



Anti-Bullying Strategy

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Girls' Division Anti-Bullying Strategy

Under the Independent School Standards Regulations (ISSRs) 2014, the proprietor of an independent school is required to ensure that bullying at the school is prevented in so far as reasonably practicable, by the drawing up and implementation of an effective anti-bullying strategy.

This policy was drawn up with reference to DfE Guidance on the ISSRs 2019, DfE Guidance (July 2017): Preventing and Tackling Bullying: Advice for head teachers, staff and governing bodies and the DfE fact sheet (March 2014) on how to support children who are bullied. It reflects colleagues' duties under the Equality Act 2010, the Children & Families Act 2014 as well as the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003 and the Public Order Act 1986. It should be read in conjunction with the following documents, as appropriate:

- The Foundation's Safeguarding and Child Protection Policies;
- The Foundation's Acceptable Use Policies;
- The relevant school's Behaviour Management and Rewards and Sanctions Policies;
- The relevant school's school rules and regulations;
- The Girls' Division Senior School's Gender Questioning Policy;
- Appendix 1a: Senior Girls' Anti-Bullying Policy;
- Appendix 1b: Girls' Division Policy on Youth-Produced Sexual Imagery (also known as Sexting);
- *Appendix 2: The Hesketh House Anti-Bullying Policy;
- *Appendix 3: The Beech House Anti-Bullying Policy (including EYFS);
- *Appendix 4: The Nursery Anti-Bullying Policy (EYFS).

**NB These exist as separate documents and are not attached to this version of the Anti-Bullying Policy.*

The Anti-bullying strategy applies whether pupils are in school, on a school trip or otherwise representing the school and during any periods of directed home learning (as during the current Covid-19 pandemic).

At Bolton School Girls' Division, we aim to promote personal dignity and self-esteem, through providing a safe environment which welcomes diversity and encourages mutual respect, and to encourage pupils and students to be sensitive to the beliefs, values and practices of others. Children and young people learn best in a safe and calm environment in which education is the primary focus.

We recognise that bullying, whether emotional or physical, is a serious issue, which has the potential to occur in all schools, and that bullying undermines self-esteem and sense of security, and may affect a child's attendance and attainment. It can lead to serious psychological damage for the victim and a criminal record for the perpetrators. It is possible for any member of the school community to experience bullying. Our policy is to reject and to be seen to reject all forms of bullying. No-one deserves to suffer the pain and indignity that bullying can cause. In developing this policy we have

considered the needs and views of our pupils, their parents, and those of the teaching staff.

Definition of bullying

The DfE Guidance Preventing and Tackling Bullying defines bullying to be “behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally.” Bullying can take many forms, including repeated occurrences of physical, psychological, social or verbal abuse and cyber-bullying (see below). It can involve threats, physical attacks, name-calling, mocking, harassment and sexual bullying. Bullying may be motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It may be directed against those with a special educational need or disability, or a different appearance and/or against those who are suffering from a health problem. Children in care who are frequently moving home may also be vulnerable because they are always a newcomer.

Bullying may be motivated by *actual* differences between children or by *perceived* differences. Bullying can occur between pupils, between pupils and staff, or between staff. Many experts say that bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways: it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate its target. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online. Low-level disruption and the use of offensive language, if left unchallenged or dismissed as banter can have a significant impact on its target, including a reluctance to report other behaviour subsequently. Stopping violence and ensuring immediate physical safety is obviously a school’s first priority but emotional bullying can be more damaging than physical; judgements have to be made about each specific case.

Cyber-bullying

Widespread access to technology provides an additional medium for bullying, which can occur inside or outside school. Cyber-bullying includes using mobile phones or iPads, etc, to send abusive messages, often through public forums such as social networking websites (eg Instagram, snapchat), or make defamatory statements about pupils or teachers. It includes cyber-stalking, “sexting”, “trolling”, “happy-slapping” and unauthorised publication of private information or images. Cyber-bullying can happen at any time of the day, and has the potential to reach a wide audience. It can undermine the self-esteem of individual pupils and can undermine the professional status of staff. Some cyber-bullying is deliberate and intentional, but in other cases distress to the victim can be caused by something that is seen as a joke by the perpetrator.

Cyber-bullying can be a criminal offence; children are criminally responsible for their actions and their consequences from the age of 10. (See ‘Criminal Law’ below). The School also takes seriously its safeguarding responsibilities with regard to the

production and/or dissemination of sexual images by young people (see Appendix 1b).

In seeking to prevent bullying, the School will:

- take a proactive approach to preventing bullying and to mitigating its effects when it occurs;
- create an ethos of good behaviour and an atmosphere of inclusivity and equality where pupils treat one another and the school staff with respect because they know that this is the right way to behave and that our actions affect others;
- communicate clear expectations to pupils and parents about pupil behaviour, including what to do if pupils find themselves bystanders when bullying behaviour occurs, and how to report bullying which occurs inside or outside school;
- involve parents to ensure that they are clear that the School does not tolerate bullying and are aware of the procedures to follow if they believe that their child is being bullied: in the Senior School, they should report any bullying to the Head of School; in the Infants' and Junior Schools, they should report any bullying to the Headteacher or Deputy Headteacher;
- implement disciplinary sanctions so that bullying is recognised as being unacceptable;
- work with the wider community (including the police and children's services in serious and/or persistent cases) and use specific organisations or resources for help with particular problems;
- ensure that staff and older pupils serve as role models of appropriate behaviour, including, where relevant, training pupils as Peer Mentors to provide a listening ear to younger pupils (Hesketh House & Senior Girls);
- develop among staff an appreciation that they should gather information about issues between pupils which might provoke conflict and that they should be observant for signs of bullying behaviour (including changes in a victim's personality) and be open to hearing any child's concerns in any context, but particularly during form time and PSHEE lessons;
- ensure that staff duties take in to account the need to ensure appropriate supervision of areas where bullying might take place at break/lunchtimes;
- ensure that staff understand the need to arrive on time for lessons, as bullying often occurs when no member of staff is present;
- ensure that opportunities provided in lessons (including PSHEE) and by assemblies and other events are used to enable the pupils to understand differences between people and the importance of avoiding prejudice-based language, including racism, as well as to develop the ability to protect themselves from unwanted behaviour through assertiveness training;
- ensure that staff take part in training which enables them to understand the needs of all pupils, including lesbian, gay, bisexual and transgender pupils and those with SEND, and to listen out for inappropriate comments or spot untoward actions;
- consult with groups of pupils to gain a true understanding of what is going on, including at School Council in Hesketh House and Senior Girls;

In addition, in seeking to prevent cyber-bullying, the School will:

- enforce the Foundation's Acceptable Use Policies, including provisions designed to reduce the misuse of the iPads and to prevent cyber-bullying;

- ensure staff keep up to date with the technologies which the pupils are using;
- deliver PSHEE lessons which, in the Senior and Junior Schools, include specific training regarding the safe use of ICT, particularly mobile phones, iPads and the internet, as well as age-appropriate information about grooming, internet sites containing violent or adult content and the dangers of sharing personal information and/or photographs;
- use the School's Device Manager system to prevent Junior and Senior pupils from accessing social media sites on their iPad;
- alert parents (via the Head's email) to sites which are causing problems for pupils;
- restrict use of mobile phones and emails by pupils below Sixth Form during the School day: abuse of this rule leads to the phone being confiscated for the remainder of the day;
- ban pupils from taking a still or moving image on the School site or on the School coaches without the specific, prior permission of a member of staff: this rule is conveyed to pupils regularly, including at an assembly at the start of the year;
- convene an annual meeting in the Senior School between the Deputy Head (Pastoral), Head of PSHEE and the Head of ICT to discuss how Internet safety is dealt with in School, including discussion of how to avoid cyber-bullying and to resist pressure to take part in the production and/or dissemination of sexual images;
- inform parents in Information Evenings about aspects of online behaviour that they should be alert to, including information about grooming, sexting, cyber-bullying, and the dangers of age-inappropriate sites and of sharing personal information and/or photographs;
- regularly evaluate and update our approach to take account of developments in technology, for instance updating 'acceptable use' policies for computers.

In seeking to deal with bullying or cyber-bullying if it occurs, the School will:

- develop clear systems for reporting bullying (including on the grounds of protected characteristics, namely: age; disability; marriage/civil partnership; pregnancy/maternity; gender reassignment; race; religious belief; sex and sexual orientation) and make everyone aware of the procedures to be followed in dealing with incidents; this includes the implementation of the SMLO role
- prevent/de-escalate/stop any continuation of harmful behavior, and use the Restorative Justice procedure where appropriate
- discuss with parents what has been happening;
- react to bullying incidents in a reasonable, proportionate and consistent way, taking in to account any special educational needs or disabilities of both the victim and perpetrator of the bullying, and implementing disciplinary sanctions which reflect the seriousness of an incident and convey a deterrent effect;
- take steps to help 'victims' feel safe and confident again, including by offering counselling services and the use of external agencies where appropriate;
- work with perpetrators where necessary and as appropriate, so that they are held to account for their actions and accept responsibility for the harm they have caused;
- consider whether the motivations behind bullying behaviour reveals any concerns for the safety of the perpetrator;

- maintain a central bullying log which ensures that patterns of behaviour and the effectiveness of interventions can be appropriately monitored;
- deal with issues of the production and/or dissemination of sexual images by young people in line with advice from the UKCCIS (see Appendix 1).

Sanctions which may be applied in the event of bullying

Disciplinary measures will be applied to pupils who bully, in order to show clearly to them and to other pupils that their behaviour is wrong and must not be repeated or copied. Disciplinary measures must be applied fairly, consistently, and reasonably, taking into account the needs of vulnerable pupils and of those with SEND. The motivations behind bullying behaviour will also be considered in order to assess whether it reveals any concern for the well-being or safety of the perpetrator (see *Support for Pupils who are bullied* below). For example, if an incident occurs because a pupil has retaliated after persistent bullying, the school will consider this as being different from an unprovoked attack.

Disciplinary penalties may include removal of “free” time, detention, or internal or external exclusion, including permanent exclusion in the most serious and/or persistent cases. In the case of cyber-bullying, they may also include the confiscation or regular monitoring of mobile phones or other such devices whilst in school and withdrawal of access to school ICT facilities in accordance with the school’s ICT Acceptable Use Policy.

If sanctions are considered appropriate, they apply regardless of whether bullying incidents occurred within or outside school. However, a teacher can only discipline a pupil on school premises and/or when the pupil is under the lawful control of the staff member (e.g. on a school trip).

Support for Pupils who are bullied

In all cases, the School recognises its responsibility to support children who are bullied and make appropriate provision for a child’s needs, whether this is a quiet word from the teacher, formal counselling (for older pupils), or the completion of an Early Help Assessment where appropriate.

There is a range of local or individual factors that may result in some children being more vulnerable to the impact of bullying, for example, children with SEND, adopted or looked-after children, children with health problems, young carers or children with any other protected characteristic.

In some circumstances, the consequences of bullying may lead to a child or young person experiencing pronounced social, emotional or mental health difficulties. While bullied children will not be routinely considered as requiring SEND support, the School will consider whether they should be assessed if this has not already taken place as some bullied children will have SEND difficulties.

School will do all it can to ensure that bullied children continue to attend. Where alternative provision is required, statutory guidance will inform the School's policy, and the aim will be to support reintegration back into mainstream education.

The following organisations may also provide advice and support:

- Bullying UK (Part of Family Lives) Helpline: 0808 800 2222
- National Bullying Helpline Tel: 0845 22 55 787 or nationalbullyinghelpline.co.uk
- Kidscape Parent's Helpline: 0207 823 5430 or kidscape.org.uk
- Childline Helpline: 0800 1111
- Kooth.com (an online mental well-being community)
- Bully Busters Helpline: 0800 169 6928
- The Mix Helpline (information and support for under-25s): 0808 808 4994
- Shout (part of the Diana Award): text 85258 or giveusashout.org
- Ditch the Label.org (for support with bullying, mental health, relationship and identity issues): ditchthelabel.org

Safeguarding Children and Young People

Under the Children Act 1989, a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. Keeping Children Safe in Education makes it clear that such abuse should never be tolerated or passed off as 'banter' or 'part of growing up'.

Child on Child Abuse

Peer-on-peer abuse occurs when a young person is exploited, bullied and/or harmed by their peers who are the same or similar age and where everyone directly involved is under the age of 18.

Child on Child Abuse may involve one or more of the following:

- Domestic Abuse;
- Child Sexual Exploitation;
- Harmful Sexual Behaviour;
- Serious Youth Crime / Violence including murder, rape and GBH between young people under-18.

Bolton School recognises that safeguarding issues can manifest themselves via peer-on-peer abuse and promotes a culture, described in the Foundation Safeguarding Policy and in this Anti-bullying policy, which is designed to minimise the risk of such abuse. Allegations are investigated thoroughly and, where appropriate, the School's Designated Safeguarding Lead or another member of the school staff will report any concern about peer-on-peer abuse to the local authority children's social care and work with them to take appropriate action. School recognises that the perpetrator

should also be supported and thought given to whether or not they may be in need of early help or additional support.

Criminal Law

Although bullying in itself is not a specific criminal offence in the UK, it is important to bear in mind that some types of harassing or threatening behavior or communications could be a criminal offence, for example under the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003, and the Public Order Act 1994. For example, under the Malicious Communications Act 1988, it is an offence for a person to send an electronic communication to another person with the intent to cause distress or anxiety or to send an electronic communication which conveys a message which is indecent or grossly offensive, a threat, or information which is false and known or believed to be false by the sender.

If school staff feel that an offence may have been committed, the police will always be informed.

Under the Education Act 2011, a staff member who has seized an electronic device such as a mobile phone or iPad is permitted (under the authority of the Head) to examine data/files and, if there is good reason to do so, to delete these. If an electronic device has been seized in accordance with school rules and the member of staff has reasonable ground to suspect that it contains evidence in relation to an offence, the member of staff must inform and give the device to the police as soon as is reasonably practicable. Material on the device that is suspected to be evidence relevant to an offence, or that is a pornographic image of a child or an otherwise extreme pornographic image, should not be deleted prior to giving the device to the police. If a staff member finds material that they do not suspect contains evidence in relation to an offence, they can decide whether it is appropriate to delete or retain the material as evidence of a breach of school discipline. In all such cases, the member of staff should speak to the relevant Deputy Head and/or Head before acting.

Appendix i

Senior Girls' Anti-Bullying Policy

Senior School staff will endeavour to make it easy for pupils to report bullying by ensuring that they are listened to and that incidents are acted on. Pupils are told that they can report bullying which may have occurred outside school, including cyber-bullying.

Staff are alert to words or actions which suggest that bullying is occurring, and must be vigilant in turning up for duty or lessons on time so that there is always adequate supervision in place to lessen the opportunities for unkind behaviour. All instances of bullying should be reported to the member of staff responsible for anti-bullying strategies, namely the Deputy Head (Pastoral) Mrs Green.

In dealing with the perpetrator, members of staff should make it clear that their behaviour is unacceptable and also stress the serious consequences of any subsequent repetition.

School should make clear to the parents of the victim and of the perpetrator the actions being taken, why we are taking them and what the parents can do to help us and to reinforce our actions.

Every effort should be made to follow up each case promptly to ensure that the victim is given immediate support and to prevent any recurrence.

A pupil being subjected to cyber-bullying will usually still have the texts or emails in question and should be encouraged to provide a copy of them.

Personal mobile phones and iPads belonging to pupils may be searched for evidence *with or without* the consent of the owner provided there is good reason to do so. "Good reason" is defined to mean that the school reasonably suspects that the data or files on the device have been or could be used to cause harm, disrupt teaching or break the School rules. The iPads provided by the School can be searched by the School at any time without consent.

Staff may raise particular issues or concerns during Tutor meetings, which are minuted. Copies of the minutes are sent to the Deputy Head (Pastoral).

Appendix ii

Girls' Division Policy on Youth-Produced Sexual Imagery (also known as Sexting)

Staff need to be particularly vigilant with regard to cyber-bullying (above), including 'Sexting'. Sexting is generally considered to be the 'sending or posting of sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' Creating and sharing sexual photos and videos of under-18s is illegal. In the following, 'Youth produced sexual imagery' is used to describe this practice because it implies young people sharing images that they, or another young person, have created of themselves and covers both still photos and moving videos.

The following should be kept in mind:

- The sharing of sexual imagery of people under the age of 18 *by adults* constitutes child sexual abuse and the School will always inform the police in such incidents;
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain imagery is covered by the School's Behaviour Management Policies, but is not dealt with below.

When an incident involving youth-produced sexual imagery comes to the School's attention, the following will take place:

- The incident will be referred to the Designated Senior Lead (DSL) (or, in her absence, in the Senior School, her Deputy) as soon as possible;
- The DSL will hold an initial review meeting with appropriate school staff;
- There may be subsequent interviews with the young people involved (if appropriate);
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm: Any decision not to inform the parents would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed. DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases DSLs may work to support the young people to inform their parents themselves;
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately;
- Any situations involving children under the age of 13 and youth-produced sexual imagery will be taken seriously as potentially being indicative of a wider safeguarding or child protection concern or as being problematic sexual behaviour. (The Sexual Offences Act of 2003 makes it clear that sexual activity with a child under the age of 13 is never acceptable, and that children of this age can never legally give consent to engage in sexual activity.) However, in some cases children under the age of 13 (and indeed older) may create youth-produced sexual imagery as a result of age-appropriate curiosity or risk-taking behaviour or simply due to naivety rather than any sexual intent. This is likely to be the behaviour more commonly identified within primary schools. Some common examples could include sending pictures of their genitals to their

friends as a dare or taking a photo of another child whilst getting changed for PE. Within this context it is unlikely that police or social care involvement is required or proportionate but the DSL will use her professional judgement to consider the specific context and the children involved;

- All incidents relating to youth-produced sexual imagery will be recorded in School. This includes incidents that have been referred to external agencies and those that have not.

The School recognises that disclosures about youth-produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, the DSL or any member of the school staff. The young person may report through an existing reporting structure, or a friend or parent may inform someone in school, or inform the police directly.

All members of staff (including non-teaching staff) are made aware of how to recognise and refer any disclosures of incidents involving youth-produced sexual imagery. This is covered within staff induction, in on-going training and is a part of the Foundation's Safeguarding and Child Protection Policy.

Any direct disclosure by a pupil in School will be taken very seriously. Staff will recognise that the pupil is likely to be embarrassed and worried about the consequences of such a disclosure.

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

- whether there is an immediate risk to a young person or young people;
- if a referral should be made to the police and/or children's social care;
- if it is necessary to view the imagery in order to safeguard the young person - in most cases, imagery will not be viewed;
- what further information is required to decide on the best response;
- whether the imagery has been shared widely and via what services and/or platforms, if this is known;
- whether or not immediate action should be taken to delete or remove images from devices or online services;
- any relevant facts about the young people involved which would influence risk assessment;
- if there is a need to contact another school, setting or individual;
- whether to contact parents or carers of the pupils involved - in most cases parents will be involved.

An immediate referral to police and/or children's social care will be made if at this initial stage one or more of the following features is apparent:

- i. The incident involves an adult;
- ii. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- iii. What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- iv. The imagery involves sexual acts and any pupil in the imagery is under 13;

- v. There is reason to believe a pupil or another child/young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

If, as a result of an internal investigation (below), the DSL believes there are wider issues which meet the threshold for children's social care involvement then she will make a referral in line with the Foundation's Safeguarding procedures.

If none of the above applies, then the School may decide to respond to the incident without involving the police or children's social care, although the School may choose to escalate the incident at any time if further information or concerns come to light. Such a decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and, if appropriate, local network of support.

This decision will be made by the DSL with input from the Head and, additionally, input from other members of staff if appropriate. The decision will be recorded in line with school policy. The decision will be based on consideration of the best interests of the young people involved and will take into account proportionality as well as the welfare and protection of the young people. The decision will be reviewed throughout the process of responding to the incident.

If a young person has shared imagery consensually, such as when in a relationship, or as a joke, and there is no intended malice, it may well be appropriate for the school to manage the incident directly. In contrast, any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, will generally be referred to police and/or children's social care. If there are any doubts about whether to involve other agencies, the DSL will make a referral to the police.

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks the following will be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the pupils involved?
- Do the pupils involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

If it is necessary to refer to the police, contact will be made through a PCSO (Police Community Security Officer), local neighbourhood police or by dialing 101. Once a

report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved. The School will be aware that, if the children involved are named or specifics are provided, the police are duty-bound to record and investigate all criminal activity reported. Any crime reference numbers provided will be recorded.

If any devices need to be seized and passed onto the police then the device(s) will be confiscated. The device will be turned off and stored securely until the police are able to come and retrieve it.

If the DSL is aware that children's social care are currently involved or have previously been involved with a young person involved in an incident of youth-produced sexual imagery, then she will contact children's social care.

In dealing with such issues, the School recognises that adults should not view youth-produced sexual imagery unless there is good and clear reason to do so. Wherever possible, responses to incidents should be based on what DSLs have been told about the content of the imagery. A decision to view imagery should be based on the professional judgement of the DSL and will always comply with the Safeguarding and Child Protection policy and procedures of the School. Imagery will never be viewed if the act of viewing would cause significant distress or harm to the pupil.

A decision would only be made to view imagery if the DSL were satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved);
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report;
- is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network.

If it is necessary to view the imagery then the DSL will:

- never copy, print or share the imagery, as this is illegal;
- discuss the decision with the Head
- ensure viewing is only undertaken by the DSL or another member of the safeguarding team with delegated authority from the Head
- ensure viewing takes place with another member of staff present in the room, ideally the Head or a member of the Senior Leadership Team - this staff member will not need to view the images;
- wherever possible, ensure viewing takes place on school premises, ideally in the office of the Head or a member of the Senior Leadership Team;
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery;
- keep a record of the viewing of the imagery in the school's safeguarding records, including who was present, why the image was viewed and any subsequent actions - this record will be signed and dated.

If youth-produced sexual imagery has been unavoidably viewed by a member of staff, either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring school systems), then the DSL will ensure that the staff member is provided with appropriate support, as viewing youth-produced sexual imagery can be distressing for both young people and adults and appropriate emotional support may be required.

If the School has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery. In most cases, the young person/young people will be asked to delete imagery and to confirm that they have deleted the imagery by a certain deadline.

The young people involved will be reminded that possession of youth-produced sexual imagery is illegal. They will be informed that, if they refuse to delete the image or it is later discovered they did not delete the image, they are committing a criminal offence and the police may become involved. All of these decisions, including times, dates and reasons for decisions made will be recorded and logged in the safeguarding records. Parents and carers will also be informed, unless this presents a further risk to the young person.

At this point, the School will normally invoke its own disciplinary measures to discourage young people from sharing, creating or receiving images. For the avoidance of doubt, parents and pupils are advised that there may be differences in policies and procedures regarding this and other behavioural issues between different schools within the Girls' Division (because of the age and stage of the children) and between schools in the Girls' Division and the Boys' Division, as well as between this school and other educational institutions. The Girls' and Boys' Divisions have a single Governing Body but separate DfE registrations and are inspected separately. The Girls' Division has its own Behaviour Management and Discipline Policy and each school in the Girls' Division has its own policy for Rewards and Sanctions. If, on the balance of probabilities, it is found that there has been a breach of discipline, the member of staff in charge of dealing with the matter will apply the sanction which is judged appropriate within the context of the relevant school and the particular circumstances, regardless of any sanctions applied elsewhere within the Foundation or at any other institution for the same or similar offences.

In seeking to prevent Sexting, the School will:

- educate children and young people about youth-produced sexual imagery in an age-appropriate way, particularly as part of the THRIVE programme and in ICT lessons;
- speak to parents of pupils (as appropriate for their year group) about the dangers of sexting and the law concerning youth-produced sexual imagery;
- advise children that they can talk to a ChildLine counsellor 24 hours a day about anything that is worrying them by ringing 0800 11 11 or in an online chat at <http://www.childline.org.uk/Talk/Chat/Pages/OnlineChat.aspx>;

- advise parents or carers who are concerned that their child is being contacted by adults as a result of having shared sexual to report to CEOP at www.ceop.police.uk/safety-centre;
- advise parents and carers who are concerned about their child to contact the NSPCC Helpline by ringing 0808 800 5000, by emailing help@nspcc.org.uk or by texting 88858. (Lines open Monday to Friday 8am – 10pm or 9am – 6pm at the weekends).