



**JFS School**

The Mall, Kenton, Harrow, Middlesex HA3 9TE

## **SAFEUGARDING POLICY 2021-2022**

*Reviewed in the Autumn Term 2021 and Ratified by BAPD and Safeguarding on 11.10.2021  
Next due for review in the Autumn Term 2022 subject to intervening legislation*

### **OUR APPROACH**

JFS is committed to the vital contribution all teaching staff, support staff and governors make to safeguarding children. We aim to ensure that Child Protection concerns and referrals are handled sensitively, professionally and in ways that support the specific needs of the individual child. Through providing a caring, safe and stimulating environment which promotes the spiritual, moral social and cultural development of all our students, we aim to foster an atmosphere of trust, respect and security in which all pupils can strive.

### **SCOPE OF THE POLICY**

This policy applies to all staff within JFS. It should be read with conjunction with all other policies and in particular the policy on Safer Recruitment.

Due to the all-encompassing nature of safeguarding, this policy is divided into several sections.

**SECTION A:** [SAFEGUARDING AND CHILD PROTECTION POLICY](#)

**SECTION B:** [SAFEGUARDING STANDARDS REQUIRED OF STAFF](#)

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## **SECTION A**

This policy has been drawn up in line with “Keeping Children Safe in Education”, 1 September 2021.

School’s legal duty to safeguard vulnerable individuals is set out in:

- Keeping Children Safe in Education, 1 September 2021
- Working Together to Safeguard Children, July 2018
- The Children Act 2004
- The Education Act 2002
- OFSTED’S Education Inspection Framework, September 2019
- The Counter Terrorism and Security Act 2015
- Mandatory reporting of FGM – procedural information, October 2015

### **1. DEFINITION OF SAFEGUARDING**

Protecting children from maltreatment

- Preventing impairment of children’s mental or physical health or development
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

### **2. SAFEGUARDING CONCERNS**

- Abuse
- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) ☐ Female genital mutilation
- Mental Health
- Peer on peer abuse
- Serious Violence
- County Lines
- Online Safety including online bullying
- Radicalisation and/or extremist behaviour or vulnerability to radicalisation
- Child Abduction and community safety incidents
- Children and the Court System
- Children missing from education
- Children with family members in prison
- Modern Slavery and the National Referral Mechanism
- Cybercrime
- Domestic abuse
- Homelessness
- Honour based Abuse
- Forced Marriage
- Sexual violence and sexual harassment between children
- Upskirting
- Bullying including prejudice-based bullying
- Racist, disability and homophobic or transphobic abuse
- Issues that may be specific to a local area or population, for example children affected by gang activity and youth violence
- Other issues not listed here but pose a risk to children, young people and vulnerable adults.

## **Safeguarding relates to broader aspects of care and education, including:**

- Children's and learners' health and safety and well-being
- The use of reasonable force
- Meeting the needs of children and learners with medical conditions
- Providing first aid
- Educational visits
- Intimate care and emotional well-being
- Online safety related to a wide range of issues related to content, contact and behavioural issues
- Appropriate arrangements to ensure children's and learners' security, considering the local context.

### **3. DEFINITIONS, SIGNS AND INFORMATION**

**3.1 ABUSE:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**3.2 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 maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school.
- Poor concentration.
- Affection or attention needing behaviour.
- Illnesses or injuries that are left untreated; failure to organise medical appointments
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.

**3.3 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. The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Wounds and scars
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or Isolation from peers.

**3.4 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 act of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.
- Attention needing behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.
- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

**3.5 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 children 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. 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.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis. N.B.: Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

**3.6 CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE):** Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

- **Child Sexual Exploitation (CSE)** CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

- **Child Criminal Exploitation (CCE)**  
Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not

always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

The following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions.
  - associate with other children involved in exploitation.
  - suffer from changes in emotional well-being.
  - misuse drugs and alcohol.
  - go missing for periods of time or regularly come home late; and
  - regularly miss school or education or do not take part in education.
- 
- Some additional specific indicators that may be present in CSE are children who:
  - have older boyfriends or girlfriends; and
  - suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

**3.7 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. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.** Whilst **all** staff should speak to the designated safeguarding lead (or deputy) about any concerns about female genital mutilation (FGM), **there is a specific legal duty on teachers.** If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. Those who fail to report such cases may face disciplinary sanctions. Teachers will rarely see visual evidence and they should not examine pupils or students.

**3.8 MENTAL HEALTH:** Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

We offer support for the mental health for all pupils. These measures include online resources, a programme of personal development and regular contact with their teachers and other staff within the school. Further support will be provided by Senior Leaders or the DSLs as needed and, where appropriate, specialist external support is provided through working with CAHMS, BCYP, WEST, etc.

Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Rise Above](#) for links to all materials and lesson plans.

If staff have a mental health concern about a child that is also a safeguarding concern, they should immediately speak to the designated safeguarding lead or a deputy.

If required, when setting expectations for pupils learning remotely and not attending school, teachers will bear in mind the potential impact on both children's and adults' mental health. We will respond to feedback to ensure we support families as best as possible.

We recognise that school closure did have detrimental impact on the mental health of pupils and staff over time and we are providing further mental health support as the school returns to its 'normal' operation.

**3.9 PEER ON PEER ABUSE:** This policy reflects the whole school approach to peer on peer abuse as set out in (KCSIE 2021 para 145).

The school takes the peer-to-peer abuse very seriously. We educate our students and train our staff throughout the year to make sure that there is a culture of openness and that staff are vigilant. Our 'It's not just banter' tagline means that students understand that peer on peer abuse is taken seriously and will be seriously dealt with.

There are arrangements (DSL and safeguarding team accessibility, suggestion boxes, safeguarding email, in place to encourage pupils to report abuse (confidentially or anonymously). These are easily understood and accessible.

We minimise the risk of peer-on-peer abuse through:

- Staff vigilance
- Staff training
- Encouraging students to report abuse by giving them mechanisms to report abuse and open access to the DSL/DDSL/Safeguarding Team
- Taking appropriate actions when abuse is reported
- Our comprehensive programmes of education (PHSCE, RSE, Jewish Studies)
- The curriculum subjects
- Engagement of a range of external organisations and providers who support us in this work.

Allegations of peer-on-peer abuse are recorded, investigated, and dealt with by senior staff and DSLs.

DSLs and pastoral staff will, depending on the specifics of the allegations, make arrangements to support the victims, perpetrators and any other children affected by peer-on-peer abuse. This may involve a range of strategies from school-based support to support from external agencies. Parents will usually be informed and involved.

We understand that even if there are no reported cases of peer-on-peer abuse – it happens here and may just not be reported.

We have a zero-tolerance approach to abuse, and do not pass it off as banter nor just having a laugh. We promote the highest standards of behaviour which makes the school a safe place.

We ask the students of places/areas where they may not feel safe (in and out of school) and make sure that concerns in these areas are addressed (e.g. lighting, cameras, extra supervision, etc.). We have staff on duty before school, at break, lunch and after school to ensure the students are supervised at all times and cannot congregate in corridors or bathrooms.

There is an understanding that it is more likely that girls will be victims and boys' perpetrators, but we understand that all peer-on-peer abuse is unacceptable.

The different forms peer on peer abuse includes:

bullying (including cyberbullying, prejudice-based and discriminatory bullying)

- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Our curriculum addresses the different forms of abuse so that children understand the inappropriateness of these behaviours.

We use the UKCIS (UK Council for Internet Safety) Education Group's advice on published sharing nudes and semi-nudes which outlines how to respond to an incident of nude and semi-nude being shared. Consensual image sharing, especially between older children of the same age, may not be abusive but children are taught that it is illegal, whilst non-consensual is illegal and abusive.

We have incorporated the DfE's guidance on Searching Screening and Confiscation.

We understand the following constitute sexual violence and harassment:

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals.

Our reporting systems follow the guidance set out in KCSIE 2021 paragraph 83;

- Where there is a safeguarding concern, we ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- We proactively encourage children to express their views and give feedback. Our surveys and interviews (which take place several times a year) are acted upon and feedback from children is valued.
- We work closely with our safeguarding partners and understand the locally agreed multi-agency safeguarding arrangements. We understand what makes a strong referral and how to contact the LADO (Mona Cook, Designated Officer, 020 8937 2057) or Brent Family Front Door (Family.FrontDoor@brent.gov.uk , 020 8937 4300).
- We know that we will be asked by Brent Family Front Door to give a brief description of the allegation and concerns raised, the location of the alleged incident, the date of the incident and the number of children involved.

**3.10 SERIOUS VIOLENCE:** Staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups ☒ a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs

Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery.

**3.11 COUNTY LINES:** We recognise that we work in an area where drug crime is prevalent. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK - no specified distance of travel is required.

Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime).
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing

### **Signs to look out for**

A young person’s involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a person’s lifestyle should be discussed with them. Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls and/or having multiple handsets
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being.

**3.12 MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM (NRM):** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.

**3.13 DISABLED CHILDREN:** When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child's means of communication.
- Ill-fitting equipment e.g. callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

**3.14 INDICATORS OF VULNERABILITY TO RADICALISATION:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as: The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts
- Foster hatred that might lead to inter-community violence in the UK.

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

a) Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.

- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

b) More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and / or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

c) The Designated Safeguarding Lead are Cristalina Fernandes, Paul Ramsey, Gita Patel and Lelanie Grobler. They are responsible for ensuring that:

- Staff of the school are aware that they are the DSLs in relation to protecting students/pupils from radicalisation and involvement in terrorism.
- A good understanding of the relevant guidance is applied in relation to preventing students/pupils from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Awareness is raised about the role and responsibilities of JFS in relation to protecting students/pupils from radicalisation and involvement in terrorism.
- Monitoring the effect in practice of the school's RE/Jewish Studies? curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs.
- Raising awareness within the school about the safeguarding processes relating to protecting students/pupils from radicalisation and involvement in terrorism.
- Acting as the first point of contact within the school for case discussions relating to students / pupils who may be at risk of radicalisation or involved in terrorism.
- Collating relevant information from agencies in relation to referrals of vulnerable students / pupils into the Channel process.
- Attending Channel meetings as necessary and carrying out any actions as agreed; and
- Reporting progress on actions to the Channel Co-ordinators in Brent (PREVENT contact is Duvual Akonor – Prevent Engagement Officer and the Brent Prevent Manager is Kibibi
- Octave, [Kibibi.Octave@brent.gov.uk](mailto:Kibibi.Octave@brent.gov.uk) Tel: 020 8937 4225 Mob: 07944 560 744) and sharing any relevant additional information in a timely manner (Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity).

d) Safeguarding pupils vulnerable to extremism:

- Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- JFS values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both pupils/students and teachers have the right to speak freely. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. JFS is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- JFS seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- Numerous factors can contribute to and influence the range of behaviours that are defined
- as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

e) Risk reduction:

- The school Governors, the Headteacher and the Designated Safeguarding Leads will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessments include consideration of the school's SRE curriculum, SEND policy, assembly policy, the use of school premises by external agencies, integration of pupils by gender and SEN, antibullying policy and other issues specific to the school's profile, community and philosophy.
- When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the safeguarding leads or the Headteacher and complete a safeguarding referral form. Referrals are passed on to the Prevent team, which the school works closely with.
- All staff will complete Level 2 Training on the Prevent Duty from Educare as part of TES an accredited provider in 2021-22. Prevent face to face training is planned the future
- Our safeguarding policy along with the school's values, ethos and behaviour policies provides the basic platform to ensure children and young people are given the support to respect themselves and others, stand up for themselves and protect each other.
- Our school keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
- Our staff are supported to recognise warning signs and symptoms in relation to specific issues include such issues in an age appropriate way in their curriculum.
- Our school works with and engages our families and communities to talk about such issues
- Our staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
- Our Designated Safeguarding Leads know where to seek and get advice as necessary.
- Our school brings in experts and uses specialist material to support the work we do.

f) What we do when we are concerned:

Where risk factors are present but there is no evidence of a particular risk then our DSLs advise us on preventative work that can be done within school to engage the pupil into mainstream activities and social groups. The DSL may well be the person who talks to and has conversations with the pupil's/student's family, sharing the school's concern about the young person's vulnerability and how the family and school can work together to reduce the risk. In this situation, depending on how worried we are and what we agree with the parent and the young person (as far as possible) the DSLs can decide to notify the Multi-Agency Safeguarding Team of the decision so that a strategic overview can be maintained and any themes or common factors can be recognised.

The DSLs will offer and seek advice about undertaking an early help assessment such as the family Common Assessment Framework (CAF) and/or making a referral to children's social care. If the concerns about the pupil/student are significant and meet the additional needs/complex need criteria, they will be referred to the Brent or appropriate Local Authority Safeguarding Lead. This includes concerns about a child/young person who is affected by the behaviour of a parent or other adult in their household. The school will review the situation after taking appropriate action to address the concerns.

#### **4. KEY PRINCIPLES**

These are the key principles of safeguarding at JFS:

- Always see the child first.
- Never do nothing - Be vigilant and proactive.
- Do with, not to, others.
- Do the simple things better.
- Build safe and trusted relationships.
- Outcomes not outputs.

Every child is entitled to a broad and balanced curriculum. JFS operates with public money: this should be spent wisely, targeting resources on the evidenced needs of children at school now. Assurance and audit are important aspects of this. Governance is corporate and decisions are collective, but individual governors can and should take the lead on specific aspects of school life such as safeguarding. When issues arise, the Headteacher will address them internally where possible and escalate them when this is necessary.

#### **5. KEY PROCESSES**

All staff are trained using the safeguarding and Child Protection Policy and are expected to read and sign acknowledgement of it as well as complete a short quiz on the knowledge acquired through their reading and face to face CPD. Staff are also given a range of policies to read, adhere to, and sign acknowledgement of them annually. Every week the staff bulletin highlights an aspect of safeguarding. Staff briefings are used to ensure staff are kept up to date. Further staff training and CPD is delivered throughout the academic year and on Inset days on key safeguarding issues, including responding to the latest issues, both locally and nationally. Staff are regularly surveyed and quizzed on their safeguarding understanding and further training is arranged as required.

#### **6. EXPECTATIONS**

All staff and visitors will:

- Be familiar with this safeguarding and child protection policy, including related policies such as e- safety policy.
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.
- Be involved in the implementation of individual education programmes, integrated support plans, Child in Need plans and interagency Child Protection plans.
- Be alert to signs and indicators of possible abuse.
- Record concerns and give the records to the Designated Safeguarding Leads;

- Deal with a disclosure of abuse from a child in line with this guidance - you must inform the Designated Safeguarding Lead immediately, and provide a written account as soon as possible; and
- All staff have completed four Level 2 Training courses with an accredited provider (Educare as part of TES) which covered Child Protection in Education, Raising Awareness of Child on Child Peer Abuse, The Prevent Duty and a Practical Guide to GDPR in Education, and senior staff have completed Level 3 Child Protection Training.

## **7. THE DESIGNATED SAFEGUARDING LEADS**

Our Designated Safeguarding Leads are Cristalina Fernandes, Paul Ramsey, Gita Patel and Lelanie Grobler. The DSLs have lead responsibility and management oversight and accountability for child protection and, will be responsible for coordinating all child protection activity.

- The Designated Safeguarding Leads will lead regular case monitoring reviews of vulnerable children. These reviews must be evidenced by minutes and recorded in case files.
- When the school has concerns about a child, the Designated Safeguarding Leads will decide what steps should be taken and should inform the Headteacher.
- Child Protection information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the Designated Safeguarding Leads feel their having knowledge of a situation will improve their ability to deal with an individual child and / or family. A written record will be made of what information has been shared, with whom, and when.
- Child Protection records will be stored securely in a central place separate from academic records. Individual files will be kept for each child. Files will be kept for at least the period during which the child is attending the school, and beyond that in line with current data legislation and guidance.
- Access to these records by staff other than by the Designated Safeguarding Leads will be restricted, and a written record will be kept of who has had access to them and when.
- Parents will be aware of information held on their children and kept up to date regarding any concerns or developments by the appropriate members of staff. General communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility.
- We do not disclose to a parent any information held on a child if this would put the child at risk of significant harm.
- If a pupil/student moves from our school, Child Protection records will be forwarded on to the Designated Safeguarding Leads at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. We will record where and to whom the records have been passed and the date.
- “Special/Recorded Delivery” or secure online services will be used to send pupil records. For audit purposes a note of all pupil records transferred or received should be kept in either paper or electronic format. This will include the child’s name, date of birth, where and to whom the records have been sent and the date sent and/or received.
- If a pupil/student is permanently excluded and moves to a Pupil Referral Unit, Child Protection records will be forwarded on to the relevant organisation.
- Where a vulnerable young person is moving to a Further Education establishment, consideration should be given to the student’s wishes.

## **8. The Governors**

The Governing Body is the accountable body for ensuring safeguarding is efficient at JFS. The governors are both, supportive and challenging in the scrutiny of safeguarding. They will ensure that:

- JFS has a safeguarding policy and child protection policy.
- JFS operates “safer recruitment” procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers.
- At least one senior member of the school’s leadership team acts as a Designated Safeguarding Lead.
- The Designated Safeguarding Lead attends appropriate refresher training every two years.
- The Headteacher and all other staff who work with children undertake training on an annual basis.

- Temporary staff and volunteers are made aware of the school's arrangements for Child Protection and their responsibilities.
- The school remedies any deficiencies or weaknesses brought to its attention without delay.
- The school has procedures for dealing with allegations of abuse against staff/volunteers.
- The governors review its policies/procedures annually.
- The Nominated governor for Child Protection at the school are Dr Charlotte Benjamin and Susie Kaye. Governors are responsible for liaising with the Headteacher and Designated Safeguarding Leads over all matters regarding Child Protection issues. The role is strategic rather than operational – they will not be involved in concerns about individual pupils/students.
- The Safeguarding Governors will liaise with the Headteacher and the Designated Safeguarding Leads to produce an annual report for Governing Body.
- A member of the governing body is nominated to be responsible for liaising with the local authority and other partner of agencies in the event of allegations of abuse being made against the Headteacher.

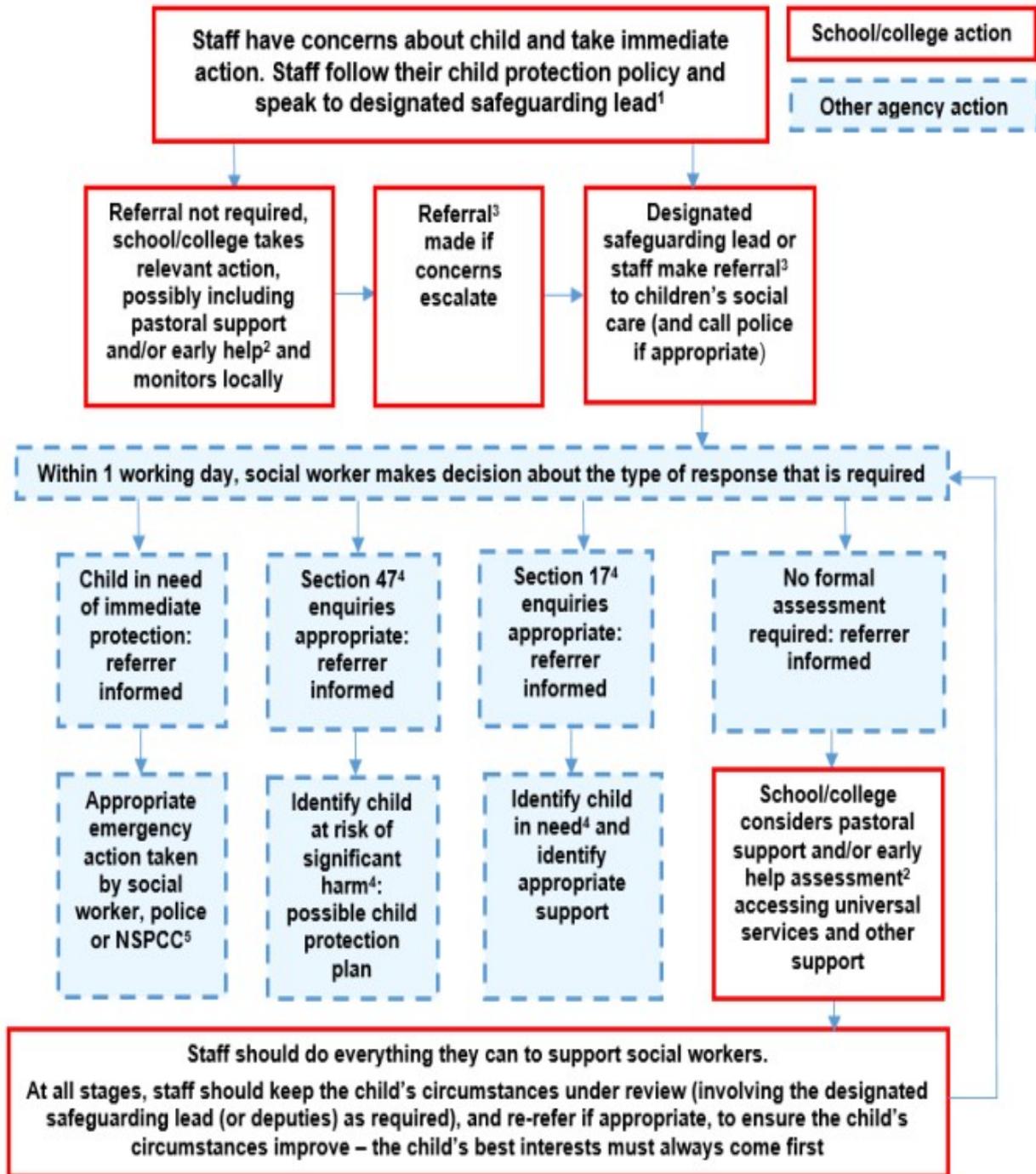
## **9. SAFER RECRUITMENT AND SELECTION**

- The school pays full regard to 'Keeping Children Safe in Education' (September 2021). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS). Headteacher and senior staff have been trained in safer recruitment.
- All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils. We recognise the stressful and traumatic nature of Child Protection work. We will support staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Leads and to seek further support as appropriate.

## **10. OUR ROLE IN PREVENTING ABUSE**

- We will provide opportunities for pupils/students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.
- Relevant issues will be addressed through the PSHCE and Jewish Studies curriculum, for example consent, peer to peer abuse, self-esteem, emotional literacy, assertiveness, power, and relationship education, e-safety and bullying.
- Relevant issues will be addressed through other areas of the curriculum, for example, English, Jewish Studies, History, Drama, Art and other aspects of the school's work, e.g. assemblies and form time.
- All our policies which address issues of power and potential harm, for example bullying, equal opportunities, handling, positive behaviour, will be linked to ensure a whole school approach.
- Our Safeguarding Policy cannot be separated from the general ethos of the school, which should ensure that pupils/students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, are listened to and are able to report concerns.

## Actions where there are concerns about a child



Abuse or Safeguarding issue	Link to Guidance/Advice
<b>Abuse</b>	<ul style="list-style-type: none"> <li>• <a href="#">What to do if you're worried a child is being abused</a> - DfE advice</li> <li>• <a href="#">Domestic abuse: Various Information/Guidance</a> - Home Office (HO)</li> <li>• <a href="#">Faith based abuse: National Action Plan</a> - DfE advice</li> <li>• <a href="#">Relationship abuse: disrespect nobody</a> - Home Office website</li> <li>• <a href="#">Tackling Child Sexual Abuse Strategy</a> - Home Office policy paper</li> <li>• <a href="#">Together we can stop child sexual abuse</a> - HM Government campaign</li> </ul>
<b>Bullying</b>	<ul style="list-style-type: none"> <li>• <a href="#">Preventing bullying including cyberbullying</a> - DfE advice</li> </ul>
<b>Children missing from education, home or care</b>	<ul style="list-style-type: none"> <li>• <a href="#">Children missing education</a> - DfE statutory guidance</li> <li>• <a href="#">Child missing from home or care</a> - DfE statutory guidance</li> <li>• <a href="#">Children and adults missing strategy</a> - Home Office strategy</li> </ul>
<b>Children with family members in prison</b>	<ul style="list-style-type: none"> <li>• <a href="#">National Information Centre on Children of Offenders</a> - Barnardo's in partnership with HM Prison and Probation Service</li> </ul>
<b>Child Exploitation</b>	<ul style="list-style-type: none"> <li>• <a href="#">Trafficking: safeguarding children</a> - DfE and HO guidance</li> <li>• <a href="#">Care of unaccompanied and trafficked children</a> – DfE statutory guidance</li> <li>• <a href="#">Modern slavery: how to identify and support victims</a> – HO statutory guidance</li> </ul>
<b>Drugs</b>	<ul style="list-style-type: none"> <li>• <a href="#">Drug strategy 2017</a> - Home Office strategy</li> <li>• <a href="#">Information and advice on drugs</a> - Talk to Frank website</li> <li>• <a href="#">Drug and Alcohol education – teacher guidance &amp; evidence review</a> – PSHE Association website</li> </ul>
<b>(so called) “Honour Based Abuse” including FGM and forced marriage</b>	<ul style="list-style-type: none"> <li>• <a href="#">Fabricated or induced illness: safeguarding children</a> - DfE, DH, HO</li> <li>• <a href="#">Rise Above: Free PSHE resources on health, wellbeing and resilience</a> - Public Health England</li> <li>• <a href="#">Medical-conditions: supporting pupils at school</a> - DfE statutory guidance</li> <li>• <a href="#">Mental health and behaviour</a> - DfE advice</li> </ul>
<b>Health and Wellbeing</b>	<ul style="list-style-type: none"> <li>• <a href="#">Fabricated or induced illness: safeguarding children</a> - DfE, DH, HO</li> <li>• <a href="#">Rise Above: Free PSHE resources on health, wellbeing and resilience</a> - Public Health England</li> <li>• <a href="#">Medical-conditions: supporting pupils at school</a> - DfE statutory guidance</li> <li>• <a href="#">Mental health and behaviour</a> - DfE advice</li> </ul>
<b>Homelessness</b>	<ul style="list-style-type: none"> <li>• <a href="#">Homelessness: How local authorities should exercise their functions</a> - Ministry of Housing, Communities &amp; Local Government guidance</li> </ul>
<b>Private fostering</b>	<ul style="list-style-type: none"> <li>• <a href="#">Private fostering: local authorities</a> - DfE statutory guidance</li> </ul>
<b>Radicalisation</b>	<ul style="list-style-type: none"> <li>• <a href="#">Prevent duty guidance</a>- Home Office guidance</li> <li>• <a href="#">Prevent duty: additional advice for schools and childcare providers</a> - DfE advice</li> <li>• <a href="#">Educate Against Hate website</a> - DfE and Home Office advice</li> <li>• <a href="#">Prevent for FE and Training</a> - Education and Training Foundation (ETF)</li> </ul>
<b>Violence</b>	<ul style="list-style-type: none"> <li>• <a href="#">Serious violence strategy</a> - Home Office Strategy</li> <li>• <a href="#">Factors linked to serious violence and how these factors can be used to identify individuals for intervention</a> – Home Office</li> <li>• <a href="#">Youth Endowment Fund</a> – Home Office</li> <li>• <a href="#">Gangs and youth violence: for schools and colleges</a> - Home Office advice</li> <li>• <a href="#">Ending violence against women and girls 2016-2020 strategy</a> - Home Office strategy</li> <li>• <a href="#">Violence against women and girls: national statement of expectations for victims</a> - Home Office guidance</li> <li>• <a href="#">Sexual violence and sexual harassment between children in schools and colleges</a>- DfE advice</li> </ul>

## NSPCC's Contact details:

- The NSPCC's what you can do to report abuse dedicated helpline is available as an alternative route for

## Resources for teaching online safety in school: ['Teaching online safety in school'](#).

Resources for teaching online	Link to Guidance/Advice
<b>Toolkits</b>	<ul style="list-style-type: none"> <li>• <a href="#">Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.</a></li> <li>• <a href="#">Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.</a></li> <li>• <a href="#">Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.</a></li> <li>• <a href="#">Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.</a></li> <li>• <a href="#">NSPCC - Harmful sexual behaviour framework</a> An evidence-informed framework for children and young people displaying HSB.</li> <li>• <a href="#">Contextual Safeguarding Network – Beyond Referrals - Schools</a> levers for addressing HSB in schools.</li> </ul>
<b>Remote education, virtual lessons and live streaming</b>	<ul style="list-style-type: none"> <li>• <a href="#">Case studies</a> on remote education practice are available for schools to learn from each other</li> <li>• <a href="#">Departmental guidance on safeguarding and remote education</a> including planning remote education strategies and teaching remotely</li> <li>• <a href="#">London Grid for Learning</a> guidance, including platform specific advice</li> <li>• <a href="#">National cyber security centre</a> guidance on choosing, configuring and deploying video conferencing</li> <li>• <a href="#">National cyber security centre</a> guidance on how to set up and use video conferencing</li> <li>• <a href="#">UK Safer Internet Centre</a> guidance on safe remote learning</li> </ul>

## 11. INVOLVING PARENTS OR CARERS

- Our preference is to discuss any Child Protection concerns with parents / carers before approaching other agencies, and will seek their consent to making a referral to another agency. Appropriate staff will approach parents / carers after consultation with the Designated Safeguarding Leads. However, there may be occasions when the school will contact another agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.
- Parents / carers will be informed about our safeguarding policy through the JFS website and parental meetings.

## 12. SAFEGUARDING PARTNERS IN BRENT – MULTI-AGENCY WORKING

- We follow locally agreed inter-agency procedures that are put in place by Brent Children's Trust Joint Commissioning Group, Barnet and Hertfordshire Local Authorities and the agreed procedures of any borough in which a JFS student who is referred, may live.

- We have a responsibility to identify concerns early, provide help for children and families and prevent concerns from escalating.
- DSL's meet regularly and undergo the appropriate level of training. DSL training is up to date.
- We work closely with our safeguarding partners. The lead representatives are able to delegate their functions to a) Director of Children and Young People LBB, b) Director of Quality, Brent CCG and c) Superintendent (Safeguarding Lead), North West BCU. And other LAs as appropriate
- We work in partnership with our safeguarding partners and other agencies in the best interests of the children.
- The Designated Safeguarding Leads/Safeguarding Team members normally make referrals. Where the child already has a safeguarding social worker, the request for service goes immediately to the social worker involved, or in their absence, to their team manager.
- We co-operate with any Child Protection enquiries conducted by children's social care: JFS ensures representation at appropriate inter-agency meetings. We provide reports as required for these meetings. If the school is unable to attend, a written report will be sent.
- Where a pupil/student is subject to a Child Protection plan or a multi-agency risk assessment conference meeting, the school contributes to the preparation, implementation and review of the plan as appropriate.

### **13. OUR ROLE IN SUPPORTING CHILDREN**

- We will offer appropriate support to individual children who have experienced abuse or who have abused others.
- An individual support plan will be devised, implemented and reviewed regularly for these children. This plan will detail areas of support, who will be involved, and the child's wishes and feelings. A written outline of the individual support plan will be kept in the child's Child Protection record.
- We will ensure that those who have suffered abuse are fully protected.
- We will ensure the school works in partnership with parents / carers and other agencies as appropriate.

### **14. CHILDREN WITH ADDITIONAL NEEDS**

While all children have a right to be safe, some children may be more vulnerable to abuse. We will pay particular attention to the vulnerability when dealing with these children.

### **15. DEALING WITH A DISCLOSURE OF ABUSE**

When a child tells me about abuse s/he has suffered, what must I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information. Use T.E.D questions i.e. tell me.... explain to me.... describe to me...
- Listen and remember - Be aware that the child may retract what s/he has told you. It is essential to record all you have heard.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty, or bad.

- It is inappropriate to make any comments about the alleged offender.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

NB: It is not education staff's role to seek disclosures. Their role is to be observe that something may be wrong, ask about it, listen, be available and try to make time to talk. Staff must not deal with this by themselves. Report this to the Designated Safeguarding Leads urgently. The Headteacher or the Designated Safeguarding Leads must report clear indications or disclosure of abuse to children's social care without delay. Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated Safeguarding Leads or Headteacher.

## **16. ALLEGATIONS AGAINST A MEMBER OF STAFF, GOVERNORS OR VISITORS:**

Please see separate policy.

## **17. CHILD PROTECTION POLICY**

Child Protection is a part of a safeguarding and promoting welfare. It relates to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. All individuals and agencies have a duty to proactively work to safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

### **17.1 AIMS**

- To create a culture whereby safeguarding has a high profile and staff are aware of their responsibilities.
- To raise the awareness of all staff, teaching, non-teaching and voluntary staff, of the need for Child Protection and of their responsibilities in identifying and reporting possible cases of abuse. ☒ To monitor school procedures and ensure all members of the school community adhere to them.
- To raise pupils' awareness of Child Protection issues.
- To help pupils to protect themselves and understand the importance of protecting others.
- To promote ways of inter-agency working and partnerships.
- To ensure that children for whom there are Child Protection concerns are effectively monitored.
- To encourage the need for effective communication between all members of the school community.

**17.2 PEER ON PEER ABUSE:** This policy reflects the whole school approach to peer on peer abuse as set out in (KCSIE 2021 para 145); The school takes the peer-to-peer abuse very seriously. We educate our students and train our staff throughout the year to make sure that there is a culture of openness and that staff are vigilant. Our 'It's not just banter' tagline means that students understand that peer on peer abuse is taken seriously and will be seriously dealt with. There are arrangements (DSL accessibility, drop boxes, email, anonymous reporting form) in place to encourage pupils to report abuse (confidentially or anonymously). These are easily understood and accessible.

We minimise the risk of peer-on-peer abuse through:

- Staff vigilance
- Staff training
- Encouraging students to report abuse by giving them mechanisms to report abuse and open access to the DSLs
- Taking appropriate actions when abuse is reported
- Our comprehensive programmes of education (PHSCE, RSE, SMSC)
- The curriculum subjects
- Engagement of a range of external organisations and providers who support us in this work.

Allegations of peer-on-peer abuse are recorded, investigated and dealt with by senior staff and DSLs. DSLs and pastoral staff will, depending on the specifics of the allegations, make arrangements to support the victims, perpetrators and any other children affected by peer on peer abuse. This may involve a range of strategies from school-based support to support from external agencies. Parents will be usually informed and involved.

We understand that even if there are no reported cases of peer-on-peer abuse – it happens here and may just not be reported. We have a zero-tolerance approach to abuse, and do not pass it off as banter. We promote the highest standards of behaviour which makes the school a safe place. We ask the students of places/areas where they may not feel safe (in and out of school) and make sure that concerns in these areas are addressed (e.g. lighting, cameras, extra supervision, etc.) There is an understanding that it is more likely that girls will be victims and boys' perpetrators, but we understand that all peer-on-peer abuse is unacceptable.

The different forms peer on peer abuse includes:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment.

Our curriculum addresses the different forms of abuse so that children understand the inappropriateness of these behaviours.

We use the UKCIS (UK Council for Internet Safety) Education Group's advice on published sharing nudes and semi-nudes which outlines how to respond to an incident of nude and semi-nude being shared. Consensual image sharing, especially between older children of the same age, may not be abusive but children are taught that it is illegal, whilst non-consensual is illegal and abusive.

We have incorporated the DfE's guidance on Searching Screening and Confiscation in our Search and Restraint Policy.

We understand the following constitute sexual violence and harassment:

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm ☒ initiation/hazing type violence and rituals.

Our reporting systems follow the guidance set out in KCSIE 2021 paragraph 83;

- Where there is a safeguarding concern we ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- We proactively encourage children to express their views and give feedback. Our surveys and interviews (which take place several times a year) are acted upon and feedback from children is valued.
- We work closely with our safeguarding partners and understand the locally agreed multi-agency safeguarding arrangements. We understand what makes a strong referral and how to contact the LADO (Mona Cook, Designated Officer, 020 8937 2057) or Brent Family Front Door (Family.FrontDoor@brent.gov.uk , 020 8937 4300).
- We know that we will be asked by Brent Family Front Door to give a brief description of the allegation and concerns raised, the location of the alleged incident, the date of the incident and the number of children involved.

**17.3 ONLINE SAFETY:** We understand that it is essential that children are safeguarded from potentially harmful and inappropriate online material. We ensure that we protect and educate pupils, students, and staff in their use of technology and have mechanisms to identify, intervene in, and escalate any concerns where appropriate.

#### **In school**

We will continue to have appropriate filtering and monitoring systems in place in school. If IT support staff are unavailable on site, we have plans in place for the systems and monitoring to remain in place by staff working remotely. Where students are using computers in school, appropriate supervision will be in place and coordinated by the member of staff in charge.

#### **Outside school**

Where staff are communicating with children online (e.g. via email or MS Teams, feeding back on work uploaded, using online learning platforms, etc.) they continue to follow our existing staff Code of Conduct and the Acceptable Use of IT Policy.

It is important that all staff who communicate with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with in line with Child Protection Policy and, where appropriate, referrals will continue to be made to children's social care and, as required, the police. We also make sure children know how to report any concerns they have back to our school, and signpost them to other sources of support too.

Online teaching and communications should follow the same principles as set out in the School's Code of Conduct. We will ensure, as far as practically possible in the given circumstances, any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

#### **Online bullying**

Cyberbullying can be extremely humiliating and damaging because of the ease with which the bully can reach a large audience. This includes:

- Using WhatsApp, texts, Instagram, Twitter, Snapchat or other social media to generate or pass on rumours about someone.
- Using social media to pass on images of someone without their consent.
- 'Sexting': This is the sending of sexually explicit digital images, videos, text messages, or email, usually via a mobile phone. It normally (but not always) involves boys putting pressure on girls to send them photographs of the girl naked or performing sexual acts, and then passing these on to their friends.
- 'Trolling' (anonymously posting abusive messages on a profile page or a Twitter account).
- Making videos on mobile phones and posting them on public sites, or sending them to others.

We enforce the procedures described in the anti-bullying policy where such activities are reported. Staff, parents and students are reminded about the need to report instances of online bullying, whether in school or out of school.

**Working with parents and carers** - We make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online.
- Know what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school.
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides.
- Know where else they can go for support to keep their children safe online.

There are 4 areas of online risk:

- **content:** being exposed to illegal, inappropriate or harmful content.
- For example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users.
- For example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images, e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group ([APWG | Unifying The Global Response To Cybercrime](#)).

We ensure that online safety is a running and interrelated theme in our policies and procedures. This includes assemblies, outside speakers, curriculum, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

Our policy is that mobiles must not be seen in school. They are confiscated if they are visible. We have safe places where pupils can hand in their valuables and collect them at the end of the day. This highly reduced access means that children, whilst at school will find it difficult to sexually harass their peers via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. We know that these risks return once pupils have left the premises and have increased supervision around the school vicinity to enable children to make their way safely home.

### **3a. Remote learning**

We follow the guidance safeguarding in schools, colleges and other providers and safeguarding and remote education for remote learning.

### **3b. Filters and monitoring**

We have invested a lot in our IT infrastructure to ensure that appropriate filters and monitoring systems in place. We follow the UK Safer Internet Centre guidance on “appropriate” filtering and monitoring. We are also aware of the risks of radicalisation and extremism and the risks an online presence exposes our students to.

### **3c. Information security and access management**

We have the appropriate level of security protection procedures in place, in order to safeguard their systems, staff and learners. With the evolving cyber-crime technologies, we have prioritised staff training and made considerable investments in protecting our systems.

Online Safety	Link to Guidance/Advice
<b>Advice for governing bodies/proprietors and senior leaders</b>	<ul style="list-style-type: none"> <li>• <a href="#">Childnet</a> provide guidance for schools on cyberbullying</li> <li>• <a href="#">Educateagainsthate</a> provides practical advice and support on protecting children from extremism and radicalisation</li> <li>• <a href="#">London Grid for Learning</a> provides advice on all aspects of a school or college’s online safety arrangements</li> <li>• <a href="#">NSPCC</a> provides advice on all aspects of a school or college’s online safety arrangements</li> <li>• <a href="#">Safer recruitment consortium</a> “guidance for safe working practice”, which may help ensure staff behaviour policies are robust and effective</li> <li>• <a href="#">Searching screening and confiscation</a> is departmental advice for schools on searching children and confiscating items such as mobile phones</li> <li>• <a href="#">South West Grid for Learning</a> provides advice on all aspects of a school or college’s online safety arrangements</li> <li>• <a href="#">Use of social media for online radicalisation</a> - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq</li> </ul>
	<ul style="list-style-type: none"> <li>• UK Council for Internet Safety have provided advice on, and an <a href="#">Online Safety Audit Tool</a> to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring</li> <li>• Department for Digital, Culture, Media &amp; Sport (DCMS) <a href="#">Online safety guidance if you own or manage an online platform</a> provides practical steps on how companies can embed safety into the design of their online platforms. It offers information on common platform features and functions (such as private messaging) and their risks, as well as steps that can be taken to manage that risk.</li> <li>• Department for Digital, Culture, Media &amp; Sport (DCMS) <a href="#">A business guide for protecting children on your online platform</a> provides guidance to businesses on how to protect children on their online platform. It outlines existing regulatory requirements and provides best practice advice on how to protect children’s personal data, ensure content is appropriate for the age of users, ensure positive user-to-user interactions and address child sexual exploitation and abuse.</li> </ul>
<b>Remote education, virtual lessons and live streaming</b>	<ul style="list-style-type: none"> <li>• <a href="#">Case studies</a> on remote education practice are available for schools to learn from each other</li> <li>• <a href="#">Departmental guidance on safeguarding and remote education</a> including planning remote education strategies and teaching remotely</li> <li>• <a href="#">London Grid for Learning</a> guidance, including platform specific advice</li> <li>• <a href="#">National cyber security centre</a> guidance on choosing, configuring and deploying video conferencing</li> <li>• <a href="#">National cyber security centre</a> guidance on how to set up and use video conferencing</li> <li>• <a href="#">UK Safer Internet Centre</a> guidance on safe remote learning</li> </ul>
<b>Support for children</b>	<ul style="list-style-type: none"> <li>• <a href="#">Childline</a> for free and confidential advice</li> <li>• <a href="#">UK Safer Internet Centre</a> to report and remove harmful online content</li> <li>• <a href="#">CEOP</a> for advice on making a report about online abuse</li> </ul>

Online Safety	Link to Guidance/Advice
Parental support	<ul style="list-style-type: none"> <li>• <a href="#">Childnet</a> offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support</li> <li>• <a href="#">Commonsensemedia</a> provide independent reviews, age ratings, &amp; other information about all types of media for children and their parents</li> <li>• <a href="#">Government advice</a> about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying</li> <li>• <a href="#">Government advice</a> about security and privacy settings, blocking unsuitable content, and parental controls</li> <li>• <a href="#">Internet Matters</a> provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world</li> <li>• <a href="#">Let's Talk About It</a> provides advice for parents and carers to keep children safe from online radicalisation</li> <li>• <a href="#">London Grid for Learning</a> provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online</li> <li>• <a href="#">Stopitnow</a> resource from <a href="#">The Lucy Faithfull Foundation</a> can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)</li> <li>• <a href="#">National Crime Agency/CEOP Thinkuknow</a> provides support for parents and carers to keep their children safe online</li> <li>• <a href="#">Net-aware</a> provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games</li> <li>• <a href="#">Parentzone</a> provides help for parents and carers on how to keep their children safe online</li> <li>• <a href="#">Parent info</a> from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations</li> <li>• <a href="#">UK Safer Internet Centre</a> provide tips, advice, guides and other resources to help keep children safe online</li> </ul>

**17.4 SEND PUPILS:** We recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. We recognise the additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges.

**17.5 COUNTY LINES:** We recognise that we work in an area where drug crime is prevalent. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line".

This activity can happen locally as well as across the UK - no specified distance of travel is required.

Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

**17.6 MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.

**17.7 ROLE OF THE DESIGNATED SAFEGUARDING LEADS:** Senior member of staff from the school or leadership team are the Designated Safeguarding Leads. The Designated Safeguarding Leads take lead responsibility for safeguarding and child protection (including online safety). The Designated Safeguarding Leads are Cristalina Fernandes, Paul Ramsey, Gita Patel and Lelanie Grobler

The role of the Designated Safeguarding Leads carries a significant level of responsibility, and they have the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

### **Manage referrals**

The Designated Safeguarding Lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

## Working with others

The Designated Safeguarding Lead is expected to:

- act as a source of support, advice and expertise for all staff.
- act as a point of contact with the safeguarding partners.
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member.
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs co-ordinators (SENCOs), or the named person with oversight for SEN and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically.
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school. This includes:
  - ensure that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
  - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

## Availability

During term time, the Designated Safeguarding Lead (or a deputy) will be available (during school hours) for staff in the school to discuss any safeguarding concerns.

### **17.7 ROLE OF THE HEADTEACHER:** The Headteacher is ultimately responsible within JFS for Child Protection.

The Headteacher is responsible for:

- Supporting the Designated Safeguarding Leads.
- Ensuring internal and external arrangements for consultation and liaison are devised.
- Keeping themselves informed of all Child Protection situations or matters.
- Considering Child Protection input to the curriculum.
- Considering in conjunction with the Designated Safeguarding Leads at what point to involve parents and or those with parental responsibility.
- Ensuring an effective recording system is in place.
- Ensuring arrangements are in place for police checks of voluntary helpers (see Role of the Designated Safeguarding Leads).
- Ensuring that JFS has a Child Protection Policy consistent with legislation.
- Ensuring information about a child or young person whose name is on the register is passed on to a new school.
- Taking the lead where allegations are made against a member of staff.

**17.9 ROLE OF THE NOMINATED GOVERNOR:** This governor will be responsible for:

- Liaising with the Headteacher/Designated Safeguarding Lead at JFS over issues regarding Child Protection matters.
- Ensuring, in liaison with the Headteacher/Designated Safeguarding Lead that JFS has a Child Protection Policy and procedures in place which are consistent with the latest requirements.
- Ensuring that an annual item is placed on the Trustees' agenda to report on changes to Child Protection Policy/procedures, training undertaken by the Designated Safeguarding Leads, other staff and Trustees, the number of incidents or cases (without details or names) and the place of Child Protection matters in the school's curriculum.
- Following the procedures relating to liaison with the Department for Education, Social Services Department and the police in relation to any allegations of child abuse made against the Headteacher, including attendance at Strategy Meetings.
- Ensuring good communication between all parties. ☑ Attending training for nominated Trustees.

**17.10 MONITORING AND SUPPORTING CHILDREN ON THE CHILD PROTECTION REGISTER:** The

Designated Safeguarding Leads monitor pupils whose names are on a Child Protection Plan in line with what has been agreed with Social Care. The Designated Safeguarding Leads liaise with staff, where appropriate, to ensure that the children's needs are met within the school, and to help these children regain their self-esteem and, where necessary, modify their behaviour.

**17.11 RECORDING CHILD PROTECTION CONCERNS:** The Designated Safeguarding Leads create a Child Protection file for the child immediately any Child Protection concerns are expressed to ensure that there are clear records in case a referral to Social Care is necessary. This file is kept separate from the child's educational files, in a secure electronic folder.

**17.12 CHILD PROTECTION RECORDS:** The Child Protection Record is filled in as far as possible and kept up to date if there are changes in the child's circumstances. Any rough notes made at the time of the incident are scanned and retained as a part of the Child Protection file. CPOMS also contains any reports and records of telephone conversations, home visits and formal communications with Children's Social Care and other agencies. All records will be kept in line with current legislation.

**17.13 STORAGE OF FILES**

- All legacy Child Protection files (in paper form) are stored in a locked filing cabinet in the office of the Designated Safeguarding Lead, which is kept locked when unoccupied.
- The designated safeguarding lead is responsible for ensuring that electronic child protection files are kept up to date. Information is kept confidential and stored securely. Each child has their own child protection file. Records give a comprehensive summary of the concern and details of how the concern was followed up and resolved. There are notes of any action taken, decisions reached and the outcome.
- The file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of the KCSIE 2021 guidance.
- Where children leave the school (including in year transfers) the designated safeguarding lead ensures that their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This is transferred separately from the main pupil file, and ensuring secure transit, a confirmation of receipt is obtained.
- We recognise that the lack of information about the child's circumstances can impact on their safety, welfare and educational outcomes.
- The designated safeguarding lead also considers if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.
- Please note that as required we hold more than one emergency contact number for each pupil or student.

**17.14 MAKING A REFERRAL:** Initial referrals to Social Care are made by telephone and followed by a written report, containing the relevant information about the case. For CP, the following information is required: description of the allegation and concerns raised, the location of the alleged incident, the date of the incident and the number of children involved.

**17.15 STAFF TRAINING – LA PARTNERSHIP PRIORITIES (Latest Report is Dated 2019/20) ARE:**

- I. Reducing domestic violence and sexual abuse against women and girls
- II. Reducing the impact of gangs and knives in our community
- III. Reducing anti-social behaviour
- IV. Reducing offenders and perpetrators from reoffending
- V. Reducing vulnerability and increasing safeguarding
- VI. Preventing radicalisation
- VII. Child sexual exploitation

**17.16 POLICY REVIEW:** This policy is reviewed annually and updated, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. This policy is a part of the safeguarding policy and is available on the school website.

**18 EVALUATING OUR SAFEGUARDING PROCESSES**

- **At JFS we believe safeguarding arrangements are as effective as they can be because:**
- We promote an ‘open’ culture. There is zero tolerance of abuse (including, peer on peer abuse). Children say they feel safe and are listened to.
- Leaders have put in place effective safeguarding strategies and behaviour policies. Staff are frequently reminded of these and are clear about the procedures to follow.
- Adults are vigilant, have a strong, robust and proactive response that reduces the risk of harm or actual harm. Adults take the appropriate and necessary action.
- The Designated Safeguarding Leads play an effective role in pursuing concerns and protecting children and learners.
- Learners can identify a trusted adult. They report that adults listen to them and take their concerns seriously.
- Written records are made promptly and logged on CPOMS. These are stored appropriately and, where necessary, shared with consent.
- Any CP or safeguarding concerns about any professional working in JFS are shared immediately with the LADO.
- There are written child protection plans in place. The plans identify the help the child receives and actions if there are any further concerns.
- Children who are missing – local procedures for notifying the LA and parents are available, understood and followed.
- Risks associated with learners offering or using drugs or alcohol, self-harm, going missing, vulnerability to radicalisation or sexual exploitation are known by the Designated Safeguarding Leads in WHTC and shared with our safeguarding partners. These risks are reviewed and there is effective liaison with other agencies.
- Learners are protected and helped to keep themselves safe from bullying, homophobic behaviour, racism, sexism and other forms of discrimination. Children understand how to treat others with respect.
- Children are aware of where to go for support and some of the support available to them.
- Adults understand the risks posed by adults to learners via technology. These include using the internet to bully, sexually abuse or harass, radicalise or groom children. Leaders oversee the safe use of technology when learners are in their care and take immediate action if they are concerned about learners’ well-being.
- Procedures with regard to the safe use of mobile phones and cameras are implemented.

- Leaders respond consistently to protect learners whilst enabling them to take age appropriate and reasonable risks as a part of their growth and development.
- Staff respond with clear boundaries about what is safe and acceptable and seek to understand the triggers for learners' behaviour.
- Positive behaviour is promoted consistently. De-escalation strategies that are appropriate to the learners are deployed.
- Reasonable force, including restraint are only used to protect the learners and those around them (see 'Search and Restraint Policy').
- Staff and volunteers are carefully selected and vetted. Monitoring is in place to prevent unsuitable people from being recruited.
- There are clear and effective staff development and training arrangements in place.
- The physical environment is safe, welcoming and stimulating and children are able to enjoy learning and grow in confidence.
- Staff have written procedures for reporting harm to a child. They know how to whistleblow or make a report so as to manage concerns about other adults in respect of safety and protection of children and learners.
- There are well developed strategies around online usage to keep learners safe and support them in learning how to keep themselves safe.
- Arrangements are in place regarding H&S (water, fire, roads and railways) and the setting is a safe environment with secure access.
- SCR is complete and meets statutory requirements.
- Visitors are checked and monitored. Visitors are vetted (external speakers at assemblies, etc.) We are aware of the dangers posed by speakers with regards to terrorism and radicalisation.
- Safeguarding Policy and Child Protection Policy are implemented and kept under review.
- JFS is proactive about anticipating and managing risks that children and learners face in the wider community.
- We work closely with external agencies and challenge them as necessary.

**19** **EVALUATION OF SAFEGUARDING** has been carried out annually by a safeguarding audit which is adapted from the Section 11 Safeguarding Audits. In 2020-21, we will be using the Safeguarding Children in Education: Annual Self-audit tool 2021-22 to evaluate safeguarding. This evaluation will be scrutinised by the governors at the BAPD Meetings.

**Frequent feedback is collected from staff (e.g., via surveys, quizzes, meetings, and** action is taken to inform and update staff on a weekly basis via the school bulletin. Further updates and training is provided as necessary.

**20** **LINKS TO OTHER POLICIES TO VIEW** [CLICK HERE](#)

- *Supporting Pupils at School with Medical Conditions*
- *Anti-Bullying*
- *Attendance Policy*
- *Children Missing in Education Policy*
- *Child Protection - Guidance for Staff*
- *Citizenship & PSHE*
- *Code of Conduct (Student Behaviour)*
- *Complaints Procedure*
- *Drugs Policy*
- *First Aid Policy*

- *Health & Safety Policy (consists of Arrangements for Visitors to School, Code of Conduct, Trips Policy, Fire Safety Emergency Evacuation Procedures, First Aid Policy, Lettings Policy and Form, Supporting Pupils at School with Medical Conditions, Risk Assessments for various faculties, Staff Training & Development Programme)*
- *Keeping Children Safe in Education 2021*
- *Behaviour*
- *Pastoral Support Plans and Intervention Room*
- *Preventing Radicalisation and Extremism*
- *Promotion of British Values*
- *Reflection, Peer-counselling and Prayer Space Policy*
- *Safer Recruitment – KCSIE 2021*
- *Search and Restraint Policy*
- *Relationships and Sex Education (RSE)*
- *Social Networking Policy*
- *Visits Policy*

## **SECTION B**

### **SAFEGUARDING STANDARDS REQUIRED OF STAFF**

#### **Overview**

The vast majority of adults who work with children in education settings act professionally. They seek to provide a safe and supportive environment, which secures the well-being and very best outcomes for children and young people in their care. Much relies on pupil and staff interactions where tensions and misunderstandings can occur. It is here that staff behaviours can give rise to allegations being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

This document seeks to ensure that the duty of care towards pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour. It is explicitly stated so that it will assist staff to monitor their own standards and practice.

Through this guidance trustees as employers give a clear message that unlawful or unsafe behaviour will not be tolerated and where appropriate, legal or disciplinary action is likely to follow.

Whilst every attempt has been made to cover a wide range of situations, it is recognised that any such guidance cannot cover all eventualities.

#### **Underpinning Principles**

- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work, in an open and transparent way.
- Staff should discuss and/or take advice promptly from their line manager or another senior member of staff over any incident, which may give rise to concern.
- Records should be made of any such incident and of decisions made/further actions agreed, in accordance with school policy for keeping and maintaining records.
- Staff should apply the same professional standards regardless of gender, ethnicity or sexuality.
- All staff should know the name of their Designated Safeguarding Leads be familiar with local Child Protection arrangements and understand their responsibilities to safeguard and protect children and young people.
- Staff should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

## Safe Working Practices Required:

### 1. Introduction

Staff have a crucial role to play in shaping the lives of young people. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help staff establish the safest possible learning and working environments.

*This means that these guidelines:*

- *apply to all adults working in education settings whatever their position, roles, or responsibilities.*

### 2. Duty of Care

Teachers and other education staff are accountable for the way in which they exercise authority, manage risk, use resources and protect pupils from discrimination and avoidable harm.

All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from physical and emotional harm. This duty is in part exercised through the development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.

Governors, staff and parents have legitimate expectations about the nature of professional involvement in the lives of pupils. When individuals accept a role that involves working with children and young people, they need to understand and acknowledge the responsibilities and trust inherent in that role.

*This means that adults should:*

- *always act, and be seen to act, in the child's best interests*  
*understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached*
- *avoid any conduct which would lead any reasonable person to question their motivation and intentions*
- *take responsibility for their own actions and behaviour*
- *report any incident to the relevant person within school in a timely fashion using appropriate systems*

### 3. Exercise of Professional Judgement

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight however, behaviour that is illegal, inappropriate or inadvisable. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge and in so doing, will be seen to be acting reasonably.

*This means that where no specific guidance exists staff should:*

- *avoid any actions, words or behaviours that are 'illegal, inappropriate or inadvisable'*
- *discuss the circumstances that informed their action, or their proposed action, with a senior colleague*
- *be prepared to seek advice prior to any proposed action if problems are anticipated*
- *always discuss any misunderstanding, accidents or threats with a senior manager*
- *always record discussions and actions taken with their justifications*
  - *log any concerns and copy these to the Headteacher, the relevant line manager and the member of staff responsible for safeguarding.*

#### 4. Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour, which might be misinterpreted by others, and report and record any incident with this potential.

*This means that adults should not:*

- *use their position to gain access to information for their own advantage and/or a child's or family's detriment*
- *use their power to collude with, intimidate, threaten, coerce or undermine pupils*
- *use their status and standing to form or promote relationships with children, which are of a sexual nature and would be considered grooming*
- *all adults should be aware of acceptable ways in which a child can be disciplined and of the difference between discipline and bullying.*

#### 5. Confidentiality

Members of staff may have access to confidential information about pupils in order to undertake their everyday responsibilities. In some circumstances staff may be given additional highly sensitive or private information. Information must never be used to intimidate, humiliate, or embarrass the pupil.

Confidential information about a child or young person should never be used casually in conversation (e.g. in the corridor during break or lunchtime or in staff workrooms) or shared with any person other than on a need to know basis. In circumstances where the child's identity does not need to be disclosed the information should be used anonymously.

There are some circumstances in which a member of staff may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to the Designated Safeguarding Leads.

Confidential information should not be displayed where others can see it.

Gossip spreading within school is not acceptable and, where necessary, situations will be clarified publicly by a senior member of staff.

Any media or legal enquiries should be passed to a member of the senior leadership. Staff should not comment if contacted by any media, including social networks.

The storing and processing of personal information about pupils is governed by the Data Protection Act 1998. All staff must treat all pupil or staff information as confidential.

*This means that staff:*

- *are expected to treat information they receive about children and young people in a discreet and confidential manner*
- *in any doubt about sharing information they hold or which has been requested of them should seek advice from a senior member of staff*
- *need to be cautious when passing information to others about a child/young person*
- *should record information in an objective and sensitive way and be prepared to defend anything they have written.*

## 6. Propriety and Behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people.

They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and the public in general.

An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting.

Teachers must appreciate the importance of their own professional status in society. They should recognise that professionalism involves using judgement over appropriate standards of personal behaviour.

*This means that adults should not:*

- *behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model*
- *make sexual remarks to a pupil (including email, text messages, Teams messages, phone or letter)*
- *discuss their own sexual relationships with, or in the presence of, pupils*
- *discuss a pupil's sexual relationships in inappropriate settings or contexts*
- *make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such.*

## 7. Dress and Appearance

Staff should consider the manner of dress and appearance appropriate to their professional role which may be different from that adopted in their personal life.

Staff should ensure they are dressed professionally. Staff who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or misconduct. The Headteacher can legitimately request that individual members of staff alter their dress or appearance if it is casual or not in line with the high standards of professionalism expected in the school.

*This means that adults should wear clothing which:*

- *promotes a positive, formal and professional image*
- *is appropriate to their role*
- *is not likely to be viewed as offensive, revealing, or sexually provocative*
- *does not distract, cause embarrassment or give rise to misunderstanding*
- *is absent of any political or otherwise contentious slogans (this applies to property that staff may have as well, e.g. cups)*
- *is not considered to be discriminatory.*

The list above is provided as guidance and is not meant to be exhaustive. Staff should seek guidance from their Line Manager if they have any queries. The Headteacher will be the final arbiter on what is deemed appropriate.

## 8. Gifts

It is against the law for public servants to take bribes. Staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

There are occasions when children or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts of any significant value (the total value should not exceed £50).

Similarly, it is inadvisable to give such personal gifts to pupils. This could be misinterpreted as a gesture either to bribe, or single out the young person. It might be perceived that a 'favour' of some kind is expected in return.

Any reward given to a young person should be agreed practice within the establishment, consistent with the school's behaviour policy, recorded and not based on favouritism.

*This means that adults should:*

- *ensure that gifts received or given in situations which may be misconstrued are declared*
- *generally, only give gifts to an individual young person as part of an agreed reward system*
- *where giving gifts other than as above, ensure that these are of insignificant value and given to all children equally.*

## 9. Infatuations

Staff need to be aware that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop a heterosexual or homosexual infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff.

A member of staff, who becomes aware that a pupil may be infatuated with themselves or a colleague, should discuss this immediately with a senior colleague so that appropriate action can be taken. In this way, steps can be taken to avoid hurt and distress for all concerned.

*This means that adults should:*

- *report immediately any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff.*

## 10. Social Contact

Staff must not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. This includes having contact with pupils via social media such as Facebook, Twitter, Instagram, MS Teams, mobile phones and email. Staff must ensure that their privacy settings and account settings for these sites are on maximum, so that pupils cannot access their details. Please see Social Networking Policy for further details.

Staff should not give their personal details such as home/mobile phone number, home or e-mail address to pupils unless the need to do so is agreed with senior management. Where appropriate, staff will be given the use of school-owned mobile phones.

The school e-mail and MS Teams platform should be the only methods used for communication with students regarding school work in accordance with school policy.

*This means that adults should:*

- *always approve any planned social contact with senior colleagues, for example when it is part of a reward scheme or pastoral care programme*
- *report and record any social contact or attempted social contact, which might compromise the school or their own professional standing.*

## 11. Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible in the school's incident book and, if appropriate, a copy placed on the child's file.

*This means that adults should:*

- *be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described*
- *never touch a child in a way which may be considered indecent*
- *always be prepared to explain actions and accept that all physical contact be open to scrutiny* • *never indulge in horseplay, tickling or fun fights*
- *never touch a child in affection or anger.*

## 12. Physical Education and other activities which require physical contact.

Some staff, for example, those who teach PE and games, or who offer music tuition, will on occasion have to initiate physical contact with pupils in order to support a child so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

*This means that adults should:*

- *consider alternatives, where it is anticipated that a pupil might misinterpret any such contact, perhaps involving another member of staff, or a less vulnerable pupil in the demonstration*
- *always explain to a pupil the reason why contact is necessary and what form that contact will take.*

### 13. Showers and Changing

Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

Staff therefore, need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the pupils.

Specific ethnic or religious issues may need to be taken into account when deciding on appropriate behaviour with individual students.

*This means that adults should:*

- *avoid any physical contact when children are in a state of undress*
- *avoid any visually intrusive behaviour*

*Where there are shower areas:*

- *announce their intention of entering*
- *avoid remaining in the room unless pupil needs require it.*

*This means that adults should not:*

- *change in the same place as children*
- *be in a state of undress where children see them*

*shower with children.*

### 14. Pupils in Distress

There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

In cases where a child is upset as a result of bullying (including online bullying and phone bullying), staff should follow the schools' Bullying Referral System.

Where a member of staff has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from a senior manager.

*This means that adults should:*

- *consider the way in which they offer comfort to a distressed pupil*
- *always tell a colleague when and how they offered comfort to a distressed child*
- *record situations which may give rise to concern and follow school's procedures*
- *not be alone with a student and avoid physical contact with students.*

### 15. Behaviour Management

Everyone has a right to be treated with respect and dignity. Corporal punishment is unlawful in all schools. Equally, staff should not use any form of degrading treatment to punish a pupil. The use of humour can help to defuse a situation. The use of demeaning or insensitive comments towards pupils is not acceptable.

*This means that adults should:*

- *not use force as a form of punishment*
- *try to defuse situations before they escalate*
- *keep parents informed of any sanctions by logging incidents on SIMS*
- *adhere to the school's Behaviour Management Policy.*

## 16. Sexual Contact and Sexual Harassment of Young People

Any sexual behaviour by a member of staff with or towards a child or young person is both unacceptable and illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person consents or not.

The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material as well as taking and sending nudes. 'Working Together to Safeguard Children' defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening".

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child, and manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring special attention and favour upon a child might be construed as being part of a 'grooming' process, which is an offence.

Sexual abuse can take place online and technology can be used to facilitate offline abuse. Staff should ensure that all interactions with pupils on MS Teams and other learning platforms are kept professional and not used to confer special attention or favour upon a child which may also be construed as being part of a 'grooming process'.

## 17. One to One Situations

Staff working in one to one situations with children and young people may be more vulnerable to allegations. Teachers and others should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of pupils are met.

Staff should endeavour to follow these procedures at all times including during informal meetings at break time and instances after school when pupils may be waiting to be collected to go home or have missed their bus.

Pre-arranged meetings with pupils away from the school premises should not be permitted unless approval is obtained from their parent and the Headteacher or other senior colleague with delegated authority.

*This means that adults should:*

- *avoid meetings with pupils in remote, secluded areas of school (e.g. music practice rooms, offices which are not in view of others)*
- *ensure there is visual access and/or an open door in one to one situations*
- *inform other staff of the meeting beforehand, assessing the need to have them present or close by*
- *avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy*
- *always report any situation where a child becomes distressed or angry to a senior colleague*
- *consider the needs and circumstances of the child/children involved.*

## 18. Transporting Children

In certain situations, e.g. out of school activities, staff or volunteers rarely may agree to transport children. This should only take place if the senior line manager has been informed and if the member of staff involved has the correct level of insurance. Parental permission must be given before any member of staff transports a pupil in a private vehicle. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort.

Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded.

*This means that adults should:*

- *plan and agree arrangements with all parties in advance, responding sensitively and flexibly to disagreements*
- *ensure that they are alone with a child for the minimum time possible*
- *be aware that the safety and welfare of the child is their responsibility until this is safely passed over to a parent/carer*
- *report the nature of the journey, the route and expected time of arrival to the general office in accordance with agreed procedures*
- *ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety.*

## 19. Educational Visits and After School Clubs, etc.

Staff should take particular care when supervising pupils in the less formal atmosphere of a residential setting or after-school activity.

During school activities that take place off the school site or out of school hours, a suitable level of discipline must be maintained with staff remaining in a position of trust. Staff need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or a relaxation of the normal expectations.

Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, staff and parents should be informed of these prior to the start of the trip. All arrangements should be made in accordance with the school's trips and visits policy.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity. Staff must be aware of and follow guidance of the school's policy on trips and visits.

*This means that adults should:*

- *always have another adult present in out of school activities, unless otherwise agreed with senior staff in school*
- *undertake risk assessments*
- *have parental consent to the activity*
- *ensure that their behaviour remains professional at all times*

*This means that adults should:*

- *adhere to the school's First Aid Policy*
- *make other staff aware of the task being undertaken*
- *explain to the child what is happening*

## 20. Curriculum

Some areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.

There may also be areas of the curriculum which could lead to pupils expressing views which are extremist or promoting religious conflict, or offensive to others (e.g. racist, sexist, homophobic). It is the duty of all teachers to challenge all contentious or unacceptable language, views and actions by pupils, making it clear that this is not acceptable in the school and log this on CPOMS.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and staff may wish to take guidance in these circumstances from a senior member of staff or the DSLs

Care should also be taken to abide by the Policy on Sex and Relationships Education and the wishes of parents.

Staff should introduce lessons of a sensitive nature with clear guidelines about the parameters within which questions may be asked

*This means that adults should:*

- *have clear written lesson plans.*
- *where possible forewarn students of lesson/assemblies of a sensitive nature.*

*This means that adults should not:*

- *enter into or encourage inappropriate or offensive discussion about sexual activity.*

## 21. Photography, Videos and other Creative Arts

Many school activities involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement.

Staff need to be aware of the potential for these aspects of teaching to be misused. Using images of children for publicity purposes will require the consent of the individual concerned and their legal guardians. Ordinarily parents sign an authorisation as part of the admission process consenting to the use of photographic images.

Images should not be displayed on websites, in publications or in a public place without the consent of a senior manager.

*This means that adults should:*

- *be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded*
- *ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose*
- *ensure that all images are available for scrutiny in order to screen for acceptability*
- *be able to justify images of children in their possession*
- *avoid making images in one to one situations*
- *check with the office to ensure that permission has been given for the use of photographic images.*

*This means that adults should not:*

- *take, display or distribute images of children or staff unless they have consent to do so from their Line Manager.*
-

## 22. Internet Use

Please follow the school's Data Protection, E-Safety and Acceptable Use policies.

## 23. Informality

Staff have a duty to act at all times as responsible adults. Staff should not speak or act informally with the students. Informality can be considered by the students as a basis for a special relationship. It also means that the member of staff is opening themselves up to allegations of inappropriate conduct by the pupil or his/her parents.

*This means that staff should:*

- *Act formally*
- *Follow the formal school's expectations*

## 24. Reporting Concerns About Other Members of Staff

Staff have a duty to report any safeguarding concerns/allegations they have about another member staff including supply staff, volunteers and contractors to the DSLs, who will then report these to the Headteacher.

Where staff have a safeguarding concern/allegation about the Headteacher or designated safeguarding lead then this should be reported to the chair of governors.

Where there may be a conflict of interest in reporting to the Headteacher, staff should report directly to the Brent LADO (Mona Cook, Designated Officer, 020 8937 2057).

*This means staff should:*

- *watch out for signs that would indicate a member of staff is forming an inappropriate relationship with a pupil e.g.:*
  - *being overly friendly with pupils,*
  - *having favourites,*
  - *taking photographs of children on their mobile phone,*
  - *engaging with a child on a one to one basis in a secluded area or behind closed doors,*
  - *using inappropriate sexualised, intimidating or offensive language*
  - *using MS Teams inappropriately with students to have personal conversations*

## 25. Peer on Peer Abuse (including Sexual Violence and Sexual Harassment)

Staff have a duty to be aware that children can abuse other children and that this can happen in and out of school and online. Staff have an important role in preventing peer on peer abuse and responding where they believe a child may be at risk.

This means staff should

- Know there is a zero tolerance approach to peer on peer abuse
- Be vigilant and look for signs of peer on peer abuse
- Act immediately if they witness abuse in or out of school e.g. hearing racist/homophobic or sexist comments or seeing physical abuse, by following the school behaviour policy
- Listen calmly and openly if a child discloses peer on peer sexual abuse or harassment
- Report all incidents of peer on peer abuse to DSLs

Failure to act on peer on peer abuse or downplaying certain behaviours as "just banter" or "it's part of growing up" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in the worst case, a culture where abuse is normalised, leading to children accepting abuse and not reporting it.

To prevent a culture of peer on peer abuse, staff should consider their own behaviours.

*This means staff should:*

- *Always act professionally*
- *Role model the behaviours expected of pupils when interacting with them and other members of staff*
- *Never use racist/homophobic or derogatory language*
- *Be seen to act on peer on peer abuse by using the school behaviour policy in every instance*

## **26. Radicalisation and Extremism**

Staff have a duty to report any concerns that they may have if they believe a pupil is being radicalised. Further details can be found in the Safeguarding Policy.

*This means that staff should:*

- *Watch out for signs of extremism and radicalisation*
- *Report concerns*
- *Challenge extremist views if expressed in lessons or out of lessons.*

## THE PREVENT DUTY

In order for schools and childcare providers to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of schools' and childcare providers' wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Schools can build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. "Extremism" is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also included in the definition of extremism are calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations. **It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues.** On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments. The duty covers 4 areas:

### 1. Risk Assessment Statement

The statutory guidance makes clear that schools and childcare providers are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

The general risks affecting children and young people may vary from area to area, and according to their age. Schools are in an important position to identify risks within a given local context. It is important that schools understand these risks so that they can respond in an appropriate and proportionate way. At the same time schools should be aware of the increased risk of online radicalisation, as terrorist organisations such as ISIL seek to radicalise young people through the use of social media and the internet.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. The Prevent duty does not require teachers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. General safeguarding principles apply to keeping children safe from the risk of radicalisation as set out in the relevant statutory guidance, [Working together to safeguard children](#) and [Keeping children safe in education](#).

**School staff should understand when it is appropriate to make a referral. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.** It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

An online general awareness training module on Channel is available, please visit: [Welcome \(prevent.homeoffice.gov.uk\)](https://www.prevent.homeoffice.gov.uk)

## **2. Working in partnership**

The Prevent duty builds on existing local partnership arrangements. For example, LSCBs publish threshold guidance indicating when a child or young person might be referred for support. **In Brent, Kibibi Octave is our local Prevent Officer.**

Effective engagement with parents / the family is important as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms.

## **3. Staff training**

The statutory guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. The Home Office has developed a core training product for this purpose – Workshop to Raise Awareness of Prevent (WRAP).

As a minimum, however, schools should ensure that the Designated Safeguarding Lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. All staff have completed PREVENT Training in 2020 – 21 and this is updated annually for all staff.

## **4. IT policies**

The statutory guidance makes clear the need for schools to ensure that children are safe from terrorist and extremist material when accessing the internet in schools. We have suitable and stringent filtering in place  
More generally, schools have an important role to play in equipping children and young people to stay safe online, both in school and outside. Internet safety will usually be integral to a school's ICT curriculum and can also be embedded in PSHE and the assembly programme.

As with other online risks of harm, every teacher needs to be aware of the risks posed by the online activity of extremist and terrorist groups.

## **5. Building children's resilience to radicalisation**

Schools can build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. Schools are already expected to promote the spiritual, moral, social and cultural development of pupils and, within this, fundamental British values.

## 6. What to do if you have a concern

As explained above, if a member of staff in a school has a concern about a particular pupil they should follow the school's normal safeguarding procedures, including discussing with the school's Designated Safeguarding Leads.

Alternatively, for others, you can make a referral through Brent Family Front Door (020 8937 3400), by email to [familydoor@Brent.gov.uk](mailto:familydoor@Brent.gov.uk) or [prevent@Brent.gov.uk](mailto:prevent@Brent.gov.uk) or you can contact the Brent Strategic Prevent Manager (Kibibi Octave) on 020 8937 4225.

You can also contact your local police force or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice.

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk). Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.