# Britannica Safeguarding and Child Protection Policy

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| **Approved by:** | M W Clack, Principal | **Last reviewed on:** | September 2026 |
| **Date:** | September 2026 | **Next review due by:** | August 2027 |

## School Vision

*At Britannica, we challenge and stretch our students to become responsible, respectful and resolute global citizens. Within our caring, safe and secure international community, they evolve into independent and inquisitive lifelong learners, happily striving for excellence in everything they do.*

## Rationale

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

## Introduction

The health, safety and well-being of all our children are of paramount importance to all the adults who work in the school. The Hungarian Government is a signatory of the UN convention on the Rights of the Child which was signed in 1994. As such our children have the right to protection, regardless of age, gender, race, culture or disability. They have a right to be safe in our school.
In our school we respect our children. The atmosphere within our school is one that encourages all children to do their best. We provide opportunities that enable our children to take and make decisions for themselves.
Our teaching of personal, social and health education and citizenship, which broadly follows the National Curriculum for England, helps to develop appropriate attitudes in our children and makes them aware of the impact of their decisions on others. We also teach them how to recognise different risks in different situations, and how to behave in response to them. We give opportunities for children to discuss problems or concerns with an adult as part of our pastoral programme.
Where there is no conflict with Hungarian law, this policy is reflective of:

- 'The Education (Independent School Standards) Regulations' (ISSR)
- 'Keeping Children Safe in Education' (KCSIE) – 2026
- 'Working Together to Safeguarding Children' (WTSC) - 2026
- 'Prevent Duty Guidance for England and Wales' - 2023
- 'Framework for the Early Years Foundation Stage' - 2026
- 'KCSIE 2026 Guidance'
- Human Rights Act 1998
- The Equality Act 2010

It is also informed by DfE advice, 'What to do if you are worried a child is being abused – advice for practitioners' 2023.

In child protection matters the school will follow the inter-agency and child protection procedures laid down by the relevant Local Safeguarding Board in Hungary.

- Family Support and Child Welfare Centre / local child protection office: Családsegitő és gyermekjóléti központ | Hegyvidéki Önkormányzat
- Directorate General for Social Affairs and Child Protection: Szociális és Gyermekvédelmi Főigazgatóság
- 1997 Act XXXI on the Protection of Children and the Administration of Guardianship: Gyvt. - 1997. évi XXXI. törvény a gyermekek védelméről és a gyámügyi igazgatásról (please note, there are amendments to the Act, 2021 and 2024).

## Application

This policy applies to all teaching, non-teaching, pastoral, support, peripatetic, contract staff and ancillary staff, volunteers, non-school based staff, and any other adults working at Britannica. All references in this document to "staff" or "members of staff" should be interpreted as relating to them, unless otherwise stated.
Throughout the document, the term DSL is used: Designated Safeguarding Lead.
This Safeguarding Policy and the Code of Conduct applies to all pupils and adults in the school, including when being educated off-site and undertaking an educational visit. It also applies to pupils 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 and placed on the school website. Rather than duplicating content from Keeping Children Safe in Education (September 2026) in this policy, 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 child
- 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

## Contact details

The following pages outline the contact details of named staff in Britannica and external agencies linked to child protection and safeguarding.

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

**Britannica and Local Contacts**

| Role | Name | Contact |
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| Designated Safeguarding Lead (DSL) | M W Clack (Principal) | contact@britannicaschool.hu |
| DSL | Marie Moreton (Head of Primary) | m.moreton@britannicaschool.hu |
| DSL | Steve Moruzzi (Head of Secondary) | s.moruzzi@britannicaschool.hu |
| Deputy DSL | (Counsellor) | |
| Ariston Director of Education | M W Clack | contact@britannicaschool.hu |
| Ariston CEO | Tammy Murphy | contact@britannicaschool.hu |

School number: 0036306247240. School email: contact@britannicaschool.hu

**Local Contacts**

| Agency | Contact number |
|---|---|
| Directorate of Social Affairs and Child Protection (Szocialis es gyermekvedelmi Foigazgatosag) | +36 1 412 97 42 |
| Child Welfare Agency of Budapest District 12 (Gyermekjoleti szolgalat) | +36-1-224-59 00 |
| National Institute for Family and Social Policy | +36 1 237 67 00 |
| Local Police Emergency | 112 |
| Local Police | 06 1 457-5650 |

## 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 pupils by creating and maintaining an open, safe, caring and supportive atmosphere.
We have three primary aims:

- Prevent harm
- Protect pupils from harm
- Support pupils and staff when child protection and safeguarding incidents occurs

The school achieves these aims by:

- Ensuring the recruitment of individuals who are suitable and appropriate to work with children and who have positive safeguarding attitudes.
- Undertaking relevant background checks (police/criminal records, references, simple online search without breaching privacy of applicants).
- Providing excellent pastoral care and fostering optimism and a positive school atmosphere where pupils feel secure and are encouraged to talk. Pupils 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. Pupils 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 pupils, via PSHE and a varied curriculum, to identify, reduce and manage risks. This includes educating pupils, through regular internal and externally provided ICT safety talks, about the safe use of electronic equipment and access to the internet.
- Ensuring that children 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 child protection, safeguarding and welfare concerns confidentially with the Designated Safeguarding Lead (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.
- Reminding staff that children may not always be ready to discuss or may not recognise that they are being abused.
- 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 Child Services support agencies as appropriate.

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

### 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 child 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 child s/he should report the Record of Concern form (appendix D). If staff members have nagging doubts or questions they should speak immediately to the Designated Safeguarding Lead ("DSL") or in their absence to the Deputy Designated Safeguarding Lead ("DDSL") or Principal. 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 in the Wellbeing Manager / ISAMs.

### 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 children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. If a member of staff has a concern that a child may be in need of early help then s/he should, in the first instance, report it by completing a Record of Concern and discuss early help requirements with the DSL.
Where a child and family would benefit from coordinated support this would be discussed with on-site counsellor and Learning Coordinator, along with the DSL. If early help is appropriate, where they are not taking the lead, then the DSL should support the member of staff.
Effective early help in a school setting involves the School (under the guidance of the DSL) providing high quality support to help address the assessed needs of the child and their family early, in order to significantly improve the outcomes for the child. It is hoped that in each case this should improve the welfare of the relevant child. However, each case should be kept under constant review, and consideration should be given to a referral to Hungarian social care if the child's situation does not appear to be improving.

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

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

they are deemed to be a risk to the child. 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 child all staff should act with the utmost discretion and any pupils who are involved will receive appropriate care and support. Staff should always listen to a pupil who wants to talk about a concern. If a child tells a member of staff that they know about or have been a victim of child abuse or neglect the member of staff should:

- Allow the child to speak freely and remain calm. Do not interrupt the child 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 child 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 child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.
- Write up their conversation as soon as possible creating a Record of Concern in Wellbeing Manager.
- Seek support if they feel distressed.

### Child on Child abuse

If a member of staff thinks for whatever reason that a pupil 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 using a Record of Concern form and talk to the DSL or Principal immediately (see the School's Anti-Bullying Policy which is accessible on the School's website for further details).
All staff should be aware that (a) safeguarding issues can manifest themselves via child on child abuse; and (b) that children 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 children), sexual assaults, sexting and gender issues within groups of girls and boys. Should an allegation of abuse be made against another pupil all children involved (whether perpetrator or victim) will be treated as being "at risk". Where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, the allegation will be referred to Hungarian social services. The concern may indicate that one or more of the pupils concerned may be in need of additional support. Where appropriate, the matter will be dealt with under the School's Behaviour Policy with the use of relevant disciplinary sanctions.

### Absences and children missing from education

The following are considered absences in education:

- Illness (absences exceeding three days may require a physician statement).
- Medical/Dental appointments (it is encouraged to make these appointments outside of school hours).
- Required county/state court appointments.
- Religious instruction (Not to exceed 3 hours in one week).
- Driver's license test.
- Serious family emergency i.e. funeral.

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at

significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

**Confidentiality**

Staff should never guarantee confidentiality to pupils or adults wishing to tell them about something serious as this may ultimately not be in the best interests of the child. 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 child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

One of the best ways to help children 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 children 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 children 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 children. Staff should also be alert to any comments or jokes made by other children 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 children 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 childhood 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.

**Child on child Abuse**

Child on child abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others.

All staff should recognise that children are capable of abusing their peers.

All staff should be aware of safeguarding issues from peer abuse including:

- bullying (including online bullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

This abuse can:

- Be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences
- Result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable adults are at particular risk of harm

Children or young people who harm others may have additional or complex needs e.g. significant disruption in their own lives; exposure to domestic abuse or witnessing or suffering abuse; educational under-achievement; involved in crime.
Stopping violence and ensuring immediate physical safety is the first priority of any education setting, but emotional bullying can sometimes be more damaging than physical. School staff, alongside their Designated Safeguarding Lead and/or Deputy, have to make their own judgements about each specific case and should use this policy guidance to help.

**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 child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
There isn't one sign to look out for that will prove that a child is being physically abused. But if a child 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 child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Signs of sexual abuse displayed by children 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 child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.
Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;

- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.
- It may also include neglect or, or unresponsiveness to, a child's basic emotional needs. Signs of possible neglect include: the child 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 child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 child 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 children. These may include interactions that are beyond the child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, 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 child 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 children;
- 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 children;
- 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

**Children with Special Educational Needs and/or Disabilities**

Children 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 children. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- that children 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 child 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 child;
- appears indifferent to or overtly rejects the child;
- denies existence of or blames the child for the child's problems at home or at school;
- sees and describes the child as entirely worthless, burdensome or in another negative light;
- refuses offers of help for the child's problems; or
- is isolated physically/emotionally.

**Grooming**

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children 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 children 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. Children 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 children, 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 child 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 child
- Affording special attention or preferential treatment to a child
- Excessive time spent alone with a child outside of the classroom/school
- Frequently spending time with a child in private or isolated areas
- Transporting a child to or from the school
- Making friends with a child's parents and visiting their home
- Acting as a particular child's confidante
- Giving small gifts, money, toys, cards, letters to a child

- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child

**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 child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy
- Gain the trust of others – Institutional offenders are often popular with children 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 child - This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
- Isolating the child - 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 child 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 Children Safe in Education (September 2026). 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/children.

**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 child 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 child 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 in the Multi-Agency Practice Guidelines, which also cover the role of schools. FGM can also link to Honour Based Violence (see KCSIE for further information).
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 children's social care as appropriate. Any other adults with concerns about FGM should report their concerns to the DSL immediately.

**Child Sexual Exploitation (CSE)**

CSE is a form of abuse which involves children 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 pupil is missing**

The School needs to be aware of those pupils 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 children from going missing from education. For details of the School's procedures and responses please see our separate policy entitled ‘Lost or Missing Children’ and ‘Attendance Policy’. The latter contains the school’s procedures for unauthorised absence, including on repeat occasions, as well as referral to the Hungarian authorities.

**Preventing radicalisation and extremism**

It is the School’s duty under the Counter Terrorism & Security Act 2023 (The Prevent Duty) to have due regard to the need to prevent pupils from being drawn into terrorism. The referral procedures set out above also apply where there are concerns about children 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 child being drawn into terrorism. All staff should familiarise themselves with and follow the procedures set out in this policy. The DSL is the designated Prevent duty person responsible for co-ordinating action within the school and liaising with other agencies, including the Prevent Lead.

**Corporal punishment**

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

**Online safety (see also school online safety policy)**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school to protect and educate pupils,

students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

**Annex A: Safeguarding information for school staff**

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

A framework and tool for schools to use to embed digital resilience is available through the UK Council for Internet Safety, the Digital Resilience Framework, the National Grid for Learning's online safety audit, and related DfE guidance and publications, including 'Education for a Connected World'.

The School takes a proactive approach to teaching children 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 children in our school is dependent on the vigilance of all our staff and their prompt communication to the DSL or Principal 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 children. 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 pupils 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 children. 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**

**Aim:** 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 Children' which states "Children 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 children.
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 to the Principal 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 Principal as soon as possible and in any event within 24 hours of becoming aware of it. The Principal will in the first instance satisfy him/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 CEO, if necessary on a no-names basis.
Having established that the concern is low-level the DSL or Principal 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 and Ariston will always adhere to the guidance in Keeping Children Safe in Education (September 2026).
**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 child, or may have harmed a child; (b) possibly committed a criminal offence against or related to a child; or (c) behaved towards a child or children in a way that indicates he or she could pose a risk of harm to children.
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 DSL will refer this to the Ariston Safeguarding Governor (Karl Wilkinson, Director of Education). The Safeguarding Governor will liaise with the CEO, Director of Education and inform the Ariston Board.

**How will higher level concerns or allegations be handled? The Principal (or Director of Education in the case of an allegation about the Head) will contact the CEO and conduct a strategy team. The decision of the strategy team could be:**

- official investigation by Hungarian social services
- police investigation if there is a criminal element
- single agency investigation by the school involving Ariston HR Advisor.

### Confidentiality and Information sharing

When an allegation is made, the School and Ariston 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 pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or the accused person waives their right to anonymity.

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 child or children 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 Hungarian 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 Hungarian social services will decide what information should be given to parents, staff and other pupils 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 a colleague for support. They should also be given access to welfare counselling, medical advice or directed where they can find legal representation. They will be kept informed of the timescales in accordance with Keeping Children Safe in Education.

### Circumstances where suspension will be considered

If there is cause to suspect that a child or children 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.

### Referrals to other agencies

A prompt referral to the COBIS DSL and Ariston HQ will be made in circumstances where a member of staff has been removed from working in a regulated activity where an allegation is substantiated, or would have been so removed had they not resigned or the school ceased to use the persons' services.

### 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 child protection case, or allegation against an adult working in or linked to the school, has a detrimental effect on staff well-being, Ariston will facilitate access to support and/or counselling if requested.

### Parents and pupils

If a parent or pupil has a safeguarding concern, question, doubt or allegation about the conduct of an adult, s/he should raise it with the Principal. If a parent or pupil 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 Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection in the school. The DSL is a member of the senior leadership team. The school also has named Deputy DSLs 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 Hungarian agencies, keeping up to date with relevant training, keeping staff up to date with relevant safeguarding training, maintaining a secure awareness of child protection and safeguarding, maintaining accurate records, transferring records. The DSL has a specific job description which mirrors Annex B in Keeping Children Safe in Education (September 2026). The DSL and Deputy DSL[s] liaise with the Principal on safeguarding issues and would refer any cases of suspected abuse to the local authority children's 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 child 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. 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 Hungarian agencies in the best interests of the child. We will always adhere to the procedures and practice of the Hungarian authorities as part of inter-agency safeguarding procedures set up by the LSCB(s). Information will be shared securely with other professionals and Hungarian agencies. This commitment includes for children who are in the care of Hungarian social services where we recognise additional vulnerability to under-achievement.

### Support for and supervision of staff

All staff should feel comfortable and confident approaching the DSL, Deputy DSL 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 Child Protection Policy;
- Keeping Children Safe in Education (September 2026) Part 1 and Annex A for adults working directly with children;
- the School's Code of Conduct;
- the School's Safeguarding: Preventing Extremism and Radicalisation;
- 'What to do if you're worried a child is being abused – advice for practitioners' (2015);
- the School's Whistleblowing Policy and
- the role of the DSL.

This training is through EDUCARE training modules.
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 Deputy DSL. 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 child protection updates annually, as minimum. The DSL leads on ensuring that regular safeguarding and child protection updates are circulated to all staff.
The DSL and Deputy DSL[s] receive advanced safeguarding and child protection training at least annually. This includes Hungarian agency working protocols, KCSIE and the child protection procedures and training in preventing extremism.

## Part G: Proprietorial oversight

Ariston is the proprietor responsible for the School. Karl Wilkinson the Director of Education and the CEO David Pottinger are safeguarding level 3 trained and have oversight of all safeguarding matters with the Ariston Board. The Ariston Director of Education meets regularly with the DSL and the Principal to audit safeguarding procedures and practice.

## Part H: Other safeguarding policies

This policy links with the following school policies: Code of Conduct (Staff Code of Conduct), Whistleblowing Policy (Britannica Whistleblowing Policy), Safer Recruitment Policy (Safer Staff Recruitment), Health and Safety Policy, and the Anti-bullying Policy.
Our school prioritises embedding a culture of safe recruitment as part of our strategy for preventing harm to children (see Safer Recruitment Policy). Statutory procedures for checking the suitability of staff and volunteers who work with children are always followed, including checking their identity, obtaining enhanced Disclosure and Barring certificates from the applicant including barred list information for those in regulated activity, mental and physical fitness, right to work in the home country, 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 ucheck (DBS assist online) and all applicants show the original DBS certificate 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 Children Safe in Education (September 2026) 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 children.

**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 child 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 four areas:

- Appendix A – Child on Child Abuse
- Appendix B – Youth Produced Sexual Imagery
- Appendix C – Online Safety
- Appendix D – Record of Concern

## Appendix A – Child on Child Abuse

All staff should be alert to the risk of child on child abuse and understand their role in preventing, identifying and responding to it. Staff should know that children 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. Child on child abuse should be taken as seriously as abuse by adults.

**What is child on child abuse?**

For these purposes, child on child abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms including, but not limited to, serious bullying (including cyber-bullying), relationship abuse, domestic violence, child 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 children 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?**

Child on child 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 child on child abuse?**

By being alert to children's well-being and to signs of abuse. Signs that a child may be suffering from child on child 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, experiencing headaches, 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 child'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 children particularly vulnerable to abusing or being abused by their peers?**

Any child can be affected by child on child abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that (a) child on child abuse is more prevalent amongst children aged 10 and older although it also affects younger children, including by way of harmful sexual behaviour; (b) children 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 child on child abuse?**

Recent research suggests that child on child abuse is one of the most common forms of abuse affecting children. 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 children 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 child may be being abused, or that a child may be abusing others?**

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child 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 child is in immediate danger, or at risk of harm, a referral to children's 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 child on child 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 child.
Where the DSL considers or suspects that the behaviour might constitute abuse Hungarian 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 Hungarian social services and agree on a course of action, which may include (a) taking any steps to ensure the safety and wellbeing of any children 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 Hungarian social services and any relevant Hungarian 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 children;
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved;
- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves;
- take into account the complexity of child on child abuse and of children´s experiences and consider the interplay between power, choice and consent. While children 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 children, 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 children 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 children 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 child is in need of early help or statutory intervention); (e) monitoring the child´s wellbeing closely and ensuring that s/he receives on-going support from all relevant staff members within the School; (f) engaging with the child´s parents and any external agencies to ensure that the child´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, pupils 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 child on child abuse?**

- The School actively seeks to prevent all forms of child on child abuse by educating pupils 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 child on child abuse and any cases of bullying (no matter how trivial) promptly and appropriately.
- Children are educated about the nature and prevalence of child on child 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 child on child abuse.
- Staff are trained on the nature, prevalence and effect of child on child 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 children 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 ChildLine 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 children. 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 children sharing images that they, or another child, 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 child creates and shares sexual imagery of themselves with a peer (also under the age of 18); a child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult; a child is in possession of sexual imagery created by another child.
**No:** the sharing of sexual imagery of children by adults, as that constitutes child sexual abuse and schools should always inform the police; children sharing adult pornography or exchanging sexual texts which do not contain imagery; sexual imagery downloaded from the internet by a child; sexual imagery downloaded from the internet by a child 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 child 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 child should be taken very seriously. A child 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.

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 children 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 child at risk of harm.
- At any point in the process if there is a concern a child has been harmed or is at risk of harm a referral should be made to Hungarian social care and/or the police immediately.

**Education**

Teaching about safeguarding issues in the classroom can prevent harm by providing children with skills, attributes and knowledge to help them navigate risks. The School will provide children 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 children 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 Online Safety Policy, 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 children's experiences of those risks; (b) seeks to mitigate those risks as far as possible without depriving children 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 children 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 children which affect a child´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 children with distorted and unrealistic images of others' lives, causing some children 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 children for the purposes of sexual abuse or radicalisation.
- **Conduct – personal online behaviour that increases the likelihood of or causes harm.** This includes but is not limited to (a) responding to and engaging with individuals seeking to groom or abuse children; (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 child who may be at risk of online harm?**

Any child may suffer from online harm and all staff should be alert to the risk of it. Indicators that a child may be being abused or harmed online overlap with other indicators of abuse which can be found at Section C of the Safeguarding Policy.

**What should I do if I suspect that a child 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?**

Pupils 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 children's exposure to these risks from the school's IT systems, including by putting in place appropriate filters and monitoring systems which protect children from harm whilst not over-blocking.

**Information sharing**

Ariston and the School recognise the fundamental importance of information sharing in protecting children from harm and promoting children'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 children often do not receive the support they need.
The School shares information in accordance with the Data Protection Act 1998 and the guidance set out in Chapter One of Working Together to Safeguard Children (March 2015) and in Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers.
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 children; (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.

## Appendix D – Record of Concern

Staff should use the School's Record of Concern form (held in Wellbeing Manager / ISAMs) to log any concern about a child in line with the procedures set out in Part B of this policy.

Created and reviewed by: Designated Safeguarding Lead and M W Clack, Principal
Approved by: M W Clack, Principal
Policy Category: CORE
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