



Bomere and the XI Towns Federation

A STATEMENT OF POLICY Child Protection

The following policy follows discussion with governors, parents and pupils and should be read in conjunction with other relevant policies and the school prospectus. It is based on LA guidance.

Date; September 2016

Working Together To Safeguard Children 2015 & Keeping Children Safe in Education 2016

Bomere and the XI Towns Federation Safeguarding and Child Protection Policy (Updated September 2016)

(St John the Baptist CE Primary School, Ruyton XI Towns and Bomere Heath CE Primary School, Bomere Heath)

This policy was written: 1st September 2016 with an update on 31st March 2017

It was adopted on: 24th November 2016

It is due for review in twelve months on: 24th November 2017

Other policies that need to be taken into account are:

- anti-bullying and discrimination
- **PSHE**
- drugs
- confidentiality
- behaviour and attendance
- SEND
- health and safety
- safe recruitment
- managing allegations
- physical intervention
- E-safety
- · management of allegations
- intimate care
- touching
- use of mobile phones and cameras
- Staff conduct policy (Code of Conduct)
- Medical Needs
- Staff conduct policy (Code of Conduct)
- Whistle Blowing
- Preventing Radicalisation and Extremism in Schools(part of this policy)

This policy reflects current legislation, accepted best practice and complies with the government guidance: Working Together to Safeguard Children (WT) March 2015 and Keeping Children Safe in Education (KCSIE) September 2016

Important contact details

The Designated Safeguarding Lead (DSL)

Julie Ball

Deputy Designated Safeguarding Lead (DSLs) Stuart Field

Stephanie Henney Kirsty Foulkes

Safeguarding and child protection link governor Claire Vuckovic/Colin Case

Looked after children (LAC) link governor Lisa Holland

If concerned about a child or behaviour of an adult phone Shropshire Council Dedicated Safeguarding Line

First Point of Contact (FPOC) (Compass and Initial Contact Team) 0345 678 9021

Designated Officer in the Local Authority – LADO 0345 678 9021

lado@shropshire.gov.uk

Shropshire Out of hours Emergency Duty Team 0345 678 9040

Public Protection Unit (West Mercia Police) 0300 333 3000

Police Emergency 999

Police Non-emergency 101

Childline: 0800 1111

http://www.safeguardingshropshireschildren.org.uk/scb/

Introduction

At the schools within the Bomere and the XI Towns Federation, the governors and staff fully recognise the contribution the school makes to safeguarding children. We recognise that the safety and protection of all pupils is of paramount importance and that all staff, including volunteers, have a full and active part to play in protecting pupils from harm. We believe that the schools should provide a caring, positive, safe and stimulating environment which promotes all pupils' social, physical, emotional and moral development

We recognise that ultimately, effective safeguarding of children can only be achieved by putting children at the centre of the system, and by every individual and agency playing their full part, working together to meet the needs of our most vulnerable children in line with Working Together 2015 and Keeping Children Safe In Education (KCSIE) 2016

The aims of this policy are to:

- Ensure that the pupils' development is supported in ways that will foster security, confidence and independence.
- Raise the awareness of teachers, non-teaching staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse
- Confirm the structured procedures to be followed by all members of the schools' community in cases of suspected harm or abuse.
- Emphasise the need for good levels of communication between all members of staff and those with designated responsibility for child protection, health and safety and other safeguarding responsibilities.
- Emphasise the appropriate safeguarding and child protection policies, procedures and arrangements of those service providers who use the school's premises through extended schools or provide any other before and after school activities

This policy will have consideration for, and be in compliance with, the following legislation, statutory guidance and key information

- 'Keeping Children Safe in Education' statutory guidance for schools and colleges,
 2016 Department for Education (DfE)
- Shropshire Safeguarding Children Board (SSCB) online procedures
- Working Together to Safeguard Children' 2015
- The "Prevent" Duty July 2015
- Shropshire Safeguarding Children Board (SSCB) Threshold Guidance Document
- Ofsted Common 'Inspection framework: safeguarding in maintained schools and academies' September 2015
- Early Years Foundation Stage Statutory Framework (EYFS) 2014

Responsibilities

i. The governing body:

- Has a trained link governor(s) appointed for safeguarding and child protection (Claire Vuckovic – training undertaken Spring 2014) and looked after children (LAC) (Lisa Holland) who will attend training/updates every three years.
- A member of the governing body is nominated to liaise with the local authority and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the head teacher.

- Ensures the school has a safeguarding and child protection policy and staff behaviour policy which should include amongst other things staff/pupil relationships and communications including the use of social media.
- Ensures that the schools create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children (Part three: Safer Recruitment. Keeping Children Safe in Education 2016). Also, they ensure that procedures for dealing with allegations against staff and volunteers are in accordance with Shropshire Safeguarding Children Board (SSCB) are followed.
- Will ensure that at least one member of an appointed panel will have attended safer recruitment training.
- Will appoint a member of staff of the schools' leadership team is appointed to the role of DSL.
- The school keeps a single central record that as a minimum evidences the following:

All staff have been employed in compliance with safer recruitment requirements (Part three KCSIE 2016)

- Date of employment
- Identity confirmed with date
- Qualifications checked with date
- Prohibition from teaching check with date (for teaching staff)
- Barred list check with date
- Enhanced Disclosure and Barring Service (DBS) check with date
- Eligibility to work in the UK with date
- Checks confirmed by and date
- The adequacy of resources committed to child protection, and the staff and governor training profile is regularly monitored.
- Recognises that neither it, nor individual governors, have a role in dealing with individual cases or have a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against staff)
- Will ensure this child protection policy is available to parents on request and that this
 policy and practice complements other policies e.g. anti-bullying (including cyberbullying, peer on peer abuse, health and safety, drug,) to ensure safeguarding.

Professional development

The governors will ensure that:

- All staff and volunteers who work with pupils aged up to 18 years have appropriate child protection training that equips them to recognise and respond to pupil welfare concerns.
- Staff are provided with mandatory induction, to include familiarisation with the safeguarding and child protection policy, staff behaviour policy, the DSL in the school, their responsibilities and the procedures to be followed.
- all staff read at least part one of KCSIE 2016,
- They monitor when and how often child protection and safeguarding training (including multi-agency training) that has been undertaken by staff and governors within the last three years to ensure their knowledge and skills are current.

All of the above needs to be reported to governors in the form of:

- A report of the school's training needs assessment presented to the governors annually so that they can ensure that training is appropriately provided for all staff.
- A training register kept to indicate when staff and governors have been trained including safer recruitment and this will in turn inform the *annual* report to governors.

ii. The head teacher will ensure that:

- The policies and procedures adopted by the Governing Body are followed by all staff.
- The policy is updated annually, and be available publicly via the school website or by other means.
- DSLs review the six monthly updates of the SSCB procedures.
 - Sufficient resources and time are allocated to enable the DSL, deputy DSL's and other staff to discharge their responsibilities including taking part in strategy discussions and other multi-agency meetings, to contribute to the assessment and support of children and young people, and be appropriately trained.
- A list of all staff and volunteers, and their safeguarding training dates is maintained.
- All staff and volunteers feel able to raise their concerns about poor and unsafe practice in regard of pupils, and that such concerns are addressed in a timely manner in accordance with agreed policies.
- she undergoes child protection training which is updated regularly, in line with advice from the LSCB
- Allegations against the Head teacher

Where an allegation is made against the Headteacher or principal this should be referred to the chair of governors, as well as the LADO.

The role of the chair of governors, for Safeguarding Child Protection shall include:

 Monitoring of procedures relating to liaison with the LADO, Children's Social Care and the Police in relation to any allegations of child abuse made against the Head teacher, including attendance at relevant meetings.

They will:

- Have their roles explicitly defined in their job descriptions.
- Be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively.
- Ensure DSL and deputies undergo updated child protection training every two years.
- Liaise in accordance with the SSCB procedures when referring a pupil where there are concerns about possible abuse or harm.
- Contact the LADO where there are concerns about a member of staff being involved in allegations of abuse or harm.

- Be able to access the contents of the SSCB procedures and Personnel procedures (on Shropshire Learning Gateway) updated and make these accessible to all staff
- Ensure all staff, including supply teachers, visiting professionals working with pupils in the school and volunteers are informed of the names and contact details of the DSL and deputies and the school's procedures for safeguarding children.
- Support staff who attend strategy meetings and/or case conferences
- Support staff and volunteers who may find safeguarding issues upsetting or stressful by enabling them to talk through their anxieties and to seek further support from the school leadership group or others as appropriate.
- Ensure involvement of other lead professionals e.g. where there are concerns about any pupil including those who are LAC.

They will also ensure that:

- Written records of concerns are kept, even if there is no immediate need for referral;
 and monitored using the Early Help Assessment Framework (EHAF)
- All child protection records are marked as such and kept securely locked, and if these
 are stored electronically, that they are differently password protected from the pupils'
 other files, and accessible only by the headteacher/DSL
- Pupil records are kept separately, and marked as appropriate to indicate other confidential records are being held elsewhere
- All absence letters are dated and clearly signed by a teacher/head/deputy, and that if: there are concerns about attendance and a pupil's wellbeing and safety, the Education Welfare Officer is contacted
- If he pupil has a Child Protection Plan, and is absent without explanation for two days, their key worker in Safeguarding is contacted.
- Phone calls in relation absences are similarly logged and dated.
- Records are monitored for patterns of absence and appropriate action is taken.
- Where there are existing concerns about a pupil, and they transfer to another school in this authority, the information held e.g. an EHAF is forwarded under confidential cover and separate from the pupil's main file to the DSL for child protection in the receiving school.
- Where a pupil has a child protection plan and transfers to another school or college; or to the Social/Children's Services within a new authority or if the pupil is transferring to a school in another authority which has not yet been identified.
 - The DSL of the new school/college is informed immediately.
 - Their child protection file is transferred as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Prevention in the Curriculum

- Our schools recognises the importance of developing pupils' awareness of behaviour that is unacceptable towards them and others, and how they can help keep themselves and others safe.
- The PSHE programme *in each key stage* provides personal development opportunities for pupils to learn about keeping safe and who to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, pupils are taught to, for example:
 - Safely explore their own and others' attitudes.
 - Recognise and manage risks in different situations and how to behave responsibly.
 - Judge what kind of physical contact is acceptable and unacceptable.
 - Recognise when pressure from others (including people they know) threatens their personal safety and well-being and develop effective ways of resisting pressure;
 - including knowing when and where to get help.

- Use assertiveness techniques to resist unhelpful pressure.
- The importance of Internet safety

iii. All staff, teaching and non-teaching, volunteers and others working in school must:

- Be aware that to safeguard children, they have a duty to share information with the DSL and through the DSL, with other agencies.
- Always speak to the DSL. In exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children's social care.
- Be alert to signs and symptoms of harm and abuse (highlighted in Part 1, KCSIE)
- Know how to respond to their duty when they have concerns or when a pupil discloses to them and to act
- Know what and how to record concerns.
- All staff members should undergo child protection training which is updated regularly, in line with advice from the SSCB. (Whole staff training every three years)
- Maintain an attitude of 'it could happen here'

Reporting concerns to the designated leads: Any concern should be discussed in the first instance with one of the designated leads or in their absence the head teacher, as soon as possible. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral.

Immediate response when a pupil discloses:

It is vital that our actions do not abuse the pupil further or prejudice further enquiries, All staff will:

- Listen to the pupil, if you are shocked by what is being said, try not to show it.
- It is OK to observe bruises but not to ask a pupil to remove their clothing to observe them.
- If a disclosure is made:
 - Accept what the pupil says.
 - Stay calm, the pace should be dictated by the pupil without them being pressed for detail by asking leading questions such as "what did s/he do next?" It is our role to listen not to investigate.
 - ❖ Use open questions such as "is there any thing else you want to tell me?" or "yes?" or "and?"
 - ❖ Be careful not to burden the pupil with guilt by asking questions like "why didn't you tell me before?"
 - Acknowledge how hard it was for the pupil to tell you.
 - Do not criticise the perpetrator, the pupil might have a relationship with them
 - Do not promise confidentiality. Reassure the pupil that they have done the right thing, explain whom you will have to tell (the DSL) and why; and, depending on the pupil's age, what the next stage will be. It is important that you avoid making promises that you cannot keep such as "I'll stay with you all the time" or "It will be all right now".

Recording information

- Make some brief notes at the time or immediately afterwards; record the date, time, place and context of disclosure or concern, facts and not assumption or interpretation.
- If it is observation of bruising or an injury try to record detail, e.g. "right arm above elbow". Alternatively use a 'body map' to indicate which area of the body has injuries/bruises. Do not take photographs
- Note the non-verbal behaviour and the key words in the language used by the pupil (try not to translate into 'proper terms').

It is important to keep these original notes and pass them on to the DSL who may ask you to write a referral.

Supporting pupils

- The staff and governors recognise that a child or young person who is abused or witnesses violence may find it difficult to develop and maintain a sense of self worth. We recognise that in these circumstances pupils might feel helpless and humiliated, and that they might feel self blame.
- We recognise that this school might provide the only stability in the lives of pupils who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a pupil in these circumstances might range from that which is perceived to be normal to aggressive or withdrawn.
- The school will support all pupils by:
 - Discussing child protection cases with due regard in order to safeguard the pupil and his or her family.
 - Supporting individuals who are or thought to be in need or at risk in line with SSCB procedures.
 - Encouraging self-esteem and self-assertiveness.
 - Challenging and not condoning aggression, bullying or discriminatory behaviour.
 - Promoting a caring, safe and positive environment.
 - Gaining access to an interpreter if required to ensure the voice of the child is heard.

Confidentiality

- A pupil's views will be considered by the DSL in deciding whether to inform the pupil's family, particularly where the pupil is sufficiently mature to make informed judgements about the issues, and about giving consent for information sharing.
- The personal information about all pupils' families is regarded by those who work in this school as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality.
- Staff understand that they need know only enough to prepare them to act with sensitivity to a pupil and to refer concerns appropriately. The DSL and head teacher will disclose information about a pupil to other members of staff on a need to know basis only. It is inappropriate to provide all staff with detailed information about the pupil, the incident, the family and the consequent actions.

Staff must ... be aware that:

- They cannot promise a pupil complete confidentiality instead they must explain that they may need to pass information to other professionals to help keep the pupil or other pupils safe.
- Where there are concerns about a pupil's welfare, relevant agencies need to be involved at an early stage. If a member of staff or a volunteer has concerns about a pupil's welfare, of if a pupil discloses that s/he is suffering abuse or reveals information that gives grounds for concern, the member of staff should speak to their DSL with a view to passing on the information.

Working with parents/carers

- Parents and carers play an important role in protecting their children from harm.
- In most cases, the school will discuss concerns about a pupil with the family and, where appropriate, seek consent to making contact with Compass regarding concerns for the welfare or protection of children.
- The school aims to help parents understand that the school, like all others, has a duty to safeguard and promote the welfare of all pupils. The school may need to share information and work in partnership with other agencies when there are concerns about a pupil's welfare.

 The pupil's views will be considered in deciding whether to inform the family, particularly where the pupil is sufficiently mature to make informed judgements about the issues, and about consenting to that.

"Children want to be respected, their views to be heard, to have stable relationships with professionals built on trust and for consistent support provided for their individual needs. This should guide the behaviour of professionals. Anyone working with children should see and speak to the child; listen to what they say; take their views seriously; and work with them collaboratively when deciding how to support their needs". WT 2015

 The governors include the above paragraph on the school website where parents can access links to all relevant policies

Specific safeguarding issues:

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect (Annex A). Staff are made aware of specific safeguarding issues (listed below) through child protection training, reading up to date guidance such as Keeping Children Safe in Education July 2016 and accessing SSCB procedures at http://www.safeguardingshropshireschildren.org.uk.

Schools are to ensure that the DSL is continually updated in all areas below. They must be familiar with the referral pathways and specific toolkits and guidance available on the SSCB website.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. Keeping Children Safe in Education 2016, lists a range of specific safeguarding issues, these are encompassed in Shropshire Safeguarding Children Board Procedures, within section 2 (Children in Specific Circumstances)

http://westmerciaconsortium.proceduresonline.com/chapters/contents.html?zoom_highlight=specific+safeguarding#safe

School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites.

- Bullying including cyberbullying
- Children missing education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental health
- Missing children and adults strategy
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sexting
- Trafficking

Protecting children from radicalisation "Prevent Duty"

- Our schools promote tolerance and harmony between different cultural traditions; we teach a broad and balanced curriculum which promotes the spiritual, moral and cultural development of pupils and prepares them for the opportunities, responsibilities and experiences of life. The schools promote community cohesion and safeguard against biased or unbalanced teaching and the promotion of partisan political views and ensure that when political or controversial issues are brought to pupils' attention, they are offered a balanced presentation of opposing views.
- Government guidance on radicalisation is followed; a link to the "Prevent" government strategy is available on Shropshire Learning Gateway

Peer on Peer Abuse

Staff should recognise that children are capable of abusing their peers. Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Victims of peer abuse should be supported as they would be if they were the victim of any other form of abuse, in accordance with this policy.

Peer on peer abuse occurs when a young person is exploited, bullied and/or harmed by their peers who are the same age or similar age. Peer-on-peer abuse can relate to various forms of abuse (not just sexual abuse and exploitation, some forms of peer on peer abuse are:

Sexting

Sexting is when someone sends or receives a sexually explicit text, image or video.

This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care,

parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

It is vital that staff at Bomere and the XI Towns Federation understand that the child who is perpetrating the abuse may also be risk of harm. Staff should make every effort to ensure that the perpetrator is also treated as a victim and undertake assessments to conclude this. Sensitive work must be undertaken with the child who is perpetrating, by helping them to understand the nature of their behaviour and the effect it has on others may prevent abuse as a whole.

Staff must be able to use their professional judgement in identifying when what may be perceived as "normal developmental childhood behaviour" becomes abusive, dangerous and harmful to others. Designated leads may need to consult with the SSCB Threshold document to help with their decision making.

Safeguarding children with special educational needs and disabilities

It is recognised that children with special educational needs or disabilities (SEND) can present additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration; children with SEND can be disproportionately impacted by issues such as bullying, without necessarily showing outward signs; communication barriers.

It is important, therefore, to be particularly sensitive to these issues when considering any aspect of the welfare and safety of such children, and to seek professional advice where necessary.

Safeguarding children who are Looked After

KCSiE 2016 has been amended to reflect the importance of the designated teacher working with the virtual school head on how funding can best support the progress of a Looked After Child.

Whole School Child Protection Policy and Templates

The designated safeguarding lead should have details of the child's social worker and the name of the virtual head. The designated safeguarding lead should work closely with the designated teacher. The designated teacher will ensure that the educational achievement of children who are looked after is promoted and this person must have appropriate training.

The appointment of a designated teacher is a statutory requirement for governing bodies of maintained schools and proprietors of academies. KCSiE is clear that in other schools and colleges an appropriately trained teacher should take the lead therefore it would be good practice on other schools to have a designated teacher for Looked After Children.

Children Missing Education

Our schools have in place appropriate safeguarding responses to ensure effective recording of children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or Child Sexual Exploitation (CSE) and to help prevent the risks of their going missing in future. Detailed risk assessments are to be completed as appropriate i.e SSCB Child Sexual Exploitation Guidance for practitioners; Appendices 1 and 2 (Risk Identification form).

Mobile Phones and Cameras in Early Years and Foundation Stage: The purpose and Importance of Mobile Phone/Smart Device and Camera Policy

Our governors recognise that staff may need to have access to mobile phones on site during the working day. However, there have been a number of queries raised within the local authority and nationally regarding the use of mobile phones and other devices in educational settings.

The concerns are mainly based around these issues:

- Staff being distracted from their work with children
- The use of mobile phones around children
- The inappropriate use of mobile phones

Ensuring the Safe and Appropriate Use of Mobile Phones

Bomere and the XI Towns Federation allows staff to bring in mobile phones for their own personal use. However, they must be kept in out of the reach of children and parents, in a secure area accessible only to staff and are not allowed to be used in the toilets, changing rooms or in the play areas at anytime. If staff fail to follow this guidance, disciplinary action will be taken in accordance to our school staff code of conduct. If staff need to make an emergency call, they must do so either in the main or headteachers office. Staff must ensure that there is no inappropriate or illegal content on the device.

Mobile phone technology may not be used to take photographs anywhere within the school grounds. There are digital cameras and tablets available within the school and only these should be used to record visual information within the consent criteria guidelines of the local authority and the school.

Members of staff may only contact a parent/carer on school approved mobile phones. Pupils should not use mobile phones within the school grounds and should not bring in a mobile.

Use of Mobile Phones for Volunteers and Visitors

Upon their initial visit volunteers and visitors are given information informing them they are not permitted to use mobile phones on the premises. If they wish to make or take an emergency call they may use either the main or the manager's office. Neither are volunteers or visitors permitted to take photographs or recordings of the children without the headteachers permission. Visitors, including parents, are requested not to use their mobile phones on the premises or on school visits and are asked to switch them off or hand them in at reception.

Important contact details of the children are kept in the school office.

- We believe that photographs validate children's experiences and achievements and are a valuable way of recording milestones in a child's life.
- Parental permission for the different ways in which we use photographs is gained as part of the initial registration at school.
- We take a mixture of photos that reflect the school environment, sometimes this will be when children are engrossed in an activity either on their own or with their peers.
- Children are encouraged to use the camera to take photos of their peers.
- In order to safeguard children and adults and to maintain privacy, cameras are not to be taken into the toilets by adults or children.
- All adults whether teachers/practitioners or volunteers understand the difference between appropriate and inappropriate sharing of images. All images are kept securely in compliance with the Data Protection Act