuss the behaviour with the member of staff and will where necessary take any immediate steps to ensure the safety of the victim(s) or any other student.

Where the DSL considers or suspects that the behaviour might constitute abuse students' social services should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with student's social services and agree on a course of action, which may include

(a) taking any steps to ensure the safety and wellbeing of any students affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), a specialist harmful sexual behaviour team and/or youth offending services; and (d) a strategy meeting.

Any response should be decided in conjunction with student's social services and any relevant agencies:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other students;
- consider that the abuse may indicate wider safeguarding concerns for any of the students involved;
- treat all students (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other students, s/he may also have considerable unmet



needs and be at risk of harm themselves;

- take into account the complexity of peer on peer abuse and of students' experiences and consider the interplay between power, choice and consent. While students may appear to be making choices, if those choices are limited they are not consenting;
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other students, their own unmet needs, the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other students in the School. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other students in the School;
- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in the Safeguarding Policy (including where the student is in need of early help or statutory intervention); (e) monitoring the student's wellbeing closely and ensuring that s/he receives on-going support from all relevant staff members within the School; (f) engaging with the student's parents and any external agencies to ensure that the student's needs are met in the long-term;
- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

### **How does the School raise awareness of and reduce the risk of peer on peer abuse?**

- The School actively seeks to prevent all forms of peer on peer abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of peer on peer abuse and any cases of bullying (no matter how trivial) promptly and appropriately.
- Students are educated about the nature and prevalence of peer on peer abuse via PSHE, they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of bullying and peer on peer abuse.
- Staff are trained on the nature, prevalence and effect of peer on peer abuse, how to prevent, identify and respond to it.

### **Appendix B – Youth Produced Sexual Imagery**

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.' Yet, recent NSPCC research has revealed that when students are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know. Similarly, a recent Student Line survey has revealed that many parents think of sexting as flirty or sexual text messages rather than images.



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

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

## What is youth produced sexual imagery?

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

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

## What types of incidents are covered by this policy?

**Yes:**

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

**No:**

- The sharing of sexual imagery of students by adults as this constitutes student sexual abuse and schools should always inform the police.
- Students sharing adult pornography or exchanging sexual texts which do not contain imagery.
- Sexual imagery downloaded from the internet by a student.
- Sexual imagery downloaded from the internet by a student and shared with a peer (also under the age of 18) or an adult.

## Disclosure

Disclosure about youth produced sexual imagery can happen in a variety of ways. The student affected may inform a class teacher, the DSL in School, or any member of the School staff. They may report through an existing reporting structure, or a friend or parent may inform someone in School or colleague, or inform the police directly.

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. This will be covered within staff training and within the School's Safeguarding Policy.

Any direct disclosure by a student should be taken very seriously. A student who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in School is a last resort and they may have already tried to resolve the issue themselves.

## Handling incidents

All incidents involving youth produced sexual imagery should be responded to in line with the School's Safeguarding Policy.



# BRITISH INTERNATIONAL SCHOOL

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When an incident involving youth produced sexual imagery comes to a member of staff's attention:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate School staff.
- The DSL will follow the procedures and guidance set out in '*Sexting in schools and colleges: responding to incidents and safeguarding young people*'.
- There should be subsequent interviews with the students involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the student at risk of harm.
- At any point in the process if there is a concern a student has been harmed or is at risk of harm a referral should be made to student's social care and/or the police immediately.

## Education

Teaching about safeguarding issues in the classroom can prevent harm by providing students with skills, attributes and knowledge to help them navigate risks. The School will provide students with opportunities to learn about the issue of youth produced sexual imagery, as part of its commitment to ensure that they are taught about safeguarding, including online, through teaching and learning opportunities – as also referred to in the School's Online Safety Policy at Appendix C.

## Appendix C - Online Safety

All staff should be aware of the risks posed to students by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use. This Policy should be read alongside the School's E-Safety Policy and which sets out the School's approach to online safety in further detail, as well as the School's Youth Produced Sexual Imagery Policy (see Appendix B)

The School has adopted a whole school approach to online safety which (a) captures the range and complexity of the risks and of student's experiences of those risks; (b) seeks to mitigate those risks as far as possible without depriving students of the significant benefits provided by technology and the internet; and

(c) handles all cases of online harm appropriately and with sensitivity.

### What are the risks?

The risks posed to students by the internet and technology are wide-ranging and include risks resulting from:

#### *Content - being exposed to harmful material*

This includes but is not limited to (a) violent pornography or sexual images of students which affect a student's perception of girls, love and relationships; (b) material promoting harmful behaviours such as self-harm or eating disorders; (c) propaganda or material promoting extremism, radicalisation and/or terrorism; (d) material showing or depicting extreme violence or brutality; and (e) social media such as Facebook and Instagram which can provide students with distorted and unrealistic images of others' lives, causing some students to feel inadequate or distressed about their own lives.

#### *Contact - being subjected to harmful interaction with others online*

This includes but is not limited to (a) cyber-bullying; and (b) contact from individuals seeking to groom students for the purposes of sexual abuse or radicalisation.



*Conduct - personal online behaviour that increases the likelihood of or causes of harm*

This includes but is not limited to (a) responding to and engaging with individuals seeking to groom or abuse students; (b) youth produced sexual imagery.

Online harm can be caused via a number of different media, including but not limited to: mobile phones and apps; social media; the internet; and video games.

### **How can I identify a student who may be at risk of online harm?**

Any student may suffer from online harm and all staff should be alert to the risk of it. Indicators that a student may be being abused or harmed online overlap with other indicators of abuse which can be found at Section C of the Safeguarding Policy. For further indicators that a student may be suffering from online harm, please see <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/online-abuse/signs-symptoms-effects/>.

### **What should I do if I suspect that a student may be at risk of or suffering from online harm?**

Follow the procedure set out at Section B of the Safeguarding Policy and discuss any concerns with the DSL immediately. The DSL will discuss the incident with you and agree on a course of action in accordance with the safeguarding procedures set out in the Safeguarding policy.

### **What preventative measures is the School taking?**

Students are educated about the risk of online harm – including youth produced sexual imagery, and the ways to mitigate those risks in PSHE, computing classes, assemblies and tutor groups.

Staff are trained on the risks posed by technology and the internet and the ways in which they can prevent, identify and respond to cases appropriately and with sensitivity to cases of online harm.

The School actively engages with parents to ensure a joined up approach when responding to cases of harm, and to ensure as far as possible that parents are aware of and understand the risks of it, are able to identify and respond appropriately to cases of online harm.

The School takes measures to limit student's exposure to these risks from the school's IT systems, including by putting in place appropriate filters and monitoring systems which protect students from harm whilst not over-blocking.

### **Information sharing**

The School recognise the fundamental importance of information sharing in protecting students from harm and promoting student's wellbeing. The importance of information sharing between agencies is highlighted in a number of serious case reviews which demonstrate that where information is not shared, concerning patterns of behaviour are often missed and students often do not receive the support they need.

The DSL is trained on the above guidance and works with staff to ensure that (a) fears about sharing information do not stand in the way of the need to promote the welfare and protect the safety of students; (b) they understand and follow this guidance; and (c) they feel confident about the ways in which they share information, including with parents, other staff, and external professionals and agencies.