

Commitment to Learning
High Expectations
All Can Succeed
Confidence and courage
Everyone valued equally

SAFEGUARDING, CHILD PROTECTION AND CONFIDENTIALITY POLICY

Designated Safeguarding Lead = Mr Pritam Vekaria
Designated Safeguarding Team = Tanya Douglas, Fabrice Baurain-Levi, Alex
Christodoulou, Greg Mathews and Karen Barnham
Desinganted Child Protection Governor – Tracey Jenkins

Principles

- In accordance with The Children Act 2004 and previous legislation the school's paramount concern is that every child is healthy, safe, enjoying and achieving, participating fully in school, by making a positive contribution to school and the community, and achieving economic well-being.
- All Chace staff and governors are committed to keeping children and young people safe and take appropriate action to make sure that they are safe both at home and at school:
 - by establishing and maintaining an environment where children feel secure, are encouraged to talk, and are listened to;
 - by seeking to provide a safe environment that is conducive to learning;
 - by identifying children and young people who are suffering or likely to suffer significant harm; particularly the most vulnerable (SEN/LAC/EHCP).
 - by ensuring children know that there are adults in the school they can approach if they are worried;
 - by providing opportunities in the Life Skills (PSHE) curriculum for children to develop the skills they need to recognise and stay safe from abuse.
 - At Chace we have **Early Help** signposts around the school building, this includes wall displays, assemblies, planner and Pastoral team using bespoke Early Help support. Such as Change and Challenge, mentoring, group work and working alongside SAFE & CAMHS.
- The school respects the basic needs and rights of children and has an expectation that parent(s)/carer(s) respect these rights also. We recognise that all matters relating to Child Protection are confidential and are only shared with members of staff on a need-to-know basis.

The school works within the framework of the London Child Protection procedures (Fifth edition updated March 2017) and the Enfield Safeguarding Children Board (<http://www.enfieldscb.org/>) policies and procedures. The school adheres to, and actively promotes, statutory safeguarding guidance outlined in 'Keeping children safe in education: Statutory guidance for schools and colleges' September 2018.

- The school operates safe recruitment procedures including:
 - All staff, volunteers/visitors and Governors in Regulated Activity, are subjected to a Disclosure and Barring Enhanced Clearance check (DBS) before starting work in line with teacher prohibition orders and section 128 directions under 'Keeping children safe in education' September 2018.
 - All teaching staff are checked to ensure they are not subject to a prohibition order or an interim prohibition order prior to them undertaking any work (This is a requirement of the School Staffing (England) (Amendment) Regulations 2015.
 - All Agencies supplying agency staff must complete a rigorous questionnaire on safeguarding to ensure that they adopt robust recruitment and vetting of workers for

deployment within the school. In addition, all agency staff are checked using the prohibition list.

- All teaching qualifications are checked prior to starting work
 - A Single Central Record of all staff, volunteers/visitors and agency staff in Regulated Activity is kept in accordance with government guidance, thereby ensuring that all appropriate checks are carried out on staff and volunteers who work with children in accordance with guidance contained in 'Keeping children safe in education' September 2018.
 - Ensuring 'Safer Recruitment' training is provided for relevant staff/governors involved in recruitment.
- In line with guidance contained in 'Keeping children safe in education' September 2018, the senior Designated Safeguarding Lead (DSL) is the Deputy Headteacher who advises the Full Governing Body. Additionally the school has a trained team of DSLs who consult regularly and work closely to ensure that all teaching and support staff are aware of child protection procedures and that consistency of practice is maintained (refer to Staff Handbook). The DSLs have termly core safeguarding meetings to discuss serious case reviews both at Chace and nationally. Further training updates are at least every 2 years, with specific training from Enfield's PREVENT key worker to ensure best practice is being followed under Government's anti-radicalisation strategy, Prevent.
 - All Chace staff receive regular Child Protection training (at least each half term) equating to a whole days training every three years with on-going refresher training for designated staff every two years. Regular training includes procedures for dealing with concerns, signs of abuse, findings of serious case reviews, promoting and monitoring e safety, FGM and preventing radicalisation. All new staff receive Child Protection training as part of their induction and all student teachers are trained in Child Protection within their Professional Studies. Professional clinical supervision is provided for those staff who work with students in need individually or in group work situations. In stressful cases the school offers support via supervision or line management.
 - **Complete confidentiality cannot and should never be promised to the child in cases of risk/suspicion of harm.** Instead it is explained that the information disclosed may need to be shared with other professionals to help keep the child, and perhaps other children, safe.
 - It is the school's usual practice whenever possible to work closely with parents on issues concerning the welfare of their children. This is referred to in the Chace Home-School Agreement which is signed by parents of all students when they join the school.
 - We actively seek to empower children to talk to their parents/carers about sensitive/difficult issues. Following 'Fraser guidelines', the school understands that if a teenage child is judged to be capable of understanding the decision s/he is making and capable of understanding the likely consequences of making that decision, then information is usually only disclosed to a parent with the child's consent, regardless of parental responsibility. However, our practice is informed by the Sexual Offences Act (2003) that "children 13 years old and under are considered to be of insufficient age to give consent to sexual activity". Nevertheless, if the child is considered to be at risk the needs of the child supersede confidentiality.
 - Except in cases of significant risk to the child, the school may seek hypothetical advice on a what if basis from relevant professionals in making internal assessments (e.g. suspected failure to thrive) prior to formal referral.

- In the vast majority of cases, the school will consult with the parent/carer prior to making a referral to LA children's social care through the Single Point of Entry (SPOE) team unless seeking agreement is likely to place the child at risk of significant harm. The school takes this stance under the Children Act 1989 and 2004, **judging the child's welfare to be the paramount consideration**. In accordance with London Child Protection Procedures, where a professional decides not to seek parental permission before making a referral to children's social care, the decision is recorded in the child's file with reasons, dated and signed and confirmed in the referral to LA children's social care. Where the parent refuses to give permission for the referral, unless it would cause undue delay, further advice should be sought from a manager and the outcome fully recorded.

Allegations against Staff

We understand that a pupil may make an allegation against a member of staff and volunteers. If such an allegation is made, the member of staff or volunteer receiving the allegation will immediately inform the Headteacher. The Headteacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO). In Enfield, the role of the LADO is undertaken by the Deputy Head of Safeguarding and Quality Service (SQS), Maria Anastasi. Email: maria.anastasi@enfield.gov.uk 02083792746

If the allegation made to a member of staff concerns the Headteacher, the staff member will immediately inform the Chair of Governors (see contact details above) who will consult with the Enfield's Lead Officer for Safeguarding and Child Protection.

The school will follow the All London Child Protection Procedures for managing allegations against staff.

- All concerns are referred are referred directly to the Local Authority Designated Officer (in Enfield LADO; Maria Anastasia 02083792746). LADO recommendations should be followed, with support for both pupil and staff or volunteer throughout the process considered and discussed. Suspension should be considered as a last resort to safeguard students, maintain confidentiality and to ensure a fair investigation. In addition, records must be kept, and any resignation and settlement/compromise agreements should be in writing and signed copies kept. This however does not prevent the allegation being followed up and reference to the DBS criteria met in full.
- We have a clear Code of Practice that staff understand and agree to. The Code of Practice offers guidance to staff on the way they should behave when working with children.
- Our policy on physical intervention by staff is set out in separate policies (ref. Health & Safety Policy and Chace Code of Safe Practice) and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimum force necessary to prevent injury to the child or to another person.
- Our Health & Safety Policy reflects the consideration we give to the protection of Chace children both within the school environment and away from the school when undertaking school trips and visits.

The use of 'reasonable force'

At Chace we do not promote the use of force and train staff to use de-escalation techniques. The decision on whether to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances. If any member of staff or visitor has had to use force to control or restrain they must see Headteacher and complete the use of force/restraint form that must be returned to the Headteacher the same day.

When using reasonable force in response to risks presented by incidents involving children with SEN, disabilities or medical conditions, you should, in considering the risks:

- Carefully recognise the additional vulnerability of these groups
- Consider your duties under the Equality Act 2010

The staff handbook makes our stance on this clear, and any restraint or reasonable force used; the Headteacher must be notified immediately with clear specific details.

- The Lettings Agreement “Conditions for the use of educational premises outside normal teaching hours”, issued by School Hire & Functions Ltd includes a section on Safeguarding and Child Protection.
- A statement in the school brochure informs parents and carers about our school’s duties and responsibilities under child protection procedures. Parents can obtain a copy of the school child protection policy on request.
- The names of designated members of Chace staff carrying out child protection responsibilities for the current year are displayed in reception, the staff room and offices around the school. A Safeguarding booklet is also handed out to all visitors with key information and who to contact if they have any safeguarding concerns. Designated Safeguarding Lead - Mr Pritam Vekaria. Designated Safeguarding Team - Tanya Douglas, Fabrice Baurain-Levi, Alex Christodoulou, Greg Mathews and Karen Barnham. Designated Child Protection Governor – Tracey Jenkins
- Visitors to Chace are expected to sign in at reception and, where necessary, be given a named visitor’s badge. Visitors who have not been DBS cleared are asked to wait for the relevant member of staff to meet them and they remain with them at all times. Staff must complete a “Visitors to Chace” form¹ in advance of the visit.

Mobile Phone/Electronic Device Use

- Staff Code of Conduct, CP policy makes the expectations around electronic device use at Chace clear. All Staff who have a phone/tablet/electronic device with camera or video recording function are trained and made aware that they must not take any images or videos of pupils with their personal devices, both on or off school site. They must use school equipment at all times.

Policy into Practice

- A member of staff who has **any** concerns about the physical and/or social and/or emotional well-being or “appearance” of a child or to whom a disclosure has been made completes the Chace Child Protection (CP) referral form².

¹ Appendix 1

² Appendix 2 and 3

- All staff are trained to ensure they understand the difference between a concern that the pupil is at risk of immediate danger or the pupil is at risk of significant harm. If staff have any concerns about a child they must complete a green CP form and hand to a designated member of the CP team as soon as physically possible. If a pupil is in immediate danger or at risk of harm, a referral should be made to Children's Social care/and or the Police immediately. All staff are able to make referrals to Social Care, however if they do so they must make the CP lead aware as soon as possible after the phone call, if this action is taken.
- Specific guidance on the following issues: Child Sexual Exploitation, Female Genital Mutilation, Forced Marriage, Peer on Peer Abuse, Prevent and sexting is also set out in this policy³ and staff are trained on these specific issues as part of regular Child Protection training.
- Disclosures may occur at any place or time, but especially if a trusting relationship is built between the adult and student. **Staff are legally and professionally bound to pass on child protection issues (both disclosures and suspicions) to the designated teacher immediately.**
- When such information is passed to a CP designated teacher s/he will usually seek clarification/background details from the relevant Head of Learning and any other key staff. The child may be asked to provide further details, if appropriate, but **must not be interviewed formally.** This is also the case where an allegation is made. Formal interviews should not be carried out until a decision has been taken about whether the incident needs to be investigated by the police.
- Where relevant, appropriate information is sought from internal or external agencies, as necessary (for example School Nurse, Educational Psychologist, Safer Schools Officers, Youth Offending Service - YOS). An Early Help Assessment Form is completed. This is emailed to the SPOE. If the referring member of staff is in doubt about the referral or seeks clarification, they can call the SPOE on 02083795555.
- We are determined to ensure the online safety⁴ of our students. If there are concerns that a child's safety is at risk because it is suspected that someone is using communication technologies (such as social networking sites) to make inappropriate contact with the child the school will contact parents; advise the child on how to terminate the communication and save all evidence; contact CEOP <http://www.ceop.gov.uk/> and inform the LA e-safety officer. The school will also consider the involvement of police and children's social care. Children should be given confidence in a no-blame culture when it comes to reporting inappropriate incidents involving the internet or mobile technology.
- In concerns relating to sexual health, factual information may be provided to young people (including those who are under 16) about different types of contraception; emergency contraception and its availability; and about sexually transmitted infections and where treatment is available. However, **offering advice or attempting diagnosis from described symptoms is not appropriate.** The Headteacher and Welfare Officer are informed in all cases of pregnancy.
- In the event of any CP disclosure/concern and following consultation amongst the school's CP team, including the Headteacher, a decision will be made to: raise general

³ Appendix 6

⁴ Appendix 7

concerns with parents/carers; monitor the situation further; or proceed to formal referral to social care through the SPOE if it is deemed that the child is at risk of “significant harm” or there are safeguarding issues⁵.

- The formal referral is made the same day by CP designated staff by telephone or encrypted email using the relevant LA proforma, following specified London procedures. In the event of an incident at the end of the school day, a referral to children’s social care is made in the same way, recognising that the school does not have the right to keep the student past the end of the school day. Where necessary, the police are informed of the basis of evidence for concern about the child returning home that evening and advice sought about steps to take. As necessary, LA Legal services are contacted for advice.
- A case file is opened for any child about whom concerns are raised and all relevant documents are stored within a locked CP filing cabinet in the school. The file is reviewed and updated regularly by the CP designated team which meets each half-term. Child Protection documents are forwarded as appropriate if a child transfers to a new school and requests made to previous schools when a child transfers to Chace.
- The Attendance Officer and Pastoral team work closely to monitor attendance daily. Any concerns trigger contact with home on the day unless absence is authorised or has been communicated to the attendance team to meet best practice in section 175 of the Education Act 2002. In the most serious cases where children are missing from education the Attendance Manager will work with DSL, external agencies and Pastoral team to ensure the student has early help and support once they have returned back to school and these students will then closely monitored with any early concerns communicated to all relevant persons and agencies. In addition to missing in education, the following students are monitored closely. Those on CP plans or CIN, Gypsy/Traveller families, Armed forces, children supervised by Youth Justice System, LAC, children with EHCP and those who cease to attend school (home educate).
- Where alternative provision is used to meet students’ needs, including Managed Moves, attendance is recorded, and information shared with the education provider to ensure attendance is monitored and accounted for.
- LAC & Care Leavers are monitored by the Attendance Manager to ensure the pupils are making expected progress and any issues picked quickly so early help and support can be utilised. The Attendance Manager liaises with external agencies and carers and ensures the Pastoral team in school are aware of support and changes in the circumstances including legal status and parental responsibility arrangements.

Follow Up

- The school works closely with other agencies during the initial investigation once a formal referral has been made to children’s social care.
- If a child is subject to a CP Plan the Child Protection designated teacher or the Head of Learning directly involved attends CP conferences and strategy meetings as required.

Procedure for sharing CP information within Chace

When a Child Protection concern has been addressed, the green record of the concern, actions and outcomes is circulated to all members of the CP team and the Headteacher in a

⁵ Appendix 4

windowless plain envelope, labelled only with the name and date of birth of the student. Once the final person on the circulation list has read the documents, it is returned to Karen Barnham, for filing in Child Protection records.

Beyond the CP team, information can be shared on a need-to-know basis with the student's Head of Learning and in some circumstances, other adults such as the student's form tutor. In accordance with 'Information Sharing: Guidance for practitioners and managers' (DCSF, 2009), information is only shared with colleagues where there is a clear and legitimate purpose and we can be confident that the information will remain confidential.

Procedure for sharing CP information with other schools and organisations

There is a duty for schools to transfer a copy of any child protection file to any new school or educational establishment that the student joins. This applies even if the case is closed. The file should be transferred from designated teacher to designated teacher. When students join Chace, we send a written request to their previous school or college for them to forward any Child Protection information by secure means, or to confirm that there are no records relating to that student⁶.

When a request for information is received, following a student moving to another educational establishment, we ensure that any CP information is transferred by secure means. Photocopies are made of each of the documents in the CP file and this information is kept on file indefinitely.

Monitoring and Review

This policy supports and should be read in conjunction with the school's Equalities Policy; Health and Safety Policy; Positive Behaviour Policy; Whistleblowing Policy; E-Safety Policy and Lettings Agreement. It is reviewed regularly by Child Protection designated staff, SLT and Governors, with all referrals and open cases reported termly in the Headteacher's report.

⁶ Appendix 5

Appendix 1

Visitors to Chace (side 1)

(Details required for List 99 check)

Forename		Any previous names		Address and Tel:
Surname		Date of birth		

Risk assessed as: (See reverse for guidance)	High:	Medium:	Low:
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Details of Visit

Date/time of visit	
Purpose of visit	
Other information (include company, organisation)	
Member of staff responsible	

Circulate to:

SW → AS (for List 99 check) → NS (for diary) → Reception (for ID) → AS (for filing).

Office use (date done):

List 99:		Diary:		ID:		Filed:	
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Ref. 25

Visitor Risk Assessment (side 2)

The member of staff organising the visit is responsible for ensuring that the visit is assessed for risk using this guide, and that the prescribed action is taken. You may also refer to the *Visitors to Chace: Risk Assessment Procedure*, held by Personnel. Visitors requiring a List 99 must have their photographic identity checked at reception.

Level of Risk →	High <i>(Visitor will be alone with pupils, e.g. teaching classes.)</i>	Medium <i>(Visitor will be with pupils, but accompanied by member of staff, e.g. observing lessons.)</i>	Low <i>(No planned contact with pupils, e.g. meeting with staff.)</i>
Required action ↓			
CRB check. (Personnel need at least 6 weeks advance notice.)	•		
List 99 check. (Personnel need at least 2 days notice.)	•	•	
Signed in/out at Reception. Issued with ID.	•	•	•
Register taken (for groups).		•	•
Supervised by staff at all times.		•	

Appendix 2

DEALING WITH DISCLOSURES: GUIDANCE FOR ALL STAFF

Reminder of shared objectives

All Chace staff share the objective of keeping children and young people safe:

- by seeking to provide a safe environment that is conducive to learning; and
- by identifying children and young people who are suffering or likely to suffer significant harm;

and take appropriate action to make sure that they are safe both at home and at school.

- Make it clear from the start that you are unable to maintain confidentiality about the things the child tells you and that you have no choice but to pass on any information that causes concern.
- Reassure.
- Find a quiet place to talk where you will not be interrupted.
- Listen but do not pressurise.
- Ascertain the facts – who? what? where? when? how? Do not ask leading questions. Such questions may invalidate your evidence (and the child's) in any later prosecution in court. Instead ask open questions like "Anything else to tell me?" or "and".
- Be objective in your recording; state facts, write down exactly what was said to you and anything you may have observed. Distinguish clearly between fact and opinion and refrain from using your own interpretation and assumptions.
- Draw a diagram to indicate the position of any marks/bruising if applicable.
- Let the child know you are pleased to have been told.
- Tell the child you believe them.
- Tell the child you will have to involve others to ensure the child's safety in the future. Tell the child who needs to be involved and why.
- Offer ongoing support and that you will do your best to protect the child.
- Follow the school's internal policy regarding communication in relation to Child Protection and promptly complete and pass on the school's CP concern form.
- Follow the pan-London Child Protection procedure.
- Having dealt with suspected Child Protection concerns which can be distressing, it is often helpful to talk to a colleague such as a Child Protection designated teacher about your feelings.

Action subsequently taken, when and by whom:

Action taken	When; by whom	Outcome

CATEGORIES OF ABUSE FOR REGISTRATION

NEGLECT

- failure to protect a child from exposure to any kind of danger – resulting in significant impairment of the child’s health or development including non-organic failure to thrive.

PHYSICAL INJURY

- Actual or likely physical injury to a child, or failure to prevent physical injury (or suffering) to a child including deliberate poisoning, suffocation and Munchausen’s syndrome by proxy.

SEXUAL ABUSE

- Actual or likely sexual exploitation of a child or adolescent.

EMOTIONAL ABUSE

- Actual or likely severe adverse effect on the emotional and behavioural development of a child by persistent or severe emotional ill-treatment or rejection. All abuse involves some emotional ill-treatment. This category should be used where it is the main or sole form of abuse.

SIGNS OF PHYSICAL ABUSE

- Unexplained injuries or burns, particularly if they are recurrent.
- Improbable excuses given to explain injuries.
- Refusal to discuss injuries.
- Untreated injuries.
- Admission of punishment which appears excessive.
- Bald patches.
- Withdrawal from physical contact.
- Arms and legs covered in hot weather.
- Fear of returning home.
- Fear of medical help.
- Self-destructive tendencies.
- Aggression towards others.
- Running away.

SIGNS OF SEXUAL ABUSE

- Sudden changes in behaviour or school performance.
- Displays of affection in a sexual way inappropriate to age.
- Tendency to cling or need constant reassurance.
- Tendency to cry easily.
- Regression to younger behaviour, such as thumb-sucking, playing with discarded toys, acting like a baby.
- Complaints of genital itching or pain.
- Distrust of a familiar adult, or anxiety about being left with a relative, baby-sitter or lodger.
- Unexplained gifts or money.
- Depression and withdrawal.

SIGNS OF NEGLECT

- Constant hunger.
- Poor personal hygiene.
- Constant tiredness.
- Poor state of clothing.
- Emaciation.
- Frequent lateness or non-attendance.
- Untreated medical problems.
- Destructive tendencies.
- Low self esteem.
- Neurotic behaviour.
- No social relationships.
- Running away.
- Compulsive stealing or scavenging.

SIGNS OF EMOTIONAL ABUSE

- Physical, mental and emotional development lags.
- Admission of punishment which appears excessive.
- Over-reaction to mistakes.
- Continual self-depreciation.
- Sudden speech disorders.
- Fear of new situations.
- Inappropriate emotional responses to painful situations.
- Neurotic behaviour (for example, rocking, hair-twisting, thumb-sucking).
- Self mutilation.
- Fear of parents being contacted.
- Extremes of passivity or aggression.
- Drug/solvent abuse.
- Running away.
- Compulsive stealing or scavenging.

Appendix 5

Letter requesting information from a previous school or educational establishment

Dear

Request for Child Protection Records/Records of concern

Name of student:

Date of birth:

[Name] joined Chace on [Date]. If you have any Child Protection records relating to [Name], I should be grateful if you would forward them to me by a secure method, in accordance with Child Protection Procedures, as soon as possible.

If you have any particular concerns or information which would help us to provide appropriate support for [Name], I would be happy to discuss these. I can be contacted through the school switchboard on 020 8363 7321. If I am not available, please ask to speak to my colleague, Karen Barnham (also a Child Protection Officer.)

If you do not hold any file relating to [Name], I should be grateful if you would confirm this in writing or by emailing chace@chace.enfield.school.uk.

Thanks you for your assistance.

Yours faithfully

Lead for Child Protection

Appendix 6

Specific guidance on Child Sexual Exploitation, Female Genital Mutilation, Prevent, Forced Marriage, Peer on Peer Abuse & Peer on Peer Abuse: Sexting

Child Sexual Exploitation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Possible signs of child exploitation include:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation; children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant; children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education or don't take part in education.

Appropriate action, recording, referring and support will be put in place in line with the usual safeguarding procedures.

Female Genital Mutilation

FGM is child abuse and a form of violence against women and girls, and therefore it is dealt with as part of existing child and adult safeguarding/protection structures, policies and procedures. It is illegal in the UK to subject a child to female genital mutilation (FGM) or to take a child abroad to undergo the procedure – Female Genital Mutilation Act 2003 and Serious Crime Act 2015. Despite the harm it causes, FGM practising communities consider it normal to protect their cultural identity. The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood. The average age is 10 to 12 years. Any female child born to a woman or has a sister who has been subjected to FGM will be considered to be at risk, as much as other female children in the extended family. Any information or concern that a child is at risk of FGM will result in a child protection referral to Children's Social Care.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

The School is alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Signs FGM may be **imminent** include:

- it may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin;
- a professional may hear reference to FGM in conversation, for example a girl may tell other children about it;
- a girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman';
- a girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk;
- parents seeking to withdraw their children from learning about FGM.

There are a number of indications that a girl or woman **has already been subjected to FGM**:

- a girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable;
- a girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating;
- a girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- a girl or woman may have frequent urinary, menstrual or stomach problems; there may be prolonged or repeated absences from school or college;
- a prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
- a girl or woman may be particularly reluctant to undergo normal medical examinations; a girl or woman may confide in a professional;
- a girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear;
- a girl may talk about pain or discomfort between her legs.

Where staff have a concern, the School will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. In line with Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), the School and its staff will fulfill the **statutory duty** to report to the police and SPOE where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Appropriate action, recording, referring and support will be put in place in line with the usual safeguarding procedures.

The Prevent Duty

The school recognises its duty to protect our students from indoctrination into any form of extreme ideology which may lead to the harm of self or others and to carry out the Prevent Duty. This is particularly important because of the open access to electronic information through the internet. The schools aims to safeguard young people through educating them on the appropriate use of social media and the dangers of downloading and sharing inappropriate material which is illegal under section 26 of the Counter-Terrorism Act 2015 (the CTSA 2015).

The school vets all visitors carefully and will take firm action if any individual or group is perceived to be attempting to influence members of our school community, either physically or electronically. Our definition of radical or extreme ideology is 'a set of ideas which could justify vilification or violence against individuals, groups or self.' Staff are trained to be vigilant in spotting signs of extremist view and behaviours and to always report anything which may suggest a student is expressing opinions which may cause concern. Our core mission of diversity permeates all we do. We place a strong emphasis on the common values that all communities share such as self-respect, tolerance and the sanctity of life. We work hard to broaden our students' experience, to prepare them for life and work in contemporary Britain. We teach them to respect and value the diversity around them as well as understanding how to make safe, well-considered decisions. Concerns around any potential activities or signs of radicalisation are referred in the same way as all Safeguarding concerns, and the school is committed to working with the PREVENT and CHANNEL programme.

Forced Marriage

The protocol is based upon best practice guidelines The Right to Choose: multi-agency statutory guidance for dealing with forced marriage (HM Government, 2008), in conjunction to safeguarding and promoting the welfare of children (i.e. a person who has not reached their 18th Birthday), as listed in section 11 of the Children Act 2004 and under sections 175 and 157 of the Education Act 2002.

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

Possible indicators that a pupil may be at risk of forced marriage include:

- a child may appear anxious, depressed and emotionally withdrawn with low self- esteem;
- a child may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia;
- sometimes a child may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol;

- a child may present with a sudden decline in their performance, aspirations or motivation;
- a decline in punctuality which may be the result of having to “negotiate” their way out of the house;
- running away from home;
- no time allowed for extra-curricular activities;
- family history of older siblings leaving education early and marrying early.

Appropriate action, recording, referring and support will be put in place in line with the usual safeguarding procedures.

Child-on-child Sexual Violence and Sexual Harassment

- Staff are aware of the harm that can be caused by children on each other and we have broken this down in 2 further sections, however in both we act immediately and on individual cases decide if we should manage the case internally, seek early help with a multi-agency approach, refer to children's social care and or report the case to the police in most serious cases. This is done by the DSL working with the Pastoral team when appropriate to address the key issues and take the necessary next steps.

Peer on Peer Abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the School's anti-bullying procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures. Peer on peer abuse can include: sexual bullying at school; being coerced to send sexual images; physical and sexual assaults and violence; child sexual exploitation and teenage relationship abuse. Gang-affected young women are particularly vulnerable to being sexually exploited for protection, status, drugs or money.

The School takes peer on peer abuse seriously and all staff are clear that peer on peer abuse should not be passed off as “part of growing up” or “banter”. Incidents of peer on peer abuse will be dealt in line with the normal School safeguarding procedures.

In dealing with peer on peer abuse, the School recognises:

- that peer on peer abuse often occurs in the same school or neighbourhood, thus it is important any response takes account of how a network of peer relationships is affected;
- the relationship between sexual exploitation, serious youth violence, and teenage relationship abuse, and the need to ensure it is recognised when young people are experiencing multiple forms of abuse;
- that young people who have experienced abuse and exploitation can also be groomed to abuse their peers, requiring a much more holistic approach to

safeguarding;

- that different gender issues can be prevalent;
- that peer on peer abuse can be influenced by the nature of the environments in which young people spend their time (e.g. exposure to violence on the streets, exposure to harmful social norms related to gender, relationships and consent);
- that peer on peer abuse hinges upon young people's experiences of power, and ultimately the notion of consent (while young people who abuse their peers have power over the young person they are harming, they may be simultaneously powerless in relation to some peers who are encouraging their behaviour or in the home where they are being abused).

The School also recognises that an alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Any decision on action in respect of the alleged perpetrator must be based on the risk they pose to other children and what can be done to minimise this risk. Assessment of an alleged perpetrator's needs will include consideration of:

- the nature, extent and context of the abusive behaviours;
- the young person's development and family and social circumstances;
- whether the young person appears to pose a continuing risk and, if so - who is likely to be at risk from him/her, and the nature and degree of the risk;
- the young person's need for services, both those which relate to his/her harmful behaviour and other significant needs;
- whether the young person is also at risk of significant harm and should be the subject of a child protection conference; and
- whether action is to be taken within the criminal justice system.

Appropriate action, recording, referring and support will be put in place in line with the usual safeguarding procedures

Peer on Peer Abuse: Sexting

There are a number of definitions of sexting but, for the purposes of this policy, sexting is simply defined as images or videos generated by children under the age of 18, or of children under the age of 18, that are of a sexual nature or are indecent. These images are shared between young people and/or adults via a mobile phone, handheld device or website with people they may not even know.

Sexting may be categorised as:

Aggravated incidents of sexting involving criminal or abusive elements beyond the creation of an image. These include further elements, adult involvement or criminal or abusive behaviour by minors such as sexual abuse, extortion, threats, malicious

conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a minor who was pictured.

Experimental incidents of sexting involve youths taking pictures of themselves to share with established boy or girlfriends, to create romantic interest in other youth, or for reasons such as attention seeking. There is no criminal element (and certainly no criminal intent) beyond the creation and sending of the images and no apparent malice or lack of willing participation. *Wolak and Finkelhor 'Sexting: a Typology' March 2011*

Young people involved in sharing sexual videos and pictures may be committing a criminal offence. Specifically, crimes involving indecent photographs (including pseudo images) of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978 and Section 160 Criminal Justice Act 1988. Under this legislation it is a crime to:

- make an indecent photograph or allow an indecent photograph to be taken;
- make an indecent photograph (this includes downloading or opening an image that has been sent via email);
- distribute or show such an image;
- possess with the intention of distributing images;
- advertise; and possess such images.

Incidents of sexting will be dealt in line with the normal School safeguarding procedures. In responding to a disclosure regarding sexting, the School will consider:

- Is the pupil making a disclosure about receiving an image, sending an image or sharing an image?
- What sort of image is it? Is it potentially illegal or is it inappropriate?
- How widely has the image been shared and is the device in their possession? Is it a school device or a personal device?
- Are there other pupils and/or young people involved? Do they know where the image has ended up?

In line with the revised Education Act 2011 and the Powers of Search Policy, the School may examine, confiscate and securely store a device if there is reason to believe it contains indecent images or extreme pornography. The School will not search a mobile device even in response to an allegation or disclosure if this is likely to cause additional stress to the pupil/young person unless there is clear evidence to suggest that there is an immediate problem.

If any illegal images of a child are found, the school will consider whether to inform the police. As a general rule it will almost always be proportionate to refer any incident involving "aggravated" sharing of images to the police, whereas purely "experimental" conduct may proportionately be dealt with without such referral, most particularly if it involves the child sharing images of themselves. Any conduct involving, or possibly

involving, the knowledge or participation of adults should always be referred to the police. If an “experimental” incident is not referred to the police, the reasons for this should be recorded in writing. In making a decision to refer, the School will take into a range of factors such as the age of the victim, the level of coercion involved and the degree of nudity in the images.

If the image has been shared across a personal mobile device, the School: will confiscate and secure the device(s);

- will not view the image unless there is a clear reason to do so;
- will not send, share or save the image anywhere;
- will not allow pupils to view, send, share or save the image.

If the image has been shared across a school network, a website or a social network, the School: will block the network to all users and isolate the image;

- will not send or print the image;
- will not move the material from one place to another;
- will not view the image unless there is a clear reason to do so.

The School will never print an image as evidence.

Appropriate action, recording, referring and support will be put in place in line with the usual safeguarding procedures.

Children and the court system

Karen Barnham and senior DSL alongside the Headteacher and any other key worker to support pupils in school throughout the process. The 5-11 or 12-17 years olds PDF is used when appropriate. We are also aware pupils going to court as a victim, again the same team as above aim to support the pupil through this process and after regardless of the outcomes. Where appropriate after courts have separated parent and child, the dispute resolution service is used if the schools support and intervention isn't effective with Social worker being the person who overseeing all decisions for the holistic welling-being of the child.

Children with family members in prison

Key Pastoral staff are aware of pupils whose parent is or had been in prison and support is implemented for those with parent in prison and communication is made with the parent to ensure the school works with the family throughout the time the pupil is at Chace.

County lines

All staff are aware of County lines concerns and Pastoral team have annual training to prevent and pick up early signs. We also work with the local PRU to have workshops where there are early signs to support pupils and prevent them going missing which is hared with

parents/carers. Furthermore we also work with external agencies where pupils have gone missing and immediately initiate a TAF meeting to support the family and aim to put in place interventions to prevent a re-occurrence.

Domestic abuse

This is covered under the training for staff alongside forced marriage, honour killings and FGM as there is a pattern of incidents of controlling, coercive and often violent or abusive. This is also covered by pupils in their Life Skills programme to ensure we are all aware of the issue and support for those affected due to its long lasting emotional effects.

Homelessness

The Homelessness Reduction Act 2017 places a new legal duty on English councils, the Pastoral team and in particularly Karen Barham liaises with the support for pupils who are at risk of being homeless and differentiates support for those under 16 and those over accordingly.

Commitment to Learning
High Expectations
All Can Succeed
Confidence and courage
Everyone valued equally

ONLINE SAFETY POLICY

Principles

We are committed to developing Chace as an *inviting, purposeful, successful learning community*, working together to improve learning and teaching and to raise achievement to enable all our students to meet, with confidence, future challenges. We recognise that 21st Century learners will increasingly learn alongside and with new technologies and we want them to be safe online.

Chace Community School is developing as a flexible online environment where:-

- appropriate and cutting edge resources can be accessed whenever and wherever they are needed, including from home.
- learning is enhanced by a range of personalised opportunities using ICT both in and out of the classroom.
- students are prepared for the digital age in the workplace and further learning.

Aims

We aim to promote online safety by:

- Setting out the key principles expected of all members of the school community with respect to the use of ICT-based technologies.
- Safeguarding and protect the children and staff
- Assisting school staff working with children to work safely and responsibly with the internet and other communication technologies and to monitor their own standards and practice.
- Setting clear expectations of behaviour and/or codes of practice relevant to responsible use of the internet for educational, personal or recreational use.
- Having clear structures to deal with online abuse such as cyberbullying which are cross referenced with other school policies.
- Ensuring that all members of the school community are aware that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken.
- Minimising the risk of misplaced or malicious allegations made against adults who work with students.

Purpose

The purpose of this policy is to ensure that students and staff at Chace Community School understand and are protected from the risks which electronic communications can present.

- Online Safety is an aspect of Safeguarding and as such, this policy should be read alongside the Chace policy on Safeguarding, Child Protection and Confidentiality. For clarity, some aspects of our broader Safeguarding policy are re-iterated below.

- In accordance with The Children Act 2004 and previous legislation the school's paramount concern is that every child is healthy, safe, enjoying and achieving, participating fully in school, by making a positive contribution to school and the community, and achieving economic well-being.
- 'Keeping children safe in education', September 2018 (DFE) makes specific reference to the role of the internet as a vehicle for abusing behaviour and The London Child Protection Procedures (Fifth edition updated March 2017) refer to a range of ways in which young people can be vulnerable as a result of use of the internet or social media. These include bullying, abuse and grooming for sexual exploitation or political/religious extremism.
- As with all aspects of Safeguarding, the school works within the framework of the London Child Protection procedures and the Enfield Safeguarding Children Board (<http://www.enfieldscb.org/>) policies and procedures. When working with other agencies, we follow the guidance contained in 'Working Together to Safeguard Children' (DFE, July 2018).
- All Chace staff and governors are committed to keeping children and young people safe and take appropriate action to make sure that they are safe both at home and at school:
 - by establishing and maintaining an environment where children feel secure, are encouraged to talk, and are listened to;
 - by seeking to provide a safe environment that is conducive to learning;
 - by identifying children and young people who are suffering or likely to suffer significant harm;
 - by ensuring children know that there are adults in the school they can approach if they are worrying;
 - by providing opportunities in the Lifeskills curriculum for children to develop the skills they need to recognise and stay safe from abuse.
- The school respects the basic needs and rights of children and has an expectation that parent(s)/carer(s) also respect these rights. We recognise that all matters relating to Child Protection are confidential and are only shared with members of staff on a need-to-know basis.
- **Complete confidentiality cannot and should never be promised to the child in cases of risk/suspicion of harm.** Instead it is explained that the information disclosed may need to be shared with other professionals to help keep the child and perhaps other children safe.
- It is the school's usual practice whenever possible to work closely with parents on issues concerning the welfare of their children. This is referred to in the Chace Home-School Agreement which is signed by parents of all students when they join the school.
- We actively seek to empower children to talk to their parents/carers about sensitive/difficult issues. Following 'Fraser guidelines', the school understands that if a teenage child is judged to be capable of understanding the decision s/he is making and capable of understanding the likely consequences of making that decision, then information is usually only disclosed to a parent with the child's consent, regardless of parental responsibility. However, our practice is informed by the Sexual Offences Act (2003) that "children 13 years old and under are considered to be of insufficient age to give consent to sexual activity". Nevertheless, if the child is considered to be at risk the needs of the child supercede confidentiality.

- Except in cases of significant risk to the child, the school may seek hypothetical advice on a 'what if' basis from relevant professionals in making internal assessments (e.g. suspected failure to thrive) prior to formal referral.
- A statement in the school brochure informs parents and carers about our school's duties and responsibilities under child protection procedures. Parents can obtain a copy of the school child protection policy on request, or download it from the school website.

Ofsted have identified the main areas of risk for school communities as follows:

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.

(Keeping children safe in education, OFSTED September 2016)

Roles and Responsibilities

In order to address this increasingly important and rapidly changing issue, we have introduced the following leadership, consultation and accountability structure.

Role	Key Responsibilities
Governing Body	<ul style="list-style-type: none"> • Ensure the Online Safety policy is implemented, monitored and reviewed.
Headteacher	<ul style="list-style-type: none"> • Ensure, along with the Governing Body, that the Online Safety Policy is implemented, monitored and reviewed (annually).
Online Safety Co-ordinator (Deputy Head or Assistant Head)	<ul style="list-style-type: none"> • Ensure that staff are aware of their responsibilities under the policy and are given appropriate training and support to enable them to fulfil their responsibilities. • Ensure that issues with Online Safety, are addressed within the curriculum • Lead the Online Safety Group. • Ensure the school remains "up to date" with Online Safety issues and guidance through liaison with the local authority Online Safety Office and through organisations such as Becta and The Child Exploitation and Online Protection (CEOP) • Ensure the Headteacher, School Leadership Team and Governors are updated as necessary, including being aware of local and national guidance on Online Safety and they are updated annually on policy developments • Ensure that students have appropriate access to education and guidance on Online Safety issues, through the curriculum, assemblies and targeted events • Ensure that training, information and guidance is available for staff,

Role	Key Responsibilities
	parents and governors <ul style="list-style-type: none"> • Ensure that incidents involving aspects of Online Safety are recorded and monitored. • Ensure that the appropriate actions are taken to address Online Safety concerns. • Ensure that information from monitoring is used to inform decisions about how best to protect members of our school community. • Ensure that a range of stakeholders is consulted as part of the on-going development of our Online Safety strategy (students, parents, staff and governors) • Ensure that all students have read, understood and signed an Acceptable Usage Agreement in September of each academic year (A copy of this is kept on file)
ICT Team	<ul style="list-style-type: none"> • Ensure the school network is safe and secure for all groups – consistent application of protocols and management and development of software • Advise the Online Safety Co-ordinator and Online Safety group on Online Safety issues/technology and, where necessary, to provide such guidance to the Governing Body/Leadership Team/ • Ensure that all data held on Students and staff held within school has appropriate access controls in place. • Ensure that all parents/carers have read, understood and completed an Acceptable Usage Agreement • Ensure that all staff have read an Acceptable Usage Agreement and sign to agree that they understand it and will abide by its terms and conditions.
Designated child protection team	<ul style="list-style-type: none"> • Record incidents with an Online Safety aspect to them on the school MIS system, under the category of online safety. Incident forms require staff to consider online safety aspects and those incidents with these aspects are passed to a member of the CP team.
Teachers	<ul style="list-style-type: none"> • Promote, model and support safe behaviours in classrooms and ensure that Online Safety procedures are followed
All staff	<ul style="list-style-type: none"> • Read, understand, adhere to and promote the schools policies and guidance • Ensure any digital communications with Students are conducted on a professional level, using only platforms approved by the Headteacher (See specific references below)
All Students	<ul style="list-style-type: none"> • Read, understand and adhere to the student Acceptable Use Policy • Understand the importance of reporting abuse, misuse or access to inappropriate materials • Know what action to take if they or someone they know feels worried or vulnerable when using online technology • Know and understand school policy on the use of mobile phones, digital cameras and hand held devices. • Know and understand school policy on the taking / use of images and on cyber-bullying. • Take responsibility for learning about the benefits and risks of using the Internet and other technologies safely both in school and at home
	<ul style="list-style-type: none"> •

Online Safety Education and Curriculum

Student Online Safety curriculum

Online Safety themes are explored in a range of subject areas; however, most of Online Safety teaching takes place within the Lifeskills. From September 2017, each student in years 7 to 10 will have a minimum of 3 lessons per year related to Online Safety issues. These lessons will be based on guidance from trusted sources of advice such as CEOP (The Child Exploitation and Online Protection Centre), the PSHE association (of which Chace are members) and themes emerging from monitoring of Online Safety incidents.

We also need to recognise that, young people can be exposed to extremist influences or prejudiced views, particular those via the internet and other social media. "Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol. Schools' work on Prevent needs to be seen in this context. The purpose must be to protect children from harm and to ensure that they are taught in a way that is consistent with the law and our values. Awareness of Prevent and the risks it is intended to address are both vital. Staff can help identify, and refer to the relevant agencies, children whose behaviour suggests that they are being drawn into terrorism or extremism" (*Prevent Strategy*). *The Lifeskills programme addresses all of these issues over the 4 year programme.*

A webpage as part of the Chace website provides links to frequently updated, trusted websites which provide information and guidance about Online Safety in forms which are appealing and accessible to young people.

Staff and governor training

All staff and governors will receive formal Online Safety training at least every 2 years, as part of Basic Child Protection training. New recruits will, from September 2017, also receive this training as part of their initial Child Protection training. Additional training will be provided in response to specific concerns.

A staff and governor Online Safety webpage is part of the Chace website and contains links to frequently updated, trusted websites which provide information, professional advice and resources.

Parent and Carer awareness and training

A Parent Online Safety webpage as part of the Chace website contains links to frequently updated, trusted websites which provide information on electronic communication for parents and carers. These sites also provide advice and guidance on how to support young people in using the internet and other communication safely.

The school will also run a parent/carers Online Safety awareness evening annually during the summer term. We will invite the parents/carers of existing students and those of students enrolling in the next academic year.

Managing the ICT infrastructure

The School Network

The security of the School network is maintained by the ICT team, under the leadership of the school IT Manager. Their role is to:

- Ensure the health of the network through the employment of appropriate anti-virus software etc. and network setup, so that staff and students cannot download executable files.
- Ensure that the filtering methods are effective in practice and that access to any website considered inappropriate by staff is removed immediately.

- Prevent student access to internet logs
- Use individual log-ins for students and all other users
- Provide advice and information on reporting offensive materials, abuse/bullying etc. available for Students, staff and parents

Internet, Email and Social Networking

At Chace we recognise that access to the internet is an invaluable learning tool and vital for effective communication. Risks are minimised by

- The supervision of students using the internet within school at all times, as far as is reasonable.
- The use of filtering which blocks sites that fall into categories such as pornography, race hatred, gaming, other sites of an illegal nature
- Ensuring all users know and understand what the “rules of appropriate use” are and what sanctions result for misuse (through induction and teaching)
- Ensuring ‘blocks’ are applied to chat rooms, social networking sites, music downloads and shopping sites, except those used for specific educational purpose
- Establishing that email and internet use are not private and the school reserves the right to monitor all emails and internet usage involving the schools IT facilities/ services
- Allocating an email address through the school domain- enabling students to access the email from school and at home
- Discouraging the use of personal email addresses, staff are instructed to use the school domain for all professional purposes
- Ensuring staff do not communicate with, or have details of, students via their personal email or social networking site account
- Ensuring that staff do not have student contact details on their personal mobile phones; except for the specific duration of a school trip/visit
- Ensuring that, where staff use Social Networking sites to communicate with students, parents and/or the wider community, the use of these sites is agreed in advance with the Headteacher and strict protocols are followed.

Passwords policy

Chace ensures security is maintained by the use of passwords in the following ways:

- Staff and students are responsible for keeping all passwords private , not sharing them with others or leaving them where others may find them
- All users are made aware that it is unacceptable to log on as another user or allow another individual to log on using their password
- Staff and students are made aware that students should never be allowed to use teacher or staff logins
- On occasions when guest accounts are created for external or short-term visitors these provide temporary access to appropriate services only

Equipment and Digital Images

The following rules apply to the use of personal mobile phones and mobile devices:

- Mobile devices are brought into school entirely at the individual’s own risk. The School accepts no responsibility for the loss, theft or damage of any phone or hand held device brought into school.
- No images or videos should be taken on mobile phones or personally-owned mobile devices without the prior consent of the person or people concerned.

To prevent the inappropriate use of images the following procedures are observed:

- We gain parental/carer permission when students join the school for use of digital photographs or video involving their child. This ensures that parents are aware that images of their child may be used to represent the school, and opt out if they do not wish their child's image to be used.
- We do not identify students in online photographic materials or include the full names of students in the credits of any published school produced video materials / DVDs;
- If specific student photos (not group photos) are used on the school web site, in the prospectus or in other high profile publications the school will obtain individual parental or student permission for its long term use
- Students' names are not used when saving images in the filenames or in the <ALT> tags when publishing to the school website
- The Headteacher takes overall editorial responsibility to ensure that the website content is accurate and quality of presentation is maintained

Complaints

Role of the school

The school will take all reasonable precautions to ensure Online Safety. However, owing to the international scale and linked nature of Internet content, the availability of mobile technologies and speed of change, it is not possible to guarantee that unsuitable material will never appear on a school computer or mobile device. Neither the school nor the Local Authority can accept liability for material accessed, or any consequences of Internet access.

- Our Online Safety Coordinator acts as first point of contact for any complaint.
- Any complaint about staff misuse is referred to the Headteacher.
- Staff and students are given information about infringements in use and possible sanctions.
- Complaints of cyberbullying are dealt with in accordance relevant policies.
- Complaints related to child protection are dealt with in accordance with school/LA child protection procedures.

Investigation of complaints

The school will investigate complaints received from both internal and external sources, about any unacceptable use of ICT that involves the school IT facilities

The investigation of facts of a technical nature will be undertaken by the Network Manager in conjunction with other departments as appropriate.

Where there is evidence of a criminal offence, consideration will be given as to whether the issue will be reports to the police for them to take appropriate action. The school will co-operate with the police and other appropriate agencies as required in the investigation of alleged offences.

In the event that the investigation of the complaint establishes that there has been a breach of the standards of acceptable use, then appropriate action will be taken.

Cyber bullying

The use of the internet, email, text messages, video or audio to bully another student or member of staff will not be tolerated.

It should be noted that the use of ICT to bully could be against the law. Abusive language or images used to bully, harass or threaten another, whether spoken or written, may be libellous and contravene the Harassment Act 1997 or the Communications Act 2003.

Sexting

See Appendix 6 of the SAFEGUARDING, CHILD PROTECTIONS AND CONFIDENTIALITY POLICY

False accusations and social media

Under Section 13 of the Education Act 2011, it is an offence to name a member of staff against whom an allegation has been made, including on social media. If there is a concern about a member of staff, that concern should be raised with the Headteacher so that it can be addressed in the appropriate manner. Remarks made on social media about a member of staff or references to an unproved allegation are offences.

Review and Monitoring

The Online Safety coordinator is responsible for document ownership, review and updates.

The Online safety policy will be reviewed annually or when any significant changes occur with regard to the technologies in use within the school.

The GDPR and the Data Protection Act 2018

From 25th May 2018, providers must refer to the General Data Protection Regulation (GDPR). This replaces the Data Protection Act 1998 and strengthens the requirement to be clear and transparent about the use of personal and sensitive data, keep records that are accurate, relevant and up-to-date and ensure all records are kept securely and for no longer than is necessary for the purpose.

Enfield's guidance to best practice is adhered to with any incidences reported using the appropriate methods. Staff are trained in keeping passwords secure and change regularly (automated), and never to share. To lock / log off computers when away from their desks. To dispose of confidential paper waste securely by shredding. To prevent virus attacks by taking care when opening emails and attachments or visiting new websites. Working on a 'clear desk' basis - by securely storing hard copy personal information when it is not being used. That visitors should be signed in and out of the premises, or accompanied in areas normally restricted to staff. About positioning computer screens away from windows to prevent accidental disclosures of personal information. This includes not disclosing personal information on the phone, or any other method without the permission of the person or persons.

Sept 2018