

Western Education and Library Board

**REPORT ON THE INVESTIGATION
INTO ISSUES ARISING FROM THE
SPARKLEBOX CASE**

Supporting Learning

24 March 2010



**WESTERN EDUCATION
& LIBRARY BOARD**

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Section 1 - EXECUTIVE SUMMARY

1.1 Background

- 1.1.1** On 10 February 2010 the Department of Education (DE) contacted the Western Education and Library Board (WELB) Chief Executive Mr Barry Mulholland, instructing that WELB investigates comprehensively the issues surrounding the Sparklebox case and the actions of C2K.
- 1.1.2** C2k is funded by the Department of Education and managed by the Western Education and Library Board. C2k works with a wide range of partners from both private and public sectors to deliver an integrated and supported service to schools; installed, maintained and upgraded by specialist providers.
- 1.1.3** Sparklebox is a widely used website that provides curriculum resources for teachers. It would appear that Sparklebox can generate income via advertising on its website determined by the number of hits on the site. It has recently emerged that the former owner of Sparklebox was jailed for a second time in England on 8 January 2010 having been found guilty of possessing indecent images of children. C2K subsequently blocked access to the site via the C2K network with effect from 1 February 2010.
- 1.1.4** The Minister issued Terms of Reference for the investigation which centred around seven key areas, including:
- Actions of C2K
 - C2K Protocols, Procedures and Processes in Respect of Child Protection
 - C2K Reporting Procedures to DE in Respect of Child Protection
 - Potentially Harmful Content or Interactive Elements of Sparklebox
 - Use by Schools in the North of Ireland
 - Informing Service Providers and Users
 - Recommendations
- 1.1.5** The WELB Chief Executive set up an Investigation Team comprised of officers from Corporate Services and Internal Audit, reporting to a member of Senior Management. An external quality assurance was conducted on the investigation process by the Head of Internal Audit from the North Eastern Education and Library Board.

1.2 Actions of C2K

- 1.2.1** On becoming aware of the Sparklebox issue, on 17 December 2009, C2K conducted an immediate investigation of the Sparklebox website and confirmed that no inappropriate material or functionality, which would be potentially harmful to children, was accessible through the C2K network. Whilst the Sparklebox

website included a facility for uploading photographs, an email facility and a live blog, C2K's web filtering system ensured that none of this interactivity was accessible by schools at any time via the C2K network. All interactive elements of the website were linked through a toolbar which was blocked by default on the C2K network.

- 1.2.2** Given this and the significant levels of usage by schools, C2K took a decision not to block the Sparklebox site. C2K always considered the safeguarding of children as critical and would have blocked the site immediately if there was any evidence that children would be in danger by using the C2K network. C2K continuously monitored the Sparklebox situation and sought and shared updated information, from BECTA, CEOP and the National Education Network, with members of the C2K Management Board, who considered the available information at their meetings of 21 December 2009, 11 January 2010 and 25 January 2010.
- 1.2.3** Once aware of the parental complaint regarding Sparklebox, on 28 January 2010, the C2K Management Board reviewed the position and decided to block the site, with effect from 1 February 2010, on moral grounds, based on new thinking beyond existing risk assessment criteria. Although the Sparklebox website, as accessed via the C2K network and in line with Internet Watch Foundation (IWF) standards, was inherently safe and carried no child protection risk in terms of material and functionality, it had caused upset to a parent. C2K recognised that schools, parents and children may not wish to be perceived as endorsing use of a site whose owner/operator was found guilty of possessing indecent images of children.
- 1.2.4** C2K's decision to block the site at this stage was based on the unique situation presented by the Sparklebox case, including: C2K did not wish to be perceived as endorsing the Sparklebox website; C2K did not wish to be perceived as supporting the former operator of Sparklebox in generating an income, and similar resources are available to schools on other sites.

1.3 Protocols, Procedures and Processes in respect of Child Protection

- 1.3.1** Assessment of C2K's actions would indicate that C2K's response to the Sparklebox issue fully complied with their existing protocols, procedures and processes, in line with IWF standards.
- 1.3.2** The C2K internet filtering system ensured that none of the interactive elements of the Sparklebox website were accessible by schools at any time via the C2K network. C2K refers to advice from BECTA with regard to filtering of websites in schools in terms of the categories of websites which should not, by default, be available to schools. From the evidence provided, C2K's web filtering system complies with the Internet Watch Foundation (IWF), an organisation based in the UK whose mission is to minimise the availability of illegal online content.

Websense has access to the IWF's list of sites classified as containing 'potentially illegal content'.

- 1.3.3** A number of weaknesses in the overall communications process resulted in a delay in communication of the Sparklebox issue to C2K and other RBCs. Also, C2K did not have specific guidance in place for dealing with the new moral territory presented by the Sparklebox issue.
- 1.3.4** As the C2K Management Board, based on assessment in line with IWF standards, determined that the Sparklebox website, as accessible on the C2K network, had no interactive elements that would put children using the site at risk, they did not seek advice from local sources such as the DE, Joint Legal Service and WELB Child Protection Service regarding the Sparklebox issue.
- 1.3.5** Clear guidance is not available from any source in relation to criteria for cessation of website usage in relation to criminal convictions of those affiliated to websites.
- 1.3.6** Despite the fact that the Sparklebox site was blocked on the C2K network, C2K had no powers to prevent teachers from accessing the site from home or elsewhere and bringing materials into school.
- 1.3.7** C2K has taken a number of measures to ensure Child Protection is integral to all aspects of service delivery. As no web filtering system is infallible, C2K provides training and guidance to schools in relation to local precautions and the responsibilities of schools, teachers, parents and pupils in respect of e-safety and Child Protection.
- 1.3.8** C2K actively supports the development of e-safety good practice within educational organisations; has subscribed to a number of forums that promote e-safety good practice, and actively pursues BECTA accreditation.

1.4 C2K Reporting Procedures to DE in Respect of Child Protection

- 1.4.1** Normal Board procedures for reporting specific Child Protection issues are via the Board's Child Protection Support Service for Schools (CPSSS) and, if appropriate, the Police and Social Services. There are no formal reporting procedures between the Boards and DE in relation to specific Child Protection issues. The, DE led, DOCPEG Group (Designated Officers for Child Protection Education Group) which meets on a monthly basis provides strategic direction in relation to child protection policy, practice and training within education at a regional level.

1.5 Potentially Harmful Content or Interactive Elements of Sparklebox

- 1.5.1** None of the interactive elements of the Sparklebox website were accessible to schools via the C2K network, and therefore posed no risk to children. C2K conducted a risk assessment of the Sparklebox site and continuously monitored advice regarding use of the site. Although the accessible elements of the Sparklebox website were considered safe and of no risk to children, C2K ultimately blocked the site because it did not wish to be perceived as endorsing the Sparklebox website; did not wish to be perceived as supporting the former operator of Sparklebox from generating an income, and similar resources are available to schools on other sites.

1.6 Use by Schools in the North of Ireland

- 1.6.1** The statistics on usage of the Sparklebox site by schools, via the C2K network, reveal significant levels of usage; 953 schools represents just over 70% of Northern Ireland schools. These figures do not include access to the Sparklebox site by teachers via routes other than the C2K network, such as from home.

1.7 Informing Service Providers and Users

- 1.7.1** This Report and recommendations offer useful information on and lessons learned from the Sparklebox experience, which should be made available to other relevant bodies.

1.8 Recommendations

- 1.8.1** The Sparklebox website, as accessed via the C2K network, was inherently safe and carried no child protection risk in terms of material and functionality. C2K always considered the safeguarding of children as critical and would have blocked the site immediately if there was any evidence that children would be in danger by using the C2K network. The following recommendations are being made to further enhance the safety of children accessing or downloading information from the internet. There are a total of 14 recommendations emanating from the investigation.

1.9 Recommendations for C2K

- 1.9.1** C2K should review its standard operating procedures and risk assessment criteria to deal with unique issues such as Sparklebox, which lie outside C2K's normal escalation processes and are of a moral nature. This should provide clear instruction on how C2K should consult, manage and communicate,

including a requirement that the C2K Management Board should seek immediate advice from local sources such as the Joint Legal Service, WELB Child Protection Service and DE **(Ref: 4.3.1 / 4.3.6 / 4.3.9)**.

- 1.9.2** C2K should continue to work with the WELB Child Protection Service to review the suitability of provision of training and guidance to schools in relation to local precautions and the responsibilities of schools, teachers, parents and pupils in respect of e-safety and Child Protection **(Ref: 4.3.4)**.
- 1.9.3** C2K should continuously monitor and take account of new guidance from DE and other sources in relation to e-safety and Child Protection **(Ref: 4.3.6 / 4.3.9)**.
- 1.9.4** In future, in dealing with unique issues such as Sparklebox, C2K should consider immediately blocking the website pending further discussion with DE, Joint Legal Service and WELB Child Protection Service **(Ref: 4.3.6 / 4.3.9)**.
- 1.9.5** C2K should identify a designated officer with responsibility for e-safety Child Protection issues. **(Ref: 5.3.2)**.
- 1.9.6** C2K should maintain a register of blocked websites which should be reported, for review, quarterly to the C2K Management Board and annually to the C2K Project Board **(Ref: 5.3.3)**.

1.10 Recommendations for DE

- 1.10.1** DE should request that the relevant national bodies conduct a review of current arrangements for the reporting of and flow of information from/to RBCs including: channels of communication; statutory responsibilities, and advice on actions which should be taken. Implementation of formal reporting arrangements should be considered e.g. one appointed body acting as interagency contact point for dissemination of such information **(Ref: 3.3.1 / 3.3.2 / 3.3.3)**.
- 1.10.2** DE should consider developing and issuing clear guidance and protocols regarding the use of materials and resources in the classroom from websites blocked by C2K as such websites can be accessible from non C2K machines and from home **(Ref 3.3.10)**.
- 1.10.3** DE should consider issuing clear guidance recommending the removal of all Sparklebox related materials and resources from schools and from all non C2K computers located in schools **(Ref 3.3.10)**.
- 1.10.4** DE should request that the relevant national bodies consider developing and issuing clear guidance and protocols regarding the use of websites found to be designed, owned or operated by individuals found guilty of offences against children **(Ref 3.3.11)**.

1.10.5 DE should consider making this Report and recommendations available to other relevant bodies (e.g. RBCs, Local Authorities, BECTA and CEOP) in order to share lessons learned from the Sparklebox experience (**Ref 8.3.1**).

1.11 Cross-cutting Recommendations

1.11.1 The Inter Departmental Group on Safeguarding should consider developing a communication strategy detailing a sensible and practicable reporting mechanism for 'child protection' issues to DE. Clarification is required from DE as to when and how such issues should be reported (**Ref: 5.3.1**).

1.11.2 The Inter Departmental Group on Safeguarding should develop criteria for identifying and categorising e-safety 'child protection' issues (**Ref: 5.3.3**).

1.11.3 Elements of this Report and recommendations, as well as guidance from the Inter Departmental Safeguarding Group, should inform future e-safety training and guidance to schools, teachers, parents and pupils in order to share lessons learned from the Sparklebox experience (**Ref 8.3.1**).

Section 2 - INTRODUCTION

2.1 Background

- 2.1.1** On 10 February 2010 the Department of Education (DE) contacted the Western Education and Library Board (WELB) Chief Executive Mr Barry Mulholland, instructing that WELB investigates comprehensively the issues surrounding the Sparklebox case and the actions of C2K (**Appendix I: DE Letter and Report Terms of Reference**).
- 2.1.2** C2k is funded by the Department of Education and managed by the Western Education and Library Board. C2K works with a wide range of partners from both private and public sectors to deliver an integrated and supported service, installed, maintained and upgraded by specialist providers. The investment in ICT over the last 9 years through C2K has made Northern Ireland unique in the UK in having a single managed service across all schools.
- 2.1.3** C2k delivers to schools high quality, sustainable infrastructure, connectivity and resources which meet strategic targets. Grant-aided schools receive, at no cost to themselves, a core entitlement, based on pupil numbers, including:
- an infrastructure of 65,000+ desktops and laptops connected to the Internet and linked to legacy systems;
 - access to a wide range of content and services to support the Northern Ireland Curriculum and the professional development of teachers;
 - an integrated suite of services for school administration and management;
 - connection of schools' networks into a single education network across Northern Ireland, with tools to facilitate the development of on-line teaching and learning, and
 - full service support through a central help desk.
- 2.1.4** Sparklebox is a widely used 'public access' website that provides curriculum resources for teachers. The resources are mostly in the form of printable or interactive worksheets that can be downloaded by the teacher and then made available to pupils either as printed copies or on a whiteboard. Sparklebox is freely available on the World Wide Web and elements of the site were accessible via the C2K network. At no time was any public money spent on the Sparklebox website. It would appear that Sparklebox can generate income via advertising on its website determined by the number of hits on the site.
- 2.1.5** It has recently emerged that the former owner of Sparklebox was jailed for a second time in England on 8 January 2010 having been found guilty of possessing indecent images of children. C2K subsequently blocked access to the site via the C2K network with effect from 1 February 2010.
- 2.1.6** The Department of Education requested that WELB establishes the full facts of the case, and makes recommendations on what lessons can be learned in terms of enhancing further policies and procedures for protecting the safety of children.

A full Report would be expected before the Minister of Education before 24 March 2010.

2.2 Terms of Reference

2.2.1 The Minister issued Terms of Reference for the investigation which centred around seven key areas, including:

- Actions of C2K
- C2K Protocols, Procedures and Processes in Respect of Child Protection
- C2K Reporting Procedures to DE in Respect of Child Protection
- Potentially Harmful Content or Interactive Elements of Sparklebox
- Use by Schools in the North of Ireland
- Informing Service Providers and Users
- Recommendations

2.3 Methodology

2.3.1 The WELB Chief Executive set up an Investigation Team comprised of officers from Corporate Services and Internal Audit to conduct the investigation. The Team interviewed and consulted with officers from C2K to establish the facts of the case and address the areas identified within the Terms of Reference as identified by the Minister of Education. The Team reported regular progress to a member of WELB Senior Management.

2.3.2 An external quality assurance was conducted on the investigation process by the Head of Internal Audit from the North Eastern Education and Library Board.

2.3.3 For the purpose of clarity, the seven key areas identified in the Minister's Terms of Reference form the framework of this Report. The investigation of each key area is discussed under the following headings:

- Key Findings/Facts
- Comments/Conclusions
- Recommendations.

Section 3 - ACTIONS OF C2K

3.1 Introduction

3.1.1 This Section addresses Key Area 1 of the Terms of Reference:

To establish and explain the actions of C2K from the time it became aware of the trial of the owner of Sparklebox to the point at which it removed access to Sparklebox from the system.

3.2 Key Findings/Facts

3.2.1 The timeline below details the sequence of events, as described by C2K officers, from when C2K was first made aware of the Sparklebox issue until the decision was made by C2K to block the site.

Thursday 17 December 2009: The C2K Director of Integration and Development (I&D) was informed by a manager within the South Western Grid for Learning (SWGfL) of an emerging issue with the ownership of the Sparklebox website. SWGfL is a Regional Broadband Consortia (RBC) providing internet connectivity to schools in the south west of England. SWGfL had blocked the site some time ago when they were first alerted to a possible problem relating to Safeguarding, on which they were unable to reveal information because of current UK disclosure laws. On receipt of this information, the C2K Director of I&D sought further clarification from SWGfL and conducted an immediate investigation of the Sparklebox website and confirmed that no inappropriate material or functionality, which would be potentially harmful to children, was accessible through the C2K network. Whilst the Sparklebox website included a facility for uploading photographs, an email facility and a live blog, C2K's web filtering system ensured that none of this interactivity was accessible by schools at any time via the C2K network. All interactive elements of the website were linked through a toolbar which was blocked by default on the C2K network.

Monday 21 December 2009 (within two working days of being notified): The Sparklebox issue was brought to the attention of the C2K Management Board and, following discussion it was affirmed that the site, as accessed through the C2K network, posed no risk to children. It was agreed that usage of the site across Northern Ireland's schools should be investigated, that advice should be sought from the British Education Communication and Technology Agency (BECTA), and the position being taken by other RBCs should be researched. BECTA is the statutory body charged with ensuring that technology is used effectively and efficiently throughout the British education system.

Tuesday 5 January 2010 (approximately three working days later, given Christmas closures): BECTA advice provided background to the Sparklebox issue, raising specific concerns over some aspects of Sparklebox; including a facility for photographs to be sent in and published online and a live blog (**Appendix II: Becta Advice 5/01/10**). BECTA also included a statement from the Child Exploitation and Online Protection centre (CEOP). CEOP's statement supported the blocking of Sparklebox by RBCs... *'until they are satisfied that suitable safeguarding arrangements are in place'*. CEOP recommended that *'any schools who chose to overrule their central filtering lists (should) give due consideration to a website specific school risk analysis and risk management plan'*. C2K again considered its safeguarding arrangements in regard to Sparklebox and affirmed that no inappropriate material or functionality existed on the website, as accessed through the C2K network, which would be potentially harmful to children. Furthermore, unlike some other RBCs, Northern Ireland schools could not overrule the C2K filtering system.

Monday 11 January 2010 (four working days later): The C2K Management Board reviewed usage statistics on Sparklebox which showed significant levels of use by schools in Northern Ireland (during the week 14 to 18 Dec 2009, 1433 users from across 753 (over 60%) schools in Northern Ireland accessed the site via the C2K network). On the basis of the usage figures and BECTA/CEOP advice, the C2K Management Board conducted a full risk assessment of the Sparklebox website, as deployed through C2K, and concluded that it provided a range of educational content of value to schools and had no interactive elements that would put children using the site at risk. (**Appendix III: Sparklebox Risk Assessment Criteria used by C2K and C2K's Internet Filtering Processes**). C2K's web filtering system ensured that none of the interactive elements of the Sparklebox website (including a facility for uploading photographs, an email facility and a live blog) were accessible by schools at any time via the C2K network. All interactive elements of the website were linked through a toolbar which was blocked by default on the C2K network. However, bearing in mind the sensitivity of the issue, it was agreed to continue to monitor the situation by reviewing advice and guidance available from BECTA, CEOP and the National Education Network (NEN) which comprises all UK RBCs.

Monday 18 January 2010 (five working days later): A second CEOP statement was issued by the Head of Education, CEOP advising that the owner of Sparklebox had now been sentenced to 12 months in prison, and recommending a possible resumption of use of the Sparklebox website in line with normal risk assessment and management policies.

Monday 25 January 2010 (five working days later): The C2K I&D Director reported to the C2K Management Board on the RBC position as presented at the NEN eSafety Group meeting held on 12 January 2010. At this time C2K confirmed that 6 RBCs (50%) were known to have blocked the site. The second CEOP statement, which recommended a possible resumption of use of the site,

was reviewed by C2K and the decision was taken to endorse the position agreed on 11 January 2010.

Thursday 28 January 2010 (three working days later): The C2K Belfast Support Manager received advice from the Belfast Education & Library Board's Child Protection Service that a Belfast Primary School had stopped using the site as a result of a parental complaint. A parent had noted that her daughter was in possession of a Sparklebox worksheet and was concerned that, by using the site, the school was potentially supporting and providing income to a convicted paedophile.

Monday 1 February 2010 (within two working days): The C2K Management Board again reviewed the position and decided to block the site on moral grounds, based on new thinking beyond existing risk assessment criteria. Although the Sparklebox website, as accessed via the C2K network and in line with Internet Watch Foundation (IWF) standards, was inherently safe and carried no child protection risk in terms of material and functionality, it had caused upset to a parent. C2K recognised that schools, parents and children may not wish to be perceived as endorsing use of a site whose owner was found guilty of possessing indecent images of children. C2K's decision to block the site at this stage was based on the unique situation presented by the Sparklebox case, including: C2K did not wish to be perceived as endorsing the Sparklebox website; C2K did not wish to be perceived as supporting the former operator of Sparklebox in generating an income, and similar resources are available to schools on other sites.

Blocking of the site took effect from 1 February 2010. Schools were immediately informed of the blocking decision through an information alert placed on the C2K exchange (extranet for schools). It was agreed to continue to monitor the curricular impact this might have should a significant number of schools raise objections.

3.3 Comments/Conclusions

- 3.3.1** From the evidence available, Thursday 17 December 2009 was the first communication C2K received on the Sparklebox issue.
- 3.3.2** From the information obtained, it appears that West Mercia Police and SWGfL felt unable to share this information earlier due to '*UK disclosure laws*'. SWGfL does not have a statutory responsibility to alert other RBCs of such issues. There is a concern that legislation greatly prevented the police from sharing relevant information therefore impacting on reaction time.
- 3.3.3** There is uncertainty around current arrangements for the reporting of and flow of information from/to RBCs including: channels of communication; statutory responsibilities, and advice on actions which should be taken.

- 3.3.4** CEOP's advice of 5 January supported blocking of the site until suitable safeguarding arrangements were in place and advised that a risk analysis be conducted in cases where site usage were to be continued. C2K were confident at this time that such safeguarding arrangements were in place as the web filtering system blocked access to all interactive elements of the site.
- 3.3.5** C2K conducted a risk assessment and concluded that it was confident that its web filtering systems continued to block any potential harmful content in Sparklebox, and that no interactive elements of Sparklebox were accessible at any time within schools via the C2K network. Given this and the significant levels of usage by schools, C2K took a decision not to block the Sparklebox site. C2K always considered the safeguarding of children as critical and would have blocked the site immediately if there was any evidence that children would be in danger by using the C2K network.
- 3.3.6** C2K continuously monitored the Sparklebox situation and sought and shared updated information, from BECTA, CEOP and the National Education Network, with members of the C2K Management Board.
- 3.3.7** Advice from CEOP, issued on 18 January 2010, advised that the owner of Sparklebox had now been sentenced to 12 months in prison and that schools could look to resume use of the Sparklebox website in line with their normal risk assessment and management policies.
- 3.3.8** Once aware of the parental complaint, although the latest advice from CEOP continued to recommend a managed resumption of use of the Sparklebox site, C2K took the decision to block the site on moral grounds. C2K did not wish to be perceived as endorsing the Sparklebox website; C2K did not wish to be perceived as supporting the former operator of Sparklebox in generating an income, and similar resources are available to schools on other sites.
- 3.3.9** C2K completed an internet search to identify any other Northern Ireland educational bodies that endorsed or had a link to the Sparklebox website, and subsequently informed CCEA (Council for the Curriculum, Examinations and Assessment) of the issue.
- 3.3.10** Despite the fact that the Sparklebox site was blocked on the C2K network, C2K had no powers to prevent teachers from accessing the site from home or elsewhere and bringing materials into school.
- 3.3.11** Clear guidance is not available from any source in relation to criteria for cessation of website usage in relation to criminal convictions of those affiliated to websites.

3.4 Recommendations

- 3.4.1 DE should request that the relevant national bodies conduct a review of current arrangements for the reporting of and flow of information from/to RBCs including: channels of communication; statutory responsibilities, and advice on actions which should be taken. Implementation of formal reporting arrangements should be considered e.g. one appointed body acting as interagency contact point for dissemination of such information **(Ref: 3.3.1 / 3.3.2 / 3.3.3)**.
- 3.4.2 DE should consider developing and issuing clear guidance and protocols regarding the use of materials and resources in the classroom from websites blocked by C2K as such websites can be accessible from non C2K machines and from home **(Ref 3.3.10)**.
- 3.4.3 DE should consider issuing clear guidance recommending the removal of all Sparklebox related materials and resources from schools and from all non C2K computers located in schools **(Ref 3.3.10)**.
- 3.4.4 DE should request that the relevant national bodies consider developing and issuing clear guidance and protocols regarding the use of websites found to be designed, owned or operated by individuals found guilty of offences against children **(Ref 3.3.11)**.

Section 4 - C2K PROTOCOLS, PROCEDURES & PROCESSES IN RESPECT OF CHILD PROTECTION

4.1 Introduction

4.1.1 This Section addresses Key Area 2 of the Terms of Reference:

'To report on the protocols, procedures and processes used by C2K in respect of child protection issues relating to schools' use of the C2K system and to assess whether they were appropriate and effective. In particular to give an assessment of whether C2K's responses were proportionate and timely'.

4.2 Key Findings/Facts

4.2.1 C2K has a range of existing protocols and procedures around child protection in relation to the use of ICT systems in schools.

4.2.2 The C2K internet filtering system ensured that none of the interactive elements of the Sparklebox website (including a facility for uploading photographs, an email facility and a live blog) were accessible by schools at any time via the C2K network. Interactive elements of the website were linked through a toolbar which was blocked by default on the C2K network. C2K refers to advice from BECTA with regard to filtering of websites in schools in terms of the categories of websites which should not, by default, be available to schools.

4.2.3 C2K has in place an internet filtering and control system called Websense, administered on behalf of C2K by Hewlett Packard. Websense is reported to **continuously** monitor the content (words/images/interactivity etc.) of sites and allows for inappropriate content/sites to be blocked/restricted in accordance with a predetermined categorising traffic light system. Schools' internet traffic is proactively monitored on an ongoing basis by the security team in Hewlett Packard, who alert C2K to any abnormal activity. At January 2010, Websense had assessed approximately 216 million websites with approximately 36 million blocked websites in its Master Database. The Sparklebox website, as accessed via the C2K network, was rated as category 'green' by Websense, meaning 'accessible to all users in school'.

4.2.4 In the year February 2009 to February 2010, the C2K Helpdesk received 731 requests from schools to unblock sites which had been automatically blocked by Websense (an average of 70 per month) and 661 requests from schools to block sites which had been allowed by Websense (an average of 55 per month), (e.g. a school might request that a site deemed 'inappropriate content' be unblocked for use in 'A level biology, whilst there may be a request to block an unblocked

games site). A specific contractual service level agreement requires the blocking of websites within 30 minutes of request. If there is a question of the suitability of material from an educational perspective, an assessment is carried out by a senior C2K member of staff with a teaching background who will consider the site in relation to C2K's web filtering policy and consult with other professional bodies if necessary in making a decision. The school that made the request is informed of the outcome.

4.2.5 From the evidence provided, C2K's web filtering system complies with the Internet Watch Foundation (IWF), an organisation based in the UK whose mission is to minimise the availability of illegal online content. Websense has access to the IWF's list of sites classified as containing "potentially illegal content".

4.2.6 As no internet filtering system is infallible, C2K proactively issues advice and training to schools emphasising the following points:

- Any filtering service, no matter how thorough, can never be comprehensive, and it is essential that schools have a clearly understood policy on acceptable use for all users, and that adequate supervision is maintained.
- Despite the filtering process in place, it is possible for unsuitable websites to become available, sometimes for short periods after they are launched, and schools should ensure that the Acceptable Use policy includes a defined course of action if a student or member of staff finds an inappropriate site (e.g. to notify a specified person(s) immediately, giving details of the site and the time and date of access).
- All staff and students are advised that their use of the internet and email is monitored by C2K and that any use deemed to be inappropriate will be reported to the Principal.
- It is the joint responsibility of school staff and the parent or guardian of each pupil to educate the pupil about his or her responsibility when using the Internet.
- Schools must help C2K maintain an effective and satisfactory filtering mechanism by reporting any sites which they wish to be assessed for blocking or unblocking.

4.2.7 C2K has representation within The National Education Network (NEN) and continually reviews policies and processes within guidelines and information emanating from the community. Of particular relevance is the representation on the NEN E-Safeguarding Group.

4.2.8 C2K staff have subscribed to the Safetynet mailing list to discuss and share information to support the development of e-safety good practice within educational organisations.

4.2.9 C2K monitors CEOP advice which has come through postings in a range of forums.

4.2.10 C2K has taken a number of measures to ensure Child Protection is integral to all aspects of service delivery, including:

- C2K has incorporated DE Child Protection Guidance within its Child Protection and internet safety policies and procedures;
- DE 'Acceptable use of the Internet and Digital Technologies in Schools' Policy is integrated into C2K Child Protection policies and procedures;
- all C2K support staff members have received Child Protection training;
- C2K support staff provide advice to schools on various Child Protection issues such as cyberbullying, and
- child safety features in C2K training for school Principals & senior school staff, including reference to DE Circular 2007/1 (**Appendix IV: C2K Child Protection Procedures**).

4.2.11 C2K supports a pilot project with the PSNI to help educate the community to the benefits and required precautions in relation to the internet.

4.2.12 C2K was awarded accreditation for internet safety under the BECTA process in 2008. However, the BECTA process has since changed and staff members are currently working with BECTA to renew accreditation under the new process (April 2010).

4.3 Comments/Conclusions

4.3.1 Assessment of C2K's actions, as detailed in Section 3, would indicate that C2K's response to the Sparklebox issue fully complied with their existing protocols, procedures and processes, in line with IWF standards. However, a number of weaknesses in the overall communications process resulted in a delay in communication of the Sparklebox issue to C2K and other RBCs. Also, C2K did not have specific guidance in place for dealing with the new moral territory presented by the Sparklebox issue.

4.3.2 C2K Child Protection protocols, procedures and processes meant that none of the interactive elements of Sparklebox were accessible to schools via the C2K network. Any attempt to access the interactive toolbar on the Sparklebox site would have been blocked by the automated filtering system.

4.3.3 C2K has invested considerable resources in its internet filtering and monitoring system.

4.3.4 As no web filtering system is infallible, C2K provides training and guidance to schools in relation to local precautions and the responsibilities of schools, teachers, parents and pupils in respect of e-safety and Child Protection.

4.3.5 C2K's internal meeting structure allowed it to alert and involve relevant senior staff, and begin to address the Sparklebox issue in a reasonable period of time, from the moment C2K was made aware of the issue.

- 4.3.6 The Sparklebox issue resulted in C2K finding itself in new moral territory, regarding the suitability of the owner/operator of a website, with no explicit guidance on how to proceed.
- 4.3.7 C2K actively supports the development of e-safety good practice within educational organisations; has subscribed to a number of forums that promote e-safety good practice, and actively pursues BECTA accreditation.
- 4.3.8 C2K has invested considerable time and resources in ensuring that Child Protection is integral to all aspects of service delivery.
- 4.3.9 The C2K Management Board, based on assessment in line with IWF standards, determined that the Sparklebox website, as accessible on the C2K network, had no interactive elements that would put children using the site at risk. Consequently, C2K did not seek advice from local sources such as the DE, Joint Legal Service and WELB Child Protection Service regarding the Sparklebox issue.

4.4 Recommendations

- 4.4.1 C2K should review its standard operating procedures and risk assessment criteria to deal with unique issues such as Sparklebox, which lie outside C2K's normal escalation processes and are of a moral nature. This should provide clear instruction on how C2K should consult, manage and communicate, including a requirement that the C2K Management Board should seek immediate advice from local sources such as the Joint Legal Service, WELB Child Protection Service and DE (**Ref: 4.3.1 / 4.3.6 / 4.3.9**).
- 4.4.2 C2K should continue to work with the WELB Child Protection Service to review the suitability of provision of training and guidance to schools in relation to local precautions and the responsibilities of schools, teachers, parents and pupils in respect of e-safety and Child Protection (**Ref: 4.3.4**).
- 4.4.3 C2K should continuously monitor and take account of new guidance from DE and other sources in relation to e-safety and Child Protection (**Ref: 4.3.6 / 4.3.9**).
- 4.4.4 In future, in dealing with unique issues such as Sparklebox, C2K should consider immediately blocking the website pending further discussion with DE, Joint Legal Service and WELB Child Protection Service (**Ref: 4.3.6 / 4.3.9**).

Section 5 - C2K REPORTING PROCEDURES TO DE IN RESPECT OF CHILD PROTECTION

5.1 Introduction

5.1.1 This Section addresses Key Area 3 of the Terms of Reference:

'To report on C2K's reporting procedures to the Department around child protection issues'.

5.2 Key Findings/Facts

5.2.1 Normal Board procedures for reporting specific Child Protection issues are via the Board's Child Protection Support Service for Schools (CPSSS) and, if appropriate, the Police and Social Services (Gateway teams in Health & Social Care Trusts). There are no formal reporting procedures between the Boards and DE in relation to specific Child Protection issues. These arrangements are in accordance with the provisions of DE Circular 1999/10 Pastoral Care in Schools: Child Protection. The, DE led, DOCPEG Group (Designated Officers for Child Protection Education Group) which meets on a monthly basis provides strategic direction in relation to child protection policy, practice and training within education at a regional level.

5.3 Comments/Conclusions

5.3.1 Normal Board procedures for reporting specific Child Protection issues are via the Board's Child Protection Support Service for Schools (CPSSS) and, if appropriate, the Police and Social Services. There are no formal reporting procedures between the Boards and DE in relation to specific Child Protection issues.

5.3.2 C2K does not have a designated Child Protection Officer. However C2K is an integral part of the WELB and would refer to the Board's Child Protection Officers as appropriate.

5.3.3 To report every site that is blocked or filtered to DE would be impracticable as there could be up to 3 or 4 sites blocked every day.

5.4 Recommendations

5.4.1 The Inter Departmental Group on Safeguarding should consider developing a communication strategy detailing a sensible and practicable reporting mechanism for 'child protection' issues to DE. Clarification is required from DE as to when and how such issues should be reported (**Ref: 5.3.1**).

- 5.4.2** C2K should identify a designated officer with responsibility for e-safety Child Protection issues. **(Ref: 5.3.2).**
- 5.4.3** The Inter Departmental Group on Safeguarding should develop criteria for identifying and categorising e-safety 'child protection' issues **(Ref: 5.3.3).**
- 5.4.4** C2K should maintain a register of blocked websites which should be reported, for review, quarterly to the C2K Management Board and annually to the C2K Project Board **(Ref: 5.3.3).**

Section 6 - POTENTIALLY HARMFUL CONTENT OR INTERACTIVE ELEMENTS OF SPARKLEBOX

6.1 Introduction

6.1.1 This Section addresses Key Area 4 of the Terms of Reference:

'To determine if the Sparklebox website contained any content or interactive elements that would have been harmful to children? If so, to explain what action was taken regarding these elements'.

6.2 Key Findings/Facts

6.2.1 Whilst the Sparklebox website included a facility for uploading photographs, an email facility and a live blog, C2K's web filtering system ensured that none of this interactivity was accessible by schools at any time via the C2K network. All interactive elements of the website were linked through a toolbar which was blocked by default on the C2K network.

6.2.2 On being made aware of the emerging Sparklebox issue, the C2K Management Board conducted immediate investigations and a risk assessment of the Sparklebox website, as accessed through C2K, and concluded that it provided a range of educational content of value to schools, and had no interactive elements that would put children using the site at risk.

6.2.3 C2K continued to monitor the Sparklebox situation by reviewing advice and guidance available from BECTA, CEOP and NEN.

6.2.4 On becoming aware of the parental complaint on Thursday 28 January 2010, C2K took immediate steps to block the Sparklebox site on its network, on moral grounds, with effect from Monday 1 February 2010.

6.3 Comments/Conclusions

6.3.1 None of the interactive elements of the Sparklebox website were accessible to schools via the C2K network and therefore posed no risk to children.

6.3.2 C2K conducted a risk assessment of the Sparklebox site and continuously monitored advice regarding use of the site.

6.3.3 Although the accessible elements of the Sparklebox website were considered safe and of no risk to children, C2K ultimately blocked the site because it did not wish to be perceived as endorsing the Sparklebox website; did not wish to be perceived

as supporting the former operator of Sparklebox in generating an income, and similar resources are available to schools on other sites.

6.4 Recommendations

- 6.4.1** Non-applicable (C2K's internet filtering system ensured that no interactive elements of the Sparklebox website were accessible via the C2K network and therefore not harmful to children).

Section 7 - USE BY SCHOOLS IN THE NORTH OF IRELAND

7.1 Introduction

7.1.1 This Section addresses Key Area 5 of the Terms of Reference:

'To determine how many schools in the north of Ireland used the Sparklebox website'.

7.2 Key Findings/Facts

7.2.1 A snapshot of usage shows that from 4 January 2010 up to the date on which the Sparklebox site was blocked, 1 February 2010 (a period of approximately one month), **4086** users from across **953** schools in Northern Ireland accessed the site via the C2K network.

7.3 Comments/Conclusions

7.3.1 The statistics on usage of the Sparklebox site by schools, via the C2K network, reveal significant levels of usage; 953 schools represents approximately 80% of Northern Ireland schools.

7.3.2 These figures do not include access to the Sparklebox site by teachers via routes other than the C2K network, such as from home.

7.4 Recommendations

7.4.1 DE should consider issuing clear guidance recommending the removal of all Sparklebox related materials and resources from schools and from all non C2K computers located in schools (**Ref 3.3.10**).

Section 8 - INFORMING SERVICE PROVIDERS AND USERS

8.1 Introduction

8.1.1 This Section addresses Key Area 6 of the Terms of Reference:

'To determine how this matter can be brought to the attention of service providers and users'.

8.2 Key Findings/Facts

8.2.1 C2K have established numerous links with service providers and users which will provide them with the opportunity to share the Sparklebox experience and lessons learned.

8.3 Comments/Conclusions

8.3.1 This Report and recommendations offer useful information on, and lessons learned from, the Sparklebox experience.

8.4 Recommendations

8.4.1 DE should consider making this Report and recommendations available to other relevant bodies (e.g. RBCs, Local Authorities, BECTA and CEOP) in order to share lessons learned from the Sparklebox experience **(Ref 8.3.1)**.

8.4.2 Elements of this Report and recommendations, as well as guidance from the Inter Departmental Safeguarding Group, should inform future e-safety training and guidance to schools, teachers, parents and pupils in order to share lessons learned from the Sparklebox experience **(Ref 8.3.1)**.

Section 9 - RECOMMENDATIONS

9.1 Introduction

9.1.1 This Section addresses Key Area 7 of the Terms of Reference:

'To make recommendations on what lessons can be learned from this case in terms of enhancing further policies and procedures for protecting the safety of children. The recommendations should identify cross-cutting issues which affect other departments in the north of Ireland, as well as any north/south and British/Irish issues'.

9.1.2 The Sparklebox website, as accessed via the C2K network, was inherently safe and carried no child protection risk in terms of material and functionality. C2K always considered the safeguarding of children as critical and would have blocked the site immediately if there was any evidence that children would be in danger by using the C2K network. The following recommendations are being made to further enhance the safety of children accessing or downloading information from the internet.

9.1.3 There are a total of 14 recommendations emanating from the investigation. Recommendations are categorised under the following headings: Recommendations for C2K, Recommendations for DE and Cross-cutting Recommendations.

9.2 Recommendations for C2K

9.2.1 C2K should review its standard operating procedures and risk assessment criteria to deal with unique issues such as Sparklebox, which lie outside C2K's normal escalation processes and are of a moral nature. This should provide clear instruction on how C2K should consult, manage and communicate, including a requirement that the C2K Management Board should seek immediate advice from local sources such as the Joint Legal Service, WELB Child Protection Service and DE (**Ref: 4.3.1 / 4.3.6 / 4.3.9**).

9.2.2 C2K should continue to work with the WELB Child Protection Service to review the suitability of provision of training and guidance to schools in relation to local precautions and the responsibilities of schools, teachers, parents and pupils in respect of e-safety and Child Protection (**Ref: 4.3.4**).

9.2.3 C2K should continuously monitor and take account of new guidance from DE and other sources in relation to e-safety and Child Protection (**Ref: 4.3.6 / 4.3.9**).

- 9.2.4 In future, in dealing with unique issues such as Sparklebox, C2K should consider immediately blocking the website pending further discussion with DE, Joint Legal Service and WELB Child Protection Service **(Ref: 4.3.6 / 4.3.9)**.
- 9.2.5 C2K should identify a designated officer with responsibility for e-safety Child Protection issues **(Ref: 5.3.2)**.
- 9.2.6 C2K should maintain a register of blocked websites which should be reported, for review, quarterly to the C2K Management Board and annually to the C2K Project Board **(Ref: 5.3.3)**.

9.3 Recommendations for DE

- 9.3.1 DE should request that the relevant national bodies conduct a review of current arrangements for the reporting of and flow of information from/to RBCs including: channels of communication; statutory responsibilities, and advice on actions which should be taken. Implementation of formal reporting arrangements should be considered e.g. one appointed body acting as interagency contact point for dissemination of such information **(Ref: 3.3.1 / 3.3.2 / 3.3.3)**.
- 9.3.2 DE should consider developing and issuing clear guidance and protocols regarding the use of materials and resources in the classroom from websites blocked by C2K as such websites can be accessible from non C2K machines and from home **(Ref 3.3.10)**.
- 9.3.3 DE should consider issuing clear guidance recommending the removal of all Sparklebox related materials and resources from schools and from all non C2K computers located in schools **(Ref 3.3.10)**.
- 9.3.4 DE should request that the relevant national bodies consider developing and issuing clear guidance and protocols regarding the use of websites found to be designed, owned or operated by individuals found guilty of offences against children **(Ref 3.3.11)**.
- 9.3.5 DE should consider making this Report and recommendations available to other relevant bodies (e.g. RBCs, Local Authorities, BECTA and CEOP) in order to share lessons learned from the Sparklebox experience **(Ref 8.3.1)**.

9.4 Cross-cutting Recommendations

- 9.4.1 The Inter Departmental Group on Safeguarding should consider developing a communication strategy detailing a sensible and practicable reporting mechanism for 'child protection' issues to DE. Clarification is required from DE as to when and how such issues should be reported **(Ref: 5.3.1)**.

- 9.4.2** The Inter Departmental Group on Safeguarding should develop criteria for identifying and categorising e-safety 'child protection' issues **(Ref: 5.3.3)**.
- 9.4.3** Elements of this Report and recommendations, as well as guidance from the Inter Departmental Safeguarding Group, should inform future e-safety training and guidance to schools, teachers, parents and pupils in order to share lessons learned from the Sparklebox experience **(Ref 8.3.1)**.

Section 10 - APPENDICES

10.1 Appendix I: DE Letter and Report Terms of Reference

DEPUTY SECRETARY
Schools & Youth Policy
Robson Davison

Tel: 02891 279383
Fax: 02891 279266
E-mail robson.davison@deni.gov.uk

10 February 2010

Mr. Barry Mulholland
Chief Executive
Western Education & Library Board
Campsie House
1 Hospital Road
OMAGH
BT79 0AW

Dear Barry

I am writing on behalf of the Department to instruct you to investigate comprehensively the issues around the Sparklebox case. It has raised concerns about procedures and processes around child protection and, in particular, why C2k did not pass on information about this case to the Department immediately and why a decision to restrict access to the site was taken some time after the matter was raised. The Department would wish you to establish the full facts of the case, and to make recommendations on what lessons can be learned from this in terms of enhancing further policies and procedures for protecting the safety of children.

The Minister of Education made a Ministerial Statement in the Assembly on Monday. She has advised Members that you will be instructed to investigate this matter and she will undertake to revert to the Assembly at the earliest opportunity. The Minister expects a full report before 24th March. I attach the proposed Terms of Reference.

I shall act as your liaison person within the Department regarding this matter. I would welcome an opportunity to meet at your earliest convenience to review arrangements and a time frame for expediting this assignment.

Yours sincerely,



R DAVISON

TERMS OF REFERENCE – 9th February 2010

1. To establish and explain the actions of C2k from the time it became aware of the trial of the owner of Sparklebox to the point at which it removed access to Sparklebox from the system.
2. To report on the protocols, procedures and processes used by C2k in respect of child protection issues relating to schools' use of the C2k system and to assess whether they were appropriate and effective. In particular to give an assessment of whether C2k's responses were proportionate and timely.
3. To report on C2k's reporting procedures to the Department around child protection issues.
4. To determine if the Sparklebox website contained any content or interactive elements that would have been harmful to children? If so, to explain what action was taken regarding these elements?
5. To determine how many schools in the north of Ireland used the Sparklebox website.
6. To determine how this matter can be brought to the attention of service providers and users.
7. To make recommendations on what lessons can be learned from this case in terms of enhancing further policies and procedures for protecting the safety of children. The recommendations should identify cross-cutting issues which affect other departments in the north of Ireland, as well as any north/south and British/Irish issues.

10.2 Appendix II: BECTA Advice received on 5 January 2010

Statement from CEOP

Classification: NOT PROTECTIVELY MARKED//

Following queries into the website sparklebox.co.uk over the past couple of months, CEOP have investigated the website and its management. It should be noted that Sparklebox's primary aim is to provide resources for schools (in particular teachers) but that there are opportunities for pictures of young people to be sent in and be published online and that until recently there was a live blog. Sparklebox state that all staff have been through relevant checks however CEOP can support the recent SWGfL statement released this week, an extract of which is below:

"It is understood that a person who is on the record as an owner and director of Sparklebox Teacher Resources Limited (which appears to claim ownership of the SparkleBox web site and children's learning materials) is a registered sex offender who has recently admitted a second offence, is on remand in prison and is awaiting sentence in January."

CEOP are also aware that a number of RBC's and Local Authorities have blocked sparklebox.co.uk until they are satisfied that suitable safeguarding arrangements are in place. CEOP supports this stance and would recommend that any schools who choose to overrule their central filtering lists give due consideration to a website specific school risk analysis and risk management plan.

10.3 Appendix III: Sparklebox Risk Assessment Criteria used by C2k and C2k's Internet Filtering Processes

Jimmy Stewart

From: Jayne McIlgorm
Sent: 28 January 2010 17.15
To: Sharon.LawlDr@deni.gov.uk
Ce: Bnjce.Fitzsimons@deni.gov.uk; Helen.McConkey@deni.gov.uk;
MaryPQtter@dem.gav.uk; Jimmy STewart, Roy Beallie; Tim Malchett
Subject: Query on sparklebox

Sharon

As discussed earlier on the phone. www.sparklebox.CQ.uk is available to all schools on the c2k network.

When reviewing whether access should be permitted or denied to this site, C2k considered the following:

- This site is categorized as Educational Materials by Web sense, the central software which provides the c2k filtering solution for schools. Sites which are listed under Educational Materials are available to all schools. There is one component of the web site where users can select to download a sparklebox toolbar, this has been and continues to be blocked under the category Potentially Unwanted Software.
- The social networking element of the Site has been removed
- The site does not appear to contravene the criteria for Becta accreditation which is based on the categories laid out in BSI PAS743G08 specification
- Reports show that the site is heavily used by Primary schools which suggests that teachers consider it to be a valuable resource.
- The position which is reported on the safety net blog hosted on Becta <http://lists.becta.org.uk/Pipermail/safenet/2010-January/01130.html> states that 'CEOP feels that schools could look to resume their use of the website in line with their normal risk assessment and management policies and in consultation with their local authority.

C2k will continue to monitor and review access to the site in accordance with advice from Becta, CEOP and other location agencies.

As suggested, it would be helpful to schedule a meeting with yourself and colleagues to discuss and review C2k procedures for internet filtering.

If you would like to forward some dates, I can check C2k diaries.

Please let me know if you require any further information.

Regards Jayne

Jayne McIlgorm
Technical Cc-ifilial1
C2k
GDI 02890279009
oro.uk

C2k's Internet filtering processes

C2k refers to advice from Becta with regard to filtering of websites in schools. Filtering policies have been designed in accordance with recommendations from Becta in terms of categories of websites which should not, by default, be available to schools.

- **Adult:** content containing sexually explicit images, video or text, the depiction of actual or realistic sexual activity
- **Violence:** content containing graphically violent images, video or text
- **Race hate material:** content which promotes violence or attack on individuals or institutions on the basis of religious, racial or gender grounds
- **Illegal drug taking and the promotion of illegal drug use:** content relating to the use or promotion of illegal drugs or misuse of prescription drugs
- **Criminal skill/activity:** content relating to the promotion of criminal and other activities
- **Gambling:** content relating to the use of online gambling websites or information relating to the promotion of gambling and gambling advice.

The C2k filtering system deployed to schools in Northern Ireland is underpinned by products from Websense, one of the leaders in providing web security (refer Gartner). The Websense filtering database supports a filtering database containing over 30 million urls in more than 90m categories, plus over 1000 protocols in 15 categories. Websense Security Labs mines and analyses over 600 million sites every week, searching for malicious content and blended threats.

As a member of the Internet Watch Foundation (IWF – an organisation based in the UK whose mission is to minimise the availability of illegal online content www.iwf.org.uk), Websense has access to the IWF's list of sites classified as containing "potentially illegal content".

C2k uses the categories to define three types of access type:

- GREEN Accessible to all users in school
- AMBER Accessible to school selected groups of users (can be changed by the C2k School Manager)
- RED Not accessible to any users

The key processes are:

- Download each night of new website categories from Websense to the Data Centre;
- In the event of a site not being known to Websense (eg. a newly created website by a student), text in the URL is scanned from an extensive list of banned words. If these are discovered, access to the site is blocked, otherwise, access is granted.
- Each night, an automated process trawls through sites that have been accessed but which Websense has not yet categorised. Using artificial intelligence, the software

attempts to assign a category to the website. The next stage is intervention by trained professional researchers to check the categorisation, particularly of inappropriate websites. If this category is a red category, or an amber category for which the user is not a member, this site will not be accessible the following day for the user.

- For the remaining uncategorised sites, the security team monitors those which are getting a large number of hits per day but for which no category has been assigned, and assigns a category to these.
- There are routine daily checks of browsing activity by the security team who look for 'key' words which may indicate inappropriate browsing, for example inappropriate text strings that users have searched for in search engines

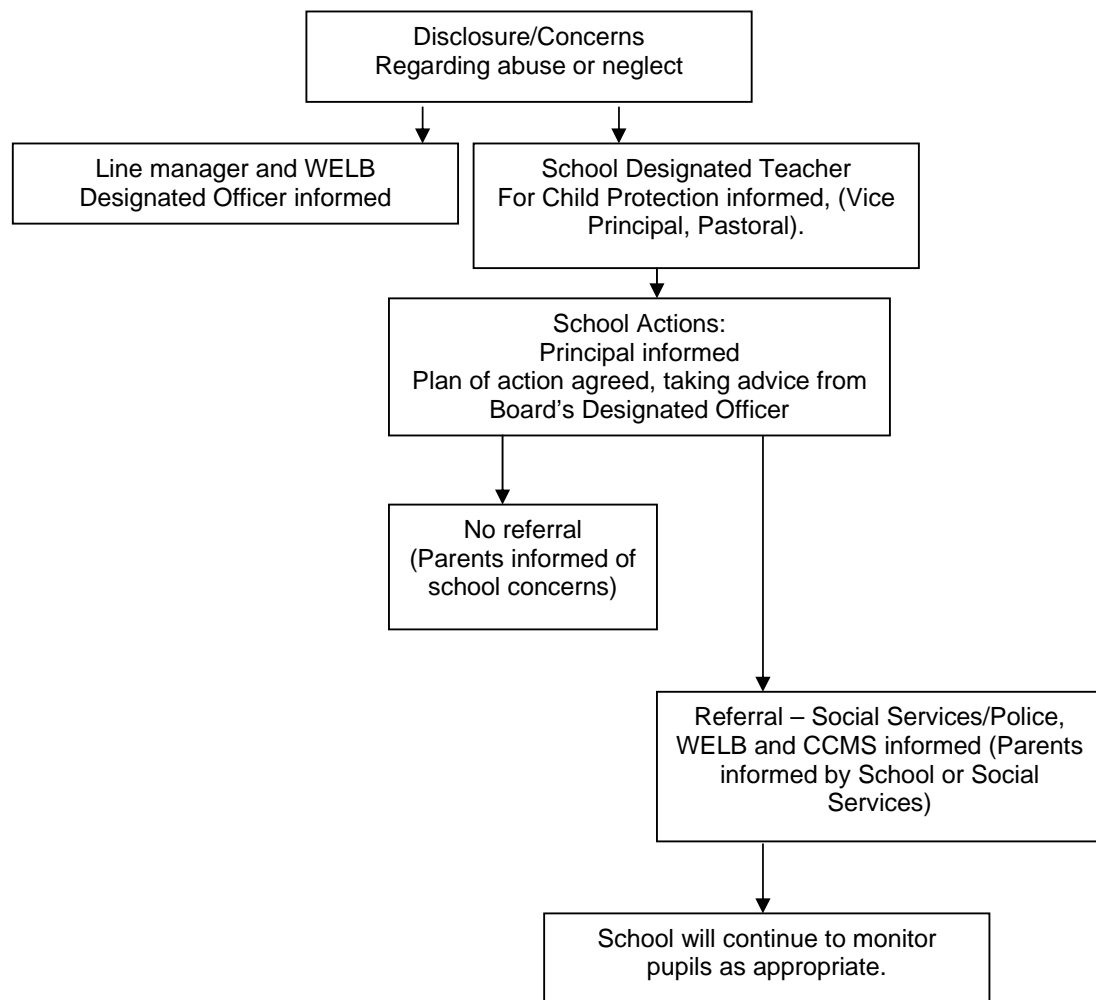
10.4 Appendix IV: C2k CHILD PROTECTION procedures

The following principles form the basis of our child protection activity:

- children should be listened to and taken seriously
- in any incident the child's welfare must always be the paramount consideration.

In the event of any concern of suspected abuse arising during a support visit staff **must** inform the school's Designated Teacher for Child Protection and, on return to base, their line manager and the WELB Designated Officer.

Standard protocol for dealing with Child Protection Incidents



It should be noted that information given to members of staff about possible child abuse cannot be held 'in confidence'. In the interests of the child, staff may need to share this information with other professionals. However, only those who need to know will be told.