



JFS School

The Mall, Kenton, Harrow, Middlesex, HA3 9TE.

JFS SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURES

Reviewed in the Summer Term 2018 & Ratified by FGB 21.01.19

Next due for review in the Summer Term 2019

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1. POLICY STATEMENT AND PRINCIPLES

Values and Ethos

Judaism values the need to look after the needs of others. It also values the need to look after one's own physical and spiritual needs properly. These Torah obligations:

Vayikra 19:18

וְאָהַבְתָּ לְרֵעֲךָ כְּמוֹךָ: Love your neighbour as yourself

Devarim 4:9

הִשְׁמַר לְךָ וְשִׁמְרָה נְפִשְׁךָ מְאֹד Take very good care of your physical and spiritual self,

Devarim 4:15

וְנִשְׁמַרְתֶּם מְאֹד, לְנַפְשֵׁיכֶם You should look after yourself properly

Together these provide an essential part of the foundation of the way JFS approaches safeguarding.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children including those identifying as LGBT+. We endeavour to provide a safe and welcoming environment where students are respected and valued. We will act quickly and follow our procedures to ensure students receive effective support, protection, and justice.

We recognise that school staff are uniquely placed to play a significant part in the prevention of harm to our students by ensuring a culture of vigilance where safeguarding is an important part of everyday life, backed by staff trained at every level.

The School community will establish and maintain an ethos, which is understood by all staff, which enables students to feel safe and secure and encourages them to talk knowing they will be listened to. Furthermore we will ensure that all students know that there is an adult in school that they can approach if they are worried or in difficulty

JFS' Child Protection principles are:

- The health, safety and welfare of each student is paramount and their wishes and feelings are taken into account when determining what action to take and what services to provide.
- It is the responsibility of the School to safeguard and actively promote the welfare of children and to support those involved in any child protection concern.
- Students who are and feel safe make more successful learners.
- JFS is a listening school: we encourage every student to make his or her individual voice heard and every member of staff, volunteer and governor to speak out on any safeguarding concern; and we shall always listen and respond appropriately to all that is said.
- All students, regardless of age, gender, ability, culture, race, language, religion, gender identity or sexual identity, have equal rights to protection.
- All members of staff, volunteers, and governors will receive appropriate safeguarding training.
- All students will receive safeguarding guidance for example through focused lessons, tutorials, and assemblies; we will provide opportunities across the curriculum which equips students with the skills and understanding that they need to keep safe from harm.
- All staff have an equal responsibility to act promptly on any suspicion or disclosure that may suggest a child is at risk of harm.
- There is a culture of transparency, openness and, if needed, challenge with regards to maintaining high standards in safeguarding.
- The school will work with external agencies to ensure that risks to children are minimised and concerns are dealt with appropriately and promptly.

“It could happen here” is a vital underpinning principle of our approach to child protection.

2. SAFEGUARDING LEGISLATION, GUIDANCE & DOCUMENTS

General Statutory Guidance:

Education Act 2002

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

Focused Statutory Guidance:

Working Together to Safeguard Children March 2015

This covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of Children. It also provides the framework for Local Safeguarding Children Boards (LSCB) to monitor the effectiveness of local services, including safeguarding arrangements in schools.

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Keeping Children Safe in Education (2016) is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) (England) Regulations 2014 and the Education (Non-Maintained Special Schools) (England) Regulations 2011

Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children. *All staff, volunteers and governors should read and understand Part One and Annex A of this guidance and staff can find a copy on the Staff Handbook on the CRL (Central Resource Library).*

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Counter Terrorism and Security Act 2015 and (Revised) Prevent Duty Guidance – England and Wales July 2015

This covers the duty of schools and other providers, in section 29 Counter Terrorism and Security Act 2015, to have due regard to the need to prevent people being drawn into terrorism.

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Channel Duty Guidance April 2015

Further guidance on providing early support for those at risk of being drawn into terrorism:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf

Serious Crime Act 2015

Relating to the mandatory reporting of FGM:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/416323/Fact_sheet_-_FGM_-_Act.pdf

Teachers' Standards June 2011, updated 2013

This guidance state that teachers, including head teachers should safeguard children's well being and maintain public trust in the teaching profession as part of their professional duties.

Non-Statutory Guidance:

Sexting in Schools and Colleges UKCCIS August 2016

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB__1_.PDF

Use of reasonable force July 2013

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf

Preventing and tackling bullying July 2017

This includes guidance on bullying as a child protection issue

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

Mental health and behaviour in schools March 2016

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508847/Mental_Health_and_Behaviour_-_advice_for_Schools_160316.pdf

Extra-governmental guidance:

NSPCC website, which provides clear guidance on a wide range of safeguarding issues

<https://www.nspcc.org.uk/preventing-abuse/safeguarding/>

<http://www.nspcc.org.uk/services-and-resources/>

Norwood website, which provides confidential support for parents and teachers

Norwood is the largest Jewish charity in the UK supporting vulnerable children and their families:

<http://www.norwood.org.uk/Page/Parent-Advisory-Telephone-Helpline-PATH>

Brent Local Safeguarding Children Board

<http://brentlscb.org.uk>

Regulation of the teaching profession, including misconduct hearings, have been transferred to the **Teaching Regulation Agency (TRA)**, which is again an executive agency of the Department for Education. The Teaching Regulation Agency started operation on 1 April 2018. All other NCTL functions have been moved into the Department for Education.

3. KEY CONTACT DETAILS

SCHOOL

Designated Safeguarding Lead (DSL):

Raynn Bruce Telephone: 020 8206 3236 Email: safeguarding@jfs.brent.sch.uk

Deputy Designated Safeguarding Leads (DDSL) both trained to full DSL level:

Gita Patel Telephone: 0208 206 3100 Email: safeguarding@jfs.brent.sch.uk

Lelanie Grobler Telephone: 0208 206 3100 Email: safeguarding@jfs.brent.sch.uk

Additional and fully trained members of the Safeguarding Team: (ADSL)

Rachel Fink Telephone: 020 8206 3100 Email: fink@jfs.brent.sch.uk

Nominated Safeguarding Liaison Governor who will liaise with the School

Charlotte Benjamin Email: governors@jfs.brent.sch.uk

Chair of Governors

Geraldine Fainer Email: governors@jfs.brent.sch.uk

LOCAL AUTHORITY and POLICE

Local Safeguarding Children's Board (LSCB) Brent Tel: 020 8937/4237/4292

Brent Family Front Door Tel: 020 8937 4300

Out of hours emergency number for Brent LSCB: Tel: 020 8863 5250

Designated Officer Brent (LADO) (Yvonne Prince): Tel: 020 8937 4791/2090

Brent Health Safeguarding Team Tel: 020 8900 5379

Children's Social Care Services, London Borough of Brent Tel: 020 8937 4300

Virtual Head for LAC (Brent) (Nayna Joshi) Tel: 020 8937 4377

Child Missing from Education - Email: cme@brent.gov.uk Tel: 020 8937 3313

POLICE

Brent Child Protection Unit, Edgware Police Station Tel: 020 8733 3562

Brent & Harrow Child Abuse Investigation Team (CAIT) Tel: 020 8733 3530

Anti-terrorist hotline Tel: 0800 789 321

OTHER KEY AGENCIES

Norwood: Parent/Teacher Telephone Advisory Helpline Tel: 020 8457 4490

Ofsted: Email: CIE@ofsted.gov.uk Tel: 0300 123 4666

NSPCC Whistleblowing Helpline - Email: help@nspcc.org.uk Tel: 0800 0208 0285

Child Exploitation and Online Protection Centre (CEOP) Tel: 0870 000 3344

OTHER LOCAL SOCIAL SERVICES DEPARTMENTS

Hertfordshire County Council Tel: 0300 123 4043

London Borough of Barnet Tel: 020 8359 4066

London Borough of Enfield Tel: 020 8379 2483

London Borough of Haringey Tel: 020 8489 4470/0000

London Borough of Harrow Tel: 020 8901 2690/
020 8424 0999

Remember: anyone may make a direct referral when a child is judged at risk or in danger of harm.

4. ROLES AND RESPONSIBILITIES

All members of our school community – staff, volunteers and governors – have a responsibility for safeguarding and to report any safeguarding concern no matter what their role. These are outlined clearly in Part One of Keeping Children Safe in Education and Annex A 2016.

Any member of our school community may make a referral either to a member of our safeguarding team, as guided by this policy, or directly to local children's services or the police.

All school staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the School staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

The School will ensure there is a member of the senior leadership team in the DSL role and that appropriate cover is provided if they are unavailable. This person should have the status and authority within the School to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

Designated Safeguarding Lead (DSL) responsibilities:

Managing referrals:

- a) Refer all cases of suspected abuse to the local authority children's social care and other relevant agencies, including the police.
- b) Support any member of staff who makes a referral to local authority children's social care or to the police.
- c) Refer cases to the Channel programme where there is a radicalisation concern as required and provide support staff who make referrals to the Channel programme.
- d) Work as appropriate with the Headteacher and the nominated governor in relation to the Disclosure and Barring Service (where a person is dismissed or left due to a child protection matter).
- e) Liaise with the Headteacher and the nominated governor to inform them of any ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- f) Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Training:

- a) The DSL should attend appropriate training carried out at least every two years and understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- b) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- c) Ensure each member of staff has access to and understands the School's Safeguarding and Child Protection policy and procedures, especially new and part time staff.
- d) The DSL should ensure that staff members undergo safeguarding and child protection training at induction. All staff should receive regular refresher training, at appropriate intervals, as and when required, but at least annually, to keep up with any relevant safeguarding and child protection developments.
- e) The DSL will recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. They will, therefore, provide opportunities for staff to feed in and shape safeguarding policy.
- f) Understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.

- g) Be alert to the specific needs of children in need, those with special educational needs and young carers.
- h) Be able to keep detailed, accurate, secure written records of concerns and referrals.
- i) Obtain access to resources and attend any relevant or refresher training courses.
- j) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

Raising Awareness:

- a) The DSL should ensure the School policies are known and used appropriately.
- b) Ensure that the School's Safeguarding Policy and Procedures are reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this.
- c) Ensure that the School's Safeguarding Policy and Procedures are available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this.
- d) Link with the Local Safeguarding Children's Board (LSCB) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- e) Where students leave, ensure that the School transfers their child protection file to the new school as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

Annual review:

- a) The DSL will carry out an annual safeguarding audit.
- b) The DSL will work with the nominated governor to prepare an annual report to the governors.
- c) The DSL will advise on any changes in safeguarding policies and procedures which may be required.

The Deputy DSL's responsibilities are, in the absence of the Designated Lead, to carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the Designated Lead, the Deputy will assume all of the functions above.

Governing Body responsibilities:

- a) Nominates a governor who will liaise with the school on safeguarding matters and who will monitor and challenge appropriately the work of the safeguarding team, remembering that the governors have responsibility as a corporate body for safeguarding within the School.
- b) Arranges appropriate annual training for the governing body.
- c) Receives an annual safeguarding audit from the School's safeguarding team.
- d) Ensures that the School creates a culture where the welfare of students is paramount and members of staff and volunteers feel confident to report any concerns.
- e) Ensures that the School complies with their duties under legislation (see section 2 above).
- f) Ensures that the School contributes to inter-agency working and plans.
- g) Ensures that the School takes into account LSCB procedures.
- h) Deals with the LADO through the chair of governors with regard to any safeguarding allegation against the Headteacher.
- i) Ensures that the School has an effective safeguarding policy (updated annually and on website), a whistleblowing policy, a staff Code of Conduct and a Behaviour Policy, which are provided to and followed by all staff.
- j) Ensures that the School has required all members of staff and volunteers to read and understand Keeping Children Safe in Education and where appropriate Annex A of that document.
- k) Ensures that the School has an appropriate response to children who go missing from education and inform and report to the Local Authority when required.
- l) Ensures that the School appoints a Designated Safeguarding Lead who is a member of the senior leadership team, fully and effectively trained, and that the responsibilities are explicit in the role holder's job description; that the DSL should be given time, funding and training to support this; and that there should always be cover for this role.
- m) Ensures that the School has considered how students are taught about safeguarding.
- n) Ensures that the School has evidence of the student voice and that there are systems in place for feedback

and students views.

- o) Ensures that the School has procedures for ensuring that all parents/carers as well as prospective parents have access to and information about safeguarding policy and procedures.
- p) Ensures that the School appoints a designated Looked After Children (LAC) teacher and ensures appropriate training. Ensure members of staff have awareness of this group and their needs including contact arrangements.
- q) Ensures that the School has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Headteacher and allegations against other children. Procedures are in place for referral to the DBS disclosure and barring service.
- r) Ensures that the School has safer recruitment procedures that include statutory checks on staff suitability to work with children and ensures recording of this.
- s) Ensures volunteers are appropriately supervised.
- t) Ensures at least one person on appointment panel is safer recruitment trained.
- u) Regularly audits the single central register of appointments.
- v) Ensures that the School develops a training strategy that ensures all staff, including site staff and the Headteacher, receive information about the School's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated in line with any requirements of the LSCB.

Headteacher responsibilities:

- a) Ensures that the Safeguarding Policy and Procedures and Code of Conduct are implemented and followed by all staff.
- b) Appoints a DSL, Deputy DSL and other members of the safeguarding team.
- c) Allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and Deputy DSL to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings.
- d) Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures.
- e) Ensures that students are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social health and economic education (PHSCE).
- f) Where an allegation is made against a member of staff the Headteacher takes the lead and follows statutory guidance.
- g) Ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service and, if appropriate, to the Teacher Regulation Agency.

Complaints:

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a student, belittling a student or discriminating against them in some way.

Any complaint about a child protection matter should be raised directly with the Headteacher.

Complaints are managed by senior staff, the Headteacher and governors.

A copy of the School's complaints procedure can be found on the School's website.

Complaints from staff are dealt with under the School's complaints and disciplinary and grievance procedures.

5. SUPPORTING VULNERABLE STUDENTS

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

Factors which might indicate increased vulnerability include:

Violence, substance abuse and domestic violence

We recognise that witnessing violence, being the children of substance misusing parents, or misusing legal or illegal substances themselves substantially increases the risk for students and these students may need to be referred for appropriate support and intervention.

Children can "witness" domestic violence in a variety of ways. They may get caught in the middle of an incident in an effort to make the violence stop, they may be in the next room and hear the abuse or see their mother's or father's physical injuries, they may be forced to stay in one room or may not be allowed to play; they may be forced to witness sexual abuse or they may be forced to take part in verbally abusing the victim. All children witnessing domestic violence are being emotionally abused.

Fabricated or Induced Illness

This is a relatively rare but serious form of child abuse where signs and symptoms may be induced or fabricated, this having a significant effect on a child's mental health and development. This is sometimes referred to as Munchausen Syndrome by Proxy. Signs can include high absence from school or an abnormally high number of medical tests and treatments. Often there are claims that the child has symptoms which are unverifiable and no medical practitioner has been consulted.

Mental Health

Symptoms of mental disorders/illness vary depending on the type and severity of the condition. Some general symptoms that may suggest a mental illness include:

- changes in school performance such as falling grades
- inability to cope with daily problems and activities
- changes in sleeping/eating habits
- excessive complaints of physical problems, worry or anxiety
- self-harm.

SEND

Children with special education needs and/or disabilities (SEND) can and do face additional safeguarding challenges.

Barriers may exist which prevent indications of abuse being recognised in the situation of children with these needs.

These may include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's need or disability without further exploration;
- children with SEND can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

JFS will train staff to recognise these barriers and will put in place suitable policies to ensure that these barriers do not prevent staff from recognising safeguarding issues as relating to SEND students.

6. HELPING CHILDREN TO KEEP THEMSELVES SAFE

Students are taught to understand relationships, promote British values and respond to and calculate risk through our personal, social, health and economic (PSHCE) Sex and Relationships (SRE) education lessons and in all aspects of school life.

- a) Our approach is designed to help students to think about risks they may encounter and have help to work out how those risks might be overcome and the support available to them.
- b) Discussions about relationships and risk are empowering and enabling for all students and promote sensible behaviour rather than fear or anxiety.
- c) Generally it is not a safeguarding issue if an LGBT+ young person comes out unless they are at risk from negative reaction from their family or community or they are engaged in underage illegal sexual activity (this is no different to a heterosexual student).
- d) Students are taught how to conduct themselves and how to behave in a responsible manner.
- e) Students are also reminded regularly about online safety and tackling bullying procedures including the legalities and consequences.
- f) Curriculum programmes to prepare young people for both the practical and emotional demands of adulthood and parenthood are important but equally so are the attitudes in society which create a culture in which abuse is more likely to occur. These will be addressed throughout the curriculum.
- g) Examples would include attitudes to women and media representations of violence and this set within the context of the Jewish ethos of the School.
- h) The School continually promotes an ethos of respect for students and the emotional health and wellbeing of our students is important to us.
- i) Students are encouraged to speak to a member of staff in confidence about any worries they may have.
- j) However all our students are made aware that if they disclose that they are being harmed or that they have, or intend, to harm another that this cannot be kept secret.

Online safety

Our students increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children.

- a) The harm might range from sending hurtful or abusive communications, to enticing children to engage in sexually harmful conversations, webcam photography, encouraging radicalisation or face-to-face meetings.
- b) The School's Online Safety Policy explains in more detail how we aim to keep students safe in school. Cyber-bullying and Sexting by students (see below), via texts and emails, will be treated as seriously as any other type of bullying and in the absence of a child protection concern will be managed through our anti-bullying and confiscation procedures.
- c) Chat-rooms and some social networking sites are the more obvious sources of inappropriate and harmful behaviour and students are not allowed to access these sites in school. Some students will undoubtedly be 'chatting' outside school and are informed of the risks of this through the PSHCE/SRE programmes. Parents are encouraged to consider measures to keep their children safe when using social media.
- d) Acceptable IT use for staff, students will be enforced and parents are also informed of expectations (*available on the JFS website, in the Staff Handbook on the CRL*).
- e)

Sexting

The School regards Sexting as a serious safeguarding matter and may be used in a variety of ways including bullying or sexually exploiting children.

- a) There are a number of definitions of sexting but, for the purposes of this document, sexting is defined as images or videos of a sexual or indecent nature generated: by children under the age of 18, or of children under the age of 18.
- b) The images are then shared between many people and/or adults via a mobile phone, handheld device or website, with people they may not even know.

Allegations of abuse made against other children

Peer on peer abuse has a potentially extremely harmful impact on children who are subject to such abuse.

- a) The School's policies including behaviour and anti-bullying are designed to include procedures to minimise the risk of peer on peer abuse and to set out how allegations will be investigated and dealt with.
- b) Peer on peer abuse includes sexually touching and assault or being subjected to initiation/hazing type violence.
- c) Bullying can also be a child protection matter when the threat or use of serious or significant harm is involved.
- d) Bullying in any form should not be tolerated or passed off as 'banter' or 'part of growing up'.

Students who are subject to any form of activity that makes them feel unsafe are encouraged to report any concern that they have to the safeguarding team.

7. SUPPORT FOR THOSE INVOLVED IN A CHILD PROTECTION ISSUE

Child abuse is devastating for the child and can also result in distress and anxiety for any member of staff who becomes involved.

We will support students, their families, and members of staff by:

- a) taking all suspicions and disclosures seriously;
- b) nominating a link person who will keep all parties informed and be the central point of contact;
- c) where a member of staff is the subject of an allegation made by a student, separate link people will be nominated to avoid any conflict of interest;
- d) responding sympathetically to any request from students or staff for time out to deal with distress or anxiety;
- e) maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- f) maintaining and storing records securely;
- g) offering details of helplines, counselling or other avenues of external support;
- h) following the procedures laid down in our whistleblowing, complaints and disciplinary procedures;
- i) cooperate fully with relevant statutory agencies.

8. TYPES AND SIGNS OF ABUSE

Categories and Definitions

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Children may be abused in a family or in an institutional or community setting by those known to them or more rarely, by others (e.g. via the Internet)

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect:

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child Sexual Exploitation (CSE)

Involves exploitative situations where a child, male or female, receives something from an adult as a result of engaging in sexual activity. This can be taking place in situations ranging from seemingly 'consensual' relationships to serious organised crime gangs. There will be an imbalance of power where the perpetrator holds power over the victim. This is a serious crime. The local police team can be contacted for extra support and information, noting that involving the local police does not necessarily take the place of the School's referral procedures.

Signs of sexual abuse or child sexual exploitation may include children who:

- a) appear with unexplained gifts or new possessions
- b) associate with other young people involved in exploitation
- c) have older boyfriends or girlfriends
- d) suffer from sexually transmitted infections or become pregnant
- e) suffer from changes in emotional well-being
- f) misuse drugs and alcohol

- g) go missing for periods of time or regularly come home late
- h) regularly miss school or education or do not take part in education.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- a) provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- b) protect a child from physical and emotional harm or danger
- c) ensure adequate supervision (including the use of inadequate care-givers)
- d) ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Definitions taken from *Working Together to Safeguard Children* (HM Government, 2015).

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures. All students and parents receive a copy of the procedures on joining the School and the subject of bullying is addressed at regular intervals in PHSCE education.

There will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures. If the bullying is particularly serious, or the tackling bullying procedures are deemed to be ineffective, the Headteacher and the DSL will consider implementing child protection procedures.

Children with sexually harmful behaviour

Research indicates that up to forty per cent of child sexual abuse is committed by someone under the age of 18. The management of children and young people with sexually harmful behaviour is complex and the School will work with other agencies to maintain the safety of the whole school community.

Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

Staff who become concerned about a student's sexual behaviour should speak to the DSL as soon as possible.

Position of Trust

The age of consent for sexual activity is 18 years old if you are in a position of trust over that child, noting that some over 18 are regarded by the law as vulnerable adults and therefore unable to give consent.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised.

- a) The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'.
- b) It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty.
- c) However children may have no physical signs or they may be harder to see (e.g. bruising on black skin) therefore staff need to also be alert to behavioural indicators of abuse.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report and record and report to the DSL their concerns – they do not need 'absolute proof' that the child is at risk.

Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried.

For some, full recovery is beyond their reach, and research shows that abuse can have an impact on the brain and its development.

The rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

9. FURTHER SAFEGUARDING ISSUES

There are many issues of concern affecting children today and not all can be listed here.

The School will train members of staff so that there is a consistent approach in relation to following school procedures and consulting with other agencies if there are any concerns with any of our students.

Some of the issues of concern, which are covered by school procedures include:

Missing Children

A child going missing from education, which includes within the school day, is a potential indicator of abuse and neglect, including sexual exploitation.

- a) Unauthorised absences will be monitored and followed up in line with procedures, particularly where children go missing on repeated occasions.

- b) All staff will be aware of the signs of risk and individual triggers including travelling to conflict zones, female genital mutilation (FGM) and forced marriage.
- c) The School will inform the relevant local authority of any student who is going to be deleted from the admission register where they:
 - have been taken out of school by their parents and are being educated outside the School system e.g. home education;
 - have ceased to attend school and no longer live within reasonable distance of the School;
 - have been certified by the School medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the School after ceasing to be of compulsory school age;
 - are in custody for a period of more than four months due to a final court order and the School does not reasonably believe they will be returning to the School at the end of that period; or have been permanently excluded.
- d) The School will notify the relevant local authority when it is to delete a student from its register under the above circumstances.
- e) This will be done as soon as the grounds for deletion are met, but no later than deleting the student's name from the register.

The School will inform the relevant local authority of any student who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authorities concerned (or in default of such agreement, at intervals determined by the Secretary of State).

Safeguarding students from coercive and controlling behaviour

In September 2012 the Home Office announced the definition of Domestic Violence to be implemented in March 2013 and states: "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse: psychological, physical, sexual, financial and emotional"

- a) **Controlling behaviour** is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating everyday behaviour.
- b) **Coercive behaviours** are defined as an act or a pattern of acts of assault, threats, humiliation and intimidation or abuse that is used to harm, punish, or frighten their victim. This definition of controlling behaviour, which is not a legal definition, includes so called "honour" based violence, female genital mutilation (FGM) and forced marriage and is clear that victims are not confined to one gender or ethnic group.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.

- a) It is illegal in the UK and a form of child abuse with long lasting harmful consequences. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.
- b) Those failing to report such cases will face disciplinary sanctions.
- c) It will be rare for teachers to see visual evidence and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

- d) Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.
- e) Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the School's Designated Safeguarding Lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should report their concern to the DSL.

Preventing Radicalisation

The School will intervene where possible to prevent vulnerable children being radicalised.

- a) The Internet has become a major factor in radicalisation and recruitment. We will ensure that safe Internet filters are in place, that unusual or problematic Internet use is monitored effectively, and ensure our students are educated in online safety.
- b) Extremism has been defined by the government as the vocal or active opposition to what have been defined as fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also included in this definition of extremism are calls for the death of members of United Kingdom armed forces, whether in the United Kingdom or overseas.
- c) Protecting children from the risk of radicalisation is part of the safeguarding duties of teachers at JFS. This responsibility is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised and teachers at JFS are expected to respond to concerns that they have about potential radicalisation as they are when concerned about other safeguarding concerns.
- d) Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings.
- e) Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The Internet and the use of social media in particular has become a major factor in the radicalisation of young people.
- f) In this context, members of staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. If teachers' have concerns in relation to a student becoming radicalised, they should contact the DSL, using the established safeguarding processes.
- g) The School is mindful of its duty to pay due regard to 'Revised Prevent Duty Guidance for England and Wales (March 2015)' and 'The Prevent Duty – Departmental Advice for Schools and Childcare Providers (June 2015).' The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.
- h) The School will, as result of the Prevent guidance be further developing the School's procedures: for identifying students at risk; working in partnership with other organisations, such as the Local Safeguarding Children Board; reviewing staff training in relation to radicalisation; reviewing our IT policies, in relation to radicalisation.
- i) The School will ensure that there is effective engagement with parents in any situation where radicalisation is suspected. As they are a key position to also spot any evidence of radicalisation. JFS will assist and advise families who raise concerns and be able to point them to the right support mechanisms. The School will discuss any concerns in relation to possible radicalisation with a child's parents unless there is has a specific reason to believe that to do so would put the child at risk.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. The School will follow requirements of reporting as set out by LSCB.

10. DISCLOSURES OF ABUSE AND REFERRALS

The School actively encourages a ‘never do nothing’ attitude if staff have a concern about a child and promote discussion with DSL if in any doubt.

- a) It is not the responsibility of a member of staff to investigate or decide whether a child has been abused.
- b) Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.
- c) If staff members have any concerns about a child (as opposed to a child being in immediate danger – (see below) they will need to decide what action to take.
- d) Wherever possible, there should be a conversation with the Designated Safeguarding Lead to agree a course of action, although any staff member can make a referral to children’s social care. Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Local Safeguarding Children Board.
- e) If anyone other than the DSL makes the referral it is regarded as good practice for that person to inform as soon as possible the DSL who may have a wider and more detailed understanding.
- f) The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome.
- g) Members of staff should follow up on a referral should that information not be forthcoming. The online tool <https://www.gov.uk/report-child-abuse-to-local-council> directs you to your local children’s social care contact number.
- h) If after a referral the child’s situation does not appear to be improving the Designated Safeguarding Lead (or the person that made the referral) should press for reconsideration to ensure their concerns have been addressed and, most importantly, that the child’s situation improves. If early help is appropriate the Designated Safeguarding Lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.
- i) If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children’s social care if the child’s situation doesn’t appear to be improving. If a teacher, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police (See section on FGM for more detail).
- j) If, a child is in immediate danger or is at risk of harm a referral should be made to children’s social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the Designated Safeguarding Lead the designated safeguarding lead should be informed, as soon as possible, that a referral has been made. Reporting child abuse to your local council directs you to your local children’ social care contact number.

Key points for staff to remember for taking action are:

- if an emergency take the action necessary to help the child, for example, call 999 or refer to the children’s services of the area in which the child lives;
- **Report your concern to the DSL as soon as possible and certainly by the end of the day;**
- **Complete a record of concern pro-forma** (*accessible in the Staff Handbook on the CRL*);
- do not start your own investigation;
- share information on a need-to-know basis only – do not discuss the issue unnecessarily with colleagues, friends or family;
- seek support for yourself if you are distressed.
- see Appendix III - Flow chart for Raising Safeguarding Concerns about a Child.

If you are concerned about a student’s welfare

There will be occasions when staff may suspect that a student may be at risk, but have no ‘real’ evidence. The student’s behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that

reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, **staff will give the student the opportunity to talk.**

The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine for staff to ask the student if they are OK or if they can help in any way.

Staff should record these early concerns and raise them with a member of the safeguarding team. If the student does begin to reveal that they are being harmed, staff should follow the advice below.

Following an initial conversation with the student, if the member of staff remains concerned, they should discuss their concerns with the DSL.

If a student discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the student know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the student this is a matter for professional judgement.

If they jump in immediately the student may think that they do not want to listen, if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the students it is best practice for staff:

- a) allow students to speak freely
- b) remain calm and not overreact – the student may stop talking if they feel they are upsetting their listener
- c) give reassuring nods or words of comfort – ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- d) do not be afraid of silences, and allow space and time for student to continue, staff will recognise the barriers the student may have had to overcome to disclose
- e) do clarify or repeat back to check what they have heard if needed but do not lead the discussion in any way and do not ask direct or leading questions – such as...whether it happens to siblings too, or what does the student’s mother think about it
- f) use open questions such as, ‘Tell me...?’ ‘Is there anything else?’
- g) at an appropriate time tell the student that in order to help them, the member of staff must pass the information on
- h) do not offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- i) remember professional boundaries and not share personal experiences such as ‘that happened to me’
- j) avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the child to mean that they have done something wrong
- k) tell the student what will happen next: the student may agree to go with you to see the Designated Safeguarding Lead; otherwise let them know that you will be consulting the DSL
- l) write up their conversation as soon as possible on the record of concern form and hand it to the designated lead
- m) seek support for them

Notifying parents

The School will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL will be in the most informed position to make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from Social Care Direct.

For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents’ wishes.

11. RECORDS AND MONITORING

Why recording is important

Our staff will be encouraged to understand why it is important that recording is timely, comprehensive and accurate and what the messages are from serious case reviews are in terms of recording and sharing information.

Cause for concerns forms

Any concerns about a child will be recorded as soon as possible and definitely within 24 hours.

- a) All records will provide a factual and evidence based account and there will be accurate recording of any actions. Records will be signed, dated and, where appropriate, witnessed.
- b) At no time will a staff take photographic evidence of any injuries or marks to a child's person. The body map will be used instead in accordance with recording guidance: no part of the body not normally clothed should be examined.
- c) It may be appropriate for the DSL to open a secure safeguarding file and start a chronology page. This will help in building patterns and decision-making.

We will feedback to the staff member any actions, however this will be on a need to know basis. It may not be appropriate for staff members to know every detail of the child's life.

The Safeguarding file

The establishment of a safeguarding file is an important principle in terms of storing and collating information about children which relates to either a safeguarding concern or an accumulation of welfare concerns which are outside of the usual range of concerns in ordinary life events.

- a) It needs to be borne in mind that what constitutes a 'concern' for one child may not be a 'concern' for another and the particular child's circumstances and needs will differ i.e. a child subject to a child protection plan, looked after child,
- b) A Child in Need may be looked at differently to a child recently bereaved, parental health issues etc.
- c) We will therefore use professional judgement when making this decision as will have clear links and discussions between pastoral staff and the DSL.
- d) This file will be kept separately from the main student file and **will be held securely only to be accessed by appropriately trained people.**
- e) **The main file will have a marker to signify that a separate file exists for that child.**
- f) The School will keep written records of concerns about children even where there is no need to refer the matter to external agencies immediately. Each child will have an individual file i.e. no family files.
- g) All incidents/episodes will be recorded e.g. phone calls to other agencies, in the chronology with more detail and analysis in the body of the file. This will help build a picture and help the DSL in analysis and action, which may include no further action, monitoring, whether a CAF should be undertaken, or whether a referral should be made to other agencies - Social Care Direct/Early Help Hubs in line with the Continuum of Need document and reflecting the Signs of Safety approach.
- h) In cases where there is multi agency involvement - meetings and plans, actions and responsibilities shall be clarified and outcomes recorded.
- i) **Files will be made available for external scrutiny for example by a regulatory agency or because of a serious case review or audit.**
- j) Records will be kept up to date and **reviewed regularly by the DSL** to evidence and support actions taken by staff in discharging their safeguarding arrangements.
- k) The file can be non-active in terms of monitoring i.e. a child is no longer a looked after child (LAC), subject to a child protection plan. If future concerns then arise it can be re-activated and indicated as such on the front sheet and on the chronology as new information arises.
- l) If the student moves to another school, the file will be securely sent or taken, to the DSL at the new establishment/school and a **written receipt will be obtained.** There will be a timely liaison between each

school's DSL to ensure a smooth and safe transition for the child. We will retain a copy of the chronology to evidence actions, in accordance with record retention guidance.

Referral to Social Care Direct

- a) The DSL will make a referral to Social Care Direct if it is believed that a student is suffering or is at risk of suffering significant harm.
- b) If there is already a social worker assigned to this case for safeguarding reasons, the social worker should also be contacted.
- c) The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.
- d) If the situation does not appear to be improving, the School will press for reconsideration.
- e) Any member of staff may refer to other agencies in exceptional circumstances, for example: in an emergency or when there is a genuine concern that action has not been taken.

Confidentiality and sharing information

Staff will only discuss concerns with the Designated Safeguarding Lead, Headteacher or Chair of Governors (depending on who is the subject of the concern).

That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

We will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL will be in the most informed position to make contact with the parent in the event of a concern, suspicion or disclosure.

However, if we believe that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from Social Care Direct.

The Seven Golden Rules for Safeguarding Information Sharing:

- 1) Data Protection/Human rights laws are not a barrier
- 2) Be open and honest (unless unsafe or inappropriate)
- 3) Seek advice (anonymise if necessary)
- 4) Share with consent if appropriate
- 5) Consider safety and wellbeing
- 6) Necessary, proportionate, relevant, adequate, accurate, timely and secure
- 7) Keep a record of decision and reason for it

See:

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. Ideally information sharing will be done in writing so that there is an evidence trail however there may be occasions where this method is too slow. **In cases where agencies such as MASH (Multi Agency Safeguarding Hub) ring the School requesting information reception staff will take a message and inform the DSL immediately**, the DSL will ensure they can identify who is requesting the information before sharing and then record what has been shared, when, why and with whom.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Headteacher.

Any personal safeguarding information shared with external agencies will be done so securely e.g. by secure email, password protected or recorded delivery.

12. ALLEGATIONS AGAINST STAFF AND GENERAL CONCERNS

Staff who are concerned about the conduct of a colleague or safeguarding practices within the School are undoubtedly placed in a very difficult situation. However, all staff must remember that the welfare of the child is paramount and staff should feel able to report all concerns about a colleague or the safeguarding practice within the School.

- a) The School's Whistleblowing Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.
- b) All concerns of poor practice or possible child abuse by colleagues should be reported directly and immediately to the Headteacher without informing the colleague or colleagues concerned or any other person.
- c) Complaints about the Headteacher should be reported to the chair of governors without informing the Headteacher or any other person.
- d) Staff may also report their concerns directly to Social Care Direct, the LADO or the police if they believe direct reporting is necessary to secure action.

Confidentiality must be maintained unless otherwise directed by the LADO or police. Staff, parents, and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. We will communicate this to all parties.

When an allegation is made against a member of staff, set procedures must be followed.

It is important to have a culture of openness and transparency and a consultation with the Designated Officer, initially on a 'no-names' basis if appropriate, will happen if a member of staff has:

- a) behaved in a way which has harmed, or may have harmed a child;
- b) possibly committed a criminal offence against or related to a child or
- c) behave towards a child or children in a way that indicates they would pose a risk of harm to children.

It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. We recognise that a student may also make an allegation against an innocent party because they are too afraid to name the real perpetrator or for malicious reasons.

If a child is found to continually make false allegations this may be a sign of mental health issues and a referral to services such as CAMHS (Child and Adolescent Mental Health) may be required. If the allegation is found to be malicious the child can be disciplined (following application of the relevant statutory guidance).

An uncomfortable fact is that some professionals do pose a serious risk to students and the School must act on every allegation.

Any member of staff who is the subject of an allegation, however, has the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered.

In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. Staff will be advised to contact their trade union and will also be given access to a named representative.

Allegations against staff should be reported to the Headteacher. Allegations against the Headteacher should be reported to the Chair of Governors. Staff may also report their concerns directly to police or Designated Officer if they believe direct reporting is necessary to secure action.

The full procedures for dealing with allegations against staff can be found in *Keeping Children Safe in Education (DfE, 2016)*.

13. STAFF TRAINING AND INDUCTION

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

- a) All staff, including site staff and the Headteacher, will be regularly trained in Safeguarding.
- b) The DSL will receive training at least every two years, including training in inter-agency procedures. They will be supported and encouraged to attend additional training to keep up to date, including forums and multi-agency training offered by LSCB and the Safeguarding Advisor.
- c) Governors will receive strategic governor safeguarding training at least annually.
- d) All members of staff and volunteers will receive regular updates on safeguarding as and when required and at least annually.
- e) All training will be recorded and monitored to flag in advance when updates are required.
- f) The booklet 'What to do if you're worried a child is being abused' March 2015 provides helpful guidance:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

as does Part One of Keeping Children Safe in Education and Annex A September 2016.

- g) New staff and governors will receive an induction in safeguarding which includes the School's Safeguarding and Child Protection Policy, details for the DSL, reporting and recording arrangements specific to the School, dates of their last training, the staff Code of Conduct, the Whistleblowing Policy and any other information specifically relevant to the safeguarding circumstances of the School.
- h) All members of staff, volunteers and governors will sign to agree that they have received and understood Part 1 and Annex A of Keeping Children Safe in Education (2016).
- i) Supply staff and other visiting staff (see also Visiting Speakers Policy) will be given the School's **(Visiting Staff Leaflet)** with a brief summary of the above.
- j) All visitors will be provided with a brief written outline of the School's approach to safeguarding and whom they should contact in case of a concern
- k) We will work with 1440, Caterlink and any other PFI companies to keep a shared log that ensures that all their staff, even cover staff have signed an agreement that they have read and understood the Schools Brief written outline of the School's approach to Safeguarding and whom they should contact in case of a concern
- l)

Use of reasonable force

- m) All staff are encouraged to use de-escalation techniques and creative alternative strategies that are specific to the child and guidance is provided. Restraint will only be used as a last resort and all incidents of this are reviewed, recorded and monitored. Reasonable force will be used in accordance with government guidance.

Intimate care

- n) If a child requires regular intimate care on site this is likely to be written into a care plan which staff will adhere to: guidance and training will be provided for those staff concerned. If an accident occurs and a child needs assistance with intimate care this will be risk managed to afford dignity to the child as well as security to the staff member. Staff will behave in an open and transparent way by ensuring that another appropriate adult is in the vicinity and is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible. Adults will have the child's consent to help. Parents will be informed and incidents recorded.

14. SAFER RECRUITMENT

Our school endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education (2016).

Recruitment, selection and pre-employment vetting is carried out in accordance with Keeping Children Safe in Education 2016, including but not only as appropriate:

- Verifying identity
- Enhanced DBS (disclosure and barring service) check for those in regulated activity
- Verification on mental and physical fitness
- Right to work in UK
- Professional qualifications
- Prohibition from teaching and management orders

At least two references will be sought before interview so any concerns can be explored.

At least one member of each recruitment panel will have attended safer recruitment training.

The Single Central Record is maintained in accordance with Keeping Children Safe in Education 2016.

We will obtain written confirmation from supply agencies that agency and third party staff have been appropriately checked.

Volunteers

Volunteers, including governors, will undergo checks commensurate with their work in the School and contact with students i.e. if they are in regulated activity or not.

Contractors

We will work with 14Forty (premises management company) to ensure that they have suitable and effective checks on all contractors working on site to ensure that they comply to current safeguarding expectations and health and safety expectations.

15. SITE SECURITY AND OFF-SITE ARRANGEMENTS

- a) All members of staff are expected to wear their School identification badge and lanyard at all times whilst on site.
- b) Visitors to the School are required to show ID and sign in (and out), and are given a badge, which confirms they have permission to be on site.
- c) Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to enter through one entrance and observe the School's safeguarding and health and safety regulations to ensure children in school are kept safe.
- d) No person without a current and clear DBS check will be allowed unsupervised access to the School.
- e) The Headteacher will exercise professional judgement in determining whether any visitor with a confirmed DBS check in place should be escorted or supervised while on site.
- f) Where extended school activities are provided by and managed by the School, our own Safeguarding and Child Protection policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures and clarify whose procedure is to be followed if there are concerns. There will be clear communication channels to ensure the DSL is kept appropriately informed.
- g) When our students attend off-site activities, including day and residential visits and work related activities, we will risk assess and check that effective child protection arrangements are in place. We will clarify with those leading the trip or visit which procedures are to be followed, with the DSL kept appropriately informed.
- h) The risk assessment for any trip or visit will include clear safeguarding guidance relevant for that trip or visit.
- i) If alternative providers are used we will ensure they have effective safeguarding in place, with the DSL kept appropriately informed.

16. PHOTOGRAPHY AND IMAGES

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and acceptable reasons.

Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect students we will:

- a) seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- b) seek parental consent
- c) not use students full name with an image
- d) ensure students are appropriately dressed
- e) ensure that personal data is not shared
- f) store images appropriately, securely and or no longer than necessary
- g) only use school equipment, i.e. not personal devices
- h) encourage students to tell us if they are worried about any photographs that are taken of them

Members of staff should not use personal cameras or mobile technology to record or otherwise store images of students at the school.

Written permission to photograph students should be sought from a member of the safeguarding team and a school device will be provided for this purpose.

17. SPECIAL CIRCUMSTANCES

Looked after Children

The most common reason for children becoming looked after is as a result of abuse or neglect. The School ensures that appropriate members of staff have information about a child's looked after status and care arrangements including contact. The designated teacher for Looked After Children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

Supporting Students in school with medical conditions

Section 100 of the Children and Families Act 2014 places a duty on schools to make arrangements for supporting students at their school with medical conditions. Individual Health care Plans may need to be drawn up and multi-agency communication will be essential. Staff will be appropriately trained and responsibilities will be carried on in accordance with government guidance Sept 2014.

Work Experience

The School has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervise students on work experience which are in accordance with the guidance in *Keeping Children Safe in Education*.

Children on overseas and exchange trips

Students from the School take part in trips which involve extended visits to other countries (notably, to Israel and Poland). These trips are organised in accordance with the School's visits policy. Where volunteers, educators and trip guides are involved in supporting students during these trips and may be working with students unsupervised by members of JFS Staff, the School will ensure that DBS checks are made for these members of staff.

School arrangements for students to stay with a host family during a foreign exchange trip or sports tour: In such circumstances this may amount to Private Fostering and the School follows the guidance in *Keeping Children Safe in Education*, Annex E to ensure that hosting arrangements are as safe as possible.

Currently, our students do not undertake exchange visits with families from overseas. If the School starts to undertake such trips, the School will work with the local authority to check that both the visit and host arrangements are safe and suitable.

18. RELATED POLICIES and PROCEDURES

This policy is one of a series in the School's integrated safeguarding portfolio. It should be considered alongside Health and Safety legislative requirements, including:

- Staff Code of Conduct
- Use of reasonable force (Behaviour Policy)
- Supporting students with medical conditions (Medical Policy)
- Online safety (Use of Internet and School Network and E-Safety Policy)
- Behaviour
- Personal and intimate care (see Staff Code of Conduct)
- Complaints Procedure
- Tackling bullying (See Behaviour Policy)
- Whistleblowing (Confidential Reporting)
- Special Educational Needs and Disability (SEND)
- Allegations of abuse against staff
- Grievance Procedure (Staff)
- Disciplinary and Capability Procedures for (Staff)
- Sex and Relationships Education (SRE)
- Risk assessments for educational visits

Appendix I

JFS SAFEGUARDING CONCERN RECORDING SHEET

Please complete this pro forma if:

- i) You suspect that there is a safeguarding concern, affecting a JFS student;
- ii) If a student discloses to you something that you consider to be a safeguarding concern;

If you are not sure whether the situation requires you to complete the form, please consult with the Designated Safeguarding Lead or the Deputy Safeguarding Lead(s). If a child is deemed at risk of significant harm, a referral to children's social care will be made. This information will be disclosed only to those staff who need to know for the purposes of child protection. Please write legibly and do not use acronyms. Exact words must be used even if they may offend.

Date of alleged incident:		Date and time of disclosure:	
Name of student(s):		Class/ Tutor Group:	
Name of person making this record:		Role in school:	
Signed as a true record:		Date: DD/MM/YY	

Nature of concern:

Either record:

i) The reason that you have a safeguarding concern. If the reason is as a result of something physical you have noted e.g. an injury to the student's body, please use the body map on the next page

ii) What a student has disclosed to you, which has led you to believe that there is a safeguarding concern – please ensure that your notes record the student's precise words and avoid paraphrase.

These notes should be made as soon as possible after the disclosure has taken place. Please do not express any judgement, either to the student or in these notes.

Please record the details of any potential witnesses to any incident recorded here

Attach additional sheet(s) if necessary

Body map used (PTO)	Yes		No	
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Body Map

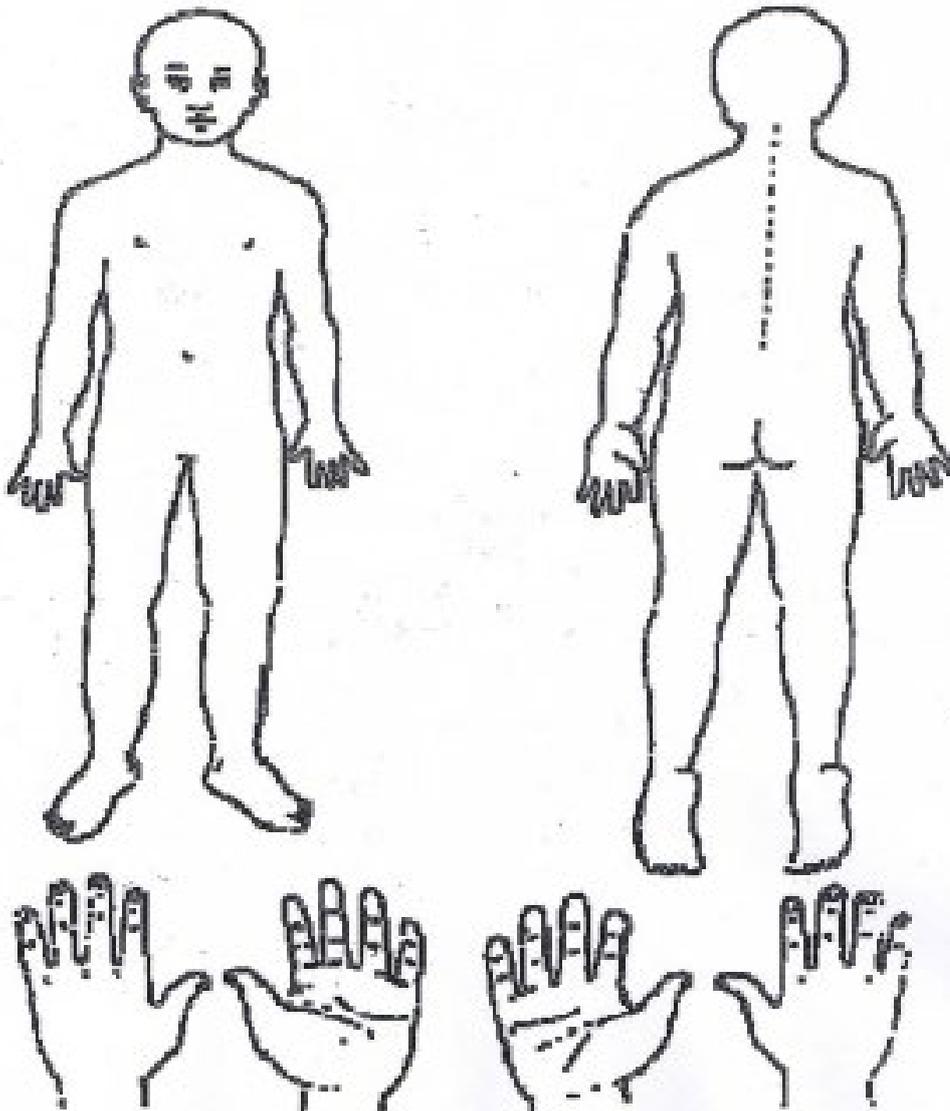
If you note any physical evidence, which has led you to conclude that there is a safeguarding concern, with respect to a particular student, please print this page, and mark/draw/note (as accurately as possible) what you have seen on the body map (below).

Please give this, as soon as possible, to the Designated Safeguarding Lead, the Deputy Safeguarding Lead, or any other member of the Safeguarding Team.

If a child is deemed at risk of significant harm, a referral to children's social care will be made.

Under no circumstances should you view or ask a student to show any part of their body not normally visible when fully clothed.

Date concern noted		Date/time of report	
Name of student		Class	
Name of person making this record (please print)		Role in school	
Signed as a true record		Date DD/MM/YY	



FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD

