



**JFS School**  
The Mall Kenton Harrow Middlesex HA3 9TE

**JFS SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURES**

*Reviewed in the Summer Term 2017*  
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## 1. POLICY STATEMENT AND PRINCIPLES

### Values and Ethos

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

Vayikra 19:18

וְאָהַבְתָּ לְרֵעֶךָ כָּמוֹךָ

Love your neighbour as yourself

Devarim 4:9

הִשָּׁמֵר לְךָ וּשְׁמֵר נַפְשְׁךָ מְאֹד

Take very good care of your physical and spiritual self,

Devarim 4:15

וְנִשְׁמַרְתֶּם מְאֹד, לְנַפְשֵׁיכֶם

You should look after yourself properly

are the foundation of all issues at JFS related to safeguarding. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where students are respected and valued. We will act quickly and follow our procedures to ensure students receive effective support, protection, and justice.

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

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

We will provide opportunities across the curriculum which equips students with the skills they need to keep safe from harm.

### Our core safeguarding principles are:

- the School's responsibility to safeguard and promote the welfare of children is of paramount importance;
- safeguarding and promoting the welfare of children is everyone's responsibility. In order to fulfil this responsibility effectively, all teachers at JFS will make sure their approach is child centred. This means that teachers at JFS will consider, at all times, what is in the best interests of the child;
- the School recognises that if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action;
- safer children make more successful learners;
- representatives of the School community will be involved in policy development and review;
- policies will be reviewed annually unless an incident or new legislation or guidance suggests the need for an interim review;
- The School will work with other agencies and share information appropriately to ensure the safety and wellbeing of our students.

- Where there is a safeguarding concern the School will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems will be in place for children to express their views and give feedback. All systems and processes should operate with the best interest of the child at their heart.

### **Child Protection Statement**

#### **JFS' Child Protection principles are:**

- Welfare of the child is paramount;
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection;
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- There is a culture of transparency, openness and, if needed, challenge with regards to maintaining high standards in safeguarding;
- Students and staff involved in child protection issues will receive appropriate support.

#### **Policy aims:**

- To provide all staff with the necessary information to enable them to meet their safeguarding responsibilities;
- To ensure consistent good practice;
- To demonstrate the School's commitment with regard to safeguarding to students, parents and other partners;
- To contribute to the School's safeguarding portfolio

## 2. SAFEGUARDING LEGISLATION AND GUIDANCE

Statutory Guidance:

### **Education Act 2002**

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

### **Counter Terrorism and Security Act 2015**

Section 26 Applies to schools and other providers, who have to pay due regard to the need to prevent people being drawn into terrorism.

### **Working Together to Safeguarding Children (2015)**

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

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

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

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

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

### **Prevent Duty Guidance – England and Wales**

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

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

### **Serious Crime Act 2015**

Relating to the mandatory reporting of FGM

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

### **Teaching Standards**

The Teacher Standards 2012 state that teachers, including head teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Non-Statutory Guidance:

### **Sexting in Schools and Colleges UKCCIS August 2016**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/551575/6.2439\\_KG\\_NCA\\_Sexting\\_in\\_Schools\\_WEB\\_1\\_.PDF](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB_1_.PDF)

### 3. ROLES AND RESPONSIBILITIES

#### **Key personnel:**

#### **The Designated Safeguarding Lead (DSL) for child protection (member of Senior Leadership) is:**

Miss T Thoret (Deputy Headteacher)

Contact details: email: admin@jfs.brent.sch.uk Tel: 8206 3100

#### **The Deputy DSL is Mr R Bruce (Director of Studies)**

Contact details: email: admin@jfs.brent.sch.uk Tel: 020 8206 3100

#### **The nominated child protection governor is: Mrs C Benjamin and Mr A Moss**

Contact details: email: admin@jfs.brent.sch.uk Tel: 020 8206 3100

#### **The Headteacher is: Mrs D Lipkin (Executive Headteacher) / Mr S Appleman (Headteacher)**

Contact details: email: admin@jfs.brent.sch.uk Tel: 020 8206 3100

All staff have a responsibility for Safeguarding no matter what their role. These are outlined clearly in Part One of Keeping Children Safe in Education and Annex A 2016.

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

#### **Designated Safeguarding Lead (DSL) responsibilities:**

##### **Managing referrals:**

- Refer all cases of suspected abuse to the local authority children's social care and other relevant agencies, including the police;
- Support other staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Work with the Headteacher in relation to the Disclosure and Barring Service (where a person is dismissed or left due to risk/harm to a child);
- 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;
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

##### **Training:**

- DSL should attend appropriate training carried out every two years and understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

- Ensure each member of staff has access to and understands the School's Safeguarding and Child Protection policy and procedures, especially new and part time staff;
- The DSL should ensure that staff members undergo safeguarding and child protection training at induction. All staff should receive regular refresher training, at appropriate intervals, as and when required, but at least annually, to keep up with any relevant safeguarding and child protection developments;
- The DSL will recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. They will, therefore, provide opportunities for staff to feed in and shape safeguarding policy;
- Understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Be alert to the specific needs of children in need, those with special educational needs and young carers;
- Be able to keep detailed, accurate, secure written records of concerns and referrals;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

#### **Raising Awareness:**

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

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

#### **The Governing Body ensures that the School:**

- Creates a culture where the welfare of students is paramount and staff feel confident to challenge over any concerns;
- Complies with their duties under legislation - including the Prevent Duty 2015;
- Contributes to interagency working and plans;

- Takes into account LSCB procedures;
- Has a nominated governor who liaises with the Designated Officer in the event of an allegation being made against the Headteacher;
- Has an effective safeguarding policy (updated annually and on website) a staff Code of Conduct and a Behaviour Policy, which are provided to and followed by all staff;
- Has an appropriate response to children who go missing from education and inform and report to the Local Authority when required;
- Appoints a Designated Safeguarding Lead who is a member of the Senior Leadership Team, trained every year, and that the responsibilities are explicit in the role holder's job description. The DSL should be given time, funding and training to support this. There should always be cover for this role;
- Has considered how students are taught about safeguarding – PHSCE/SRE;
- Has evidence of the student voice and that there are systems in place for feedback and students views;
- Has procedures for ensuring that all parents/carers as well as prospective parents have access to and information about safeguarding policy and procedures;
- Appoints a designated Looked After Children (LAC) teacher and ensures appropriate training. Ensure staff have awareness of this group and their needs including contact arrangements;
- Have procedures for dealing with allegations of abuse made against members of staff including allegations made against the Headteacher and allegations against other children. Procedures are in place for referral to the DBS disclosure and barring service;
- Has safer recruitment procedures that include statutory checks on staff suitability to work with children and ensures recording of this. Ensures volunteers are appropriately supervised. Ensures at least one person on appointment panel is safer recruitment trained;
- Develops a training strategy that ensures all staff, including site staff and the Headteacher, receive information about the School's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated in line with any requirements of the LSCB;

**The Headteacher is responsible for:**

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

#### **4. ABUSE OF POSITION OF TRUST**

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

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

#### **5. SUPPORTING VULNERABLE STUDENTS**

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

Factors which might indicate increased vulnerability include:

##### **Violence, substance abuse and domestic violence**

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

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

##### **Fabricated or Induced Illness**

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

##### **Mental Health**

Symptoms of mental disorders/illness vary depending on the type and severity of the condition. Some general symptoms that may suggest a mental illness include: Changes in school performance, falling grades, inability to cope with daily problems and activities, changes in sleeping/eating habits, excessive complaints of physical problems, excessive worry or anxiety, self-harm.

##### **SEN**

Children with special education needs (SEN) and disabilities can face additional safeguarding challenges. Barriers can exist which prevent indications of abuse being recognised in the situation of children with these needs. These can include:

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

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

## **6. SOME CURRENT ISSUES**

There are many issues of concern affecting children today and not all can be listed here. The School will train members of staff so that there is a consistent approach in relation to following school procedures and consulting with other agencies if there are any concerns with any of our students. Some of the issues of concern, which will be addressed by school procedures include:

### **Missing Children**

A child going missing from education, which includes within the school day, is a potential indicator of abuse and neglect, including sexual exploitation. Unauthorised absences will be monitored and followed up in line with procedures, particularly where children go missing on repeated occasions. All staff will be aware of the signs of risk and individual triggers including travelling to conflict zones, FGM and forced marriage.

JFS will inform the relevant local authority of any student who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the School; system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the School;
- have been certified by the School medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the School after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the School does not reasonably believe they will be returning to the School at the end of that period; or have been permanently excluded.

JFS will notify the relevant local authority when it is to delete a student from its register under the above circumstances. This will be done as soon as the grounds for deletion are met, but no later than deleting the student's name from the register.

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

### **Child Sexual Exploitation (CSE)**

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

### **Safeguarding Female and Male students from Coercive and Controlling Behaviour**

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

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating everyday behaviour.

Coercive behaviours are defined as an act or a pattern of acts of assault, threats, humiliation and intimidation or abuse that is used to harm, punish, or frighten their victim. This definition of controlling behaviour, which is not a legal definition, includes so called “honour” based violence, female genital mutilation (FGM) and forced marriage and is clear that victims are not confined to one gender or ethnic group.

### **Female Genital Mutilation (FGM)**

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

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

### **Preventing Radicalisation**

This is part of our wider safeguarding duty. The School will intervene where possible to prevent vulnerable children being radicalised. The internet has become a major factor in radicalisation and recruitment. We will ensure safe internet filters are in place and ensure our students are educated in online safety.

Extremism has been defined by the government as the vocal or active opposition to what have been defined as fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also included in this definition of extremism are calls for the death of members of United Kingdom armed forces, whether in the United Kingdom or overseas.

Protecting children from the risk of radicalisation is part of the safeguarding duties of teachers at JFS. This responsibility is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised and teachers at JFS are expected to respond to concerns that they have about potential radicalisation as they are when concerned about other safeguarding concerns.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

In this context, JFS staff should be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection. If teachers’ have concerns in relation to a student becoming radicalised, they should contact the Designated Safeguarding Lead, using the established safeguarding processes.

The School is mindful of its duty to pay due regard to ‘Revised Prevent Duty Guidance for England and Wales (March 2015)’ and ‘The Prevent Duty – Departmental Advice for Schools and Childcare Providers (June 2015).’ The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies. The School will, as result of the Prevent guidance be further developing the School’s procedures: for identifying students at risk; working in partnership with other organisations, such as the Local Safeguarding Children Board; reviewing staff training in relation to radicalisation; reviewing our IT policies, in relation to radicalisation.

The School will ensure that there is effective engagement with parents in any situation where radicalisation is suspected. As they are a key position to also spot any evidence of radicalisation. JFS will assist and advise families who raise concerns and be able to point them to the right support mechanisms. JFS will discuss any concerns in relation to possible radicalisation with a child’s parents unless the School has a specific reason to believe that to do so would put the child at risk.

### **Private Fostering**

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

The School will follow requirements of reporting as set out by LSCB.

## **7. HELPING CHILDREN TO KEEP THEMSELVES SAFE**

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

Our approach is designed to help students to think about risks they may encounter and have help to work out how those risks might be overcome and the support available to them. Discussions about relationships and risk are empowering and enabling for all students and promote sensible behaviour rather than fear or anxiety. Students are taught how to conduct themselves and how to behave in a responsible manner. Students are also reminded regularly about online safety and tackling bullying procedures including the legalities and consequences. Curriculum programmes to prepare young people for both the practical and emotional demands of adulthood and parenthood are important but equally so are the attitudes in society which create a culture in which abuse is more likely to occur. These will be addressed throughout the curriculum. Examples would include attitudes to women and media representations of violence and this set within the context of the Jewish ethos of the School.

The School continually promotes an ethos of respect for students and the emotional health and wellbeing of our students is important to us. Students are encouraged to speak to a member of staff in confidence about any worries they may have.

However all our students are aware that if they disclose that they are being harmed or that they have, or intend, to harm another that this cannot be kept secret and that information will need to be shared.

### **Sexting**

There are a number of definitions of sexting but, for the purposes of this document, sexting is defined as images or videos generated

- by children under the age of 18, or
- of children under the age of 18

that are of a sexual or indecent nature.

The images are then shared between many people and/or adults via a mobile phone, handheld device or website, with people they may not even know.

### **Allegations of abuse made against other children**

Peer on peer abuse has a potentially extremely harmful impact on children who are subject to such abuse. The JFS Safeguarding and Child Protection policy will be developed to include procedures to minimise the risk of peer on peer abuse and to set out how allegations will be investigated and dealt with. It will reflect the different forms it can take and that it should not be tolerated or passed off as ‘banter’ or ‘part of growing up’. It will also be clear as to how victims of peer on peer abuse should be supported.

The policy will be developed to reflect the different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

Currently students who are subject to any form of activity that makes them feel unsafe are encouraged to report any concern that they have to the ‘Safeguarding Team’.

## **8. SUPPORT FOR THOSE INVOLVED IN A CHILD PROTECTION ISSUE**

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

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

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

## **9. COMPLAINTS PROCEDURE**

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a student, belittling a student or discriminating against them in some way. Complaints are managed by senior staff, the Headteacher and governors. A copy of the School’s complaints procedure can be found on the School’s website.

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

## **10. IF MEMBERS OF STAFF HAVE CONCERNS ABOUT A COLLEAGUE OR SAFEGUARDING PRACTICES**

Staff who are concerned about the conduct of a colleague or safeguarding practices within the School are undoubtedly placed in a very difficult situation.

All staff must remember that the welfare of the child is paramount and staff should feel able to report all concerns about a colleague or the safeguarding practice within the School. The School's Whistleblowing Policy (*which can be found in the Staff Handbook on the CRL*) enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Headteacher. Complaints about the Headteacher should be reported to the chair of governors.

Staff may also report their concerns directly to Social Care Direct or the police if they believe direct reporting is necessary to secure action.

## **11. ALLEGATIONS AGAINST STAFF**

When an allegation is made against a member of staff, set procedures must be followed. It is important to have a culture of openness and transparency and a consultation with the Designated Officer will happen if staff have:

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

It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. We recognise that a student may also make an allegation against an innocent party because they are too afraid to name the real perpetrator or for malicious reasons. If a child is found to continually make false allegations this may be a sign of mental health issues and a referral to services such as CAMHs (Child and Adolescent Mental Health) may be required. If the allegation is found to be malicious the child can be disciplined (following application of the relevant statutory guidance).

An uncomfortable fact is that some professionals do pose a serious risk to students and the School must act on every allegation. Staff who are the subject of an allegation, however, have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. Staff will be advised to contact their trade union and will also be given access to a named representative.

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

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

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

## **12. STAFF TRAINING AND INDUCTION**

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. All staff, including site staff and the Headteacher, will be regularly trained in Safeguarding.

The DSL will receive training every two years, including training in inter-agency procedures. They will be supported and encouraged to attend additional training to keep up to date, including forums and multi-agency training offered by LSCB and the Safeguarding Advisor.

Governors will receive strategic governor safeguarding training.

All training will be recorded and monitored to flag in advance when updates are required.

The booklet 'What to do if you're worried a child is being abused' 2015 and Part One of Keeping Children Safe in Education and Annex A 2016 (is available in the Staff Handbook on the CRL).

New staff and governors will receive an induction in safeguarding which includes the School's Safeguarding and Child Protection Policy, details for the DSL, reporting and recording arrangements specific to the School, dates of their last training, the staff Code of Conduct and the Whistleblowing Policy. Staff will sign to say they have received and understood Part 1 and Annex A of Keeping Children Safe in Education (2016).

Supply staff and other visiting staff (see also Visiting Speakers Policy) will be given the School's (**Visiting Staff Leaflet**) with a brief summary of the above.

## **13. SAFER RECRUITMENT**

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

Recruitment, selection and pre-employment vetting is carried out in accordance with Keeping Children Safe in Education 2016, including:

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

References will be sought before interview so any concerns can be explored.

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

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

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

### **Volunteers**

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

### **Contractors**

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

## **14. SITE SECURITY**

All staff are expected to wear their JFS identification badge and lanyard at all times whilst on site. Visitors to the School are asked to sign in, in necessary show ID, and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to enter through one entrance and observe the School's safeguarding and health and safety regulations to ensure children in school are kept safe. The Headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

## **15. EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS**

Where extended school activities are provided by and managed by the School, our own Safeguarding and Child Protection policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures and clarify whose procedure is to be followed if there are concerns. There will be clear communication channels to ensure the DSL is kept appropriately informed.

When our students attend off-site activities, including day and residential visits and work related activities, we will risk assess and check that effective child protection arrangements are in place. We will clarify which procedures are to be followed, with the DSL kept appropriately informed.

If alternative providers are used we will ensure they have effective safeguarding in place, with the DSL kept appropriately informed.

## **16. PHOTOGRAPHY AND IMAGES**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect students we will:

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

## **17. PHYSICAL INTERVENTION AND USE OF REASONABLE FORCE**

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

## **18. INTIMATE CARE**

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

## 19. ONLINE SAFETY

Our students increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive communications, to enticing children to engage in sexually harmful conversations, webcam photography, encouraging radicalisation or face-to-face meetings. The School's **Online safety policy** (*accessible in the Staff Handbook on the CRL*) explains how we aim to keep students safe in school. Cyberbullying and sexting by students, via texts and emails, will be treated as seriously as any other type of bullying and in the absence of a child protection concern will be managed through our anti-bullying and confiscation procedures.

Chatrooms and some social networking sites are the more obvious sources of inappropriate and harmful behaviour and students are not allowed to access these sites in school. Some students will undoubtedly be 'chatting' outside school and are informed of the risks of this through the PHSCE/SRE programme. Parents are encouraged to consider measures to keep their children safe when using social media.

Acceptable IT use for staff, students will be enforced and parents are also informed of expectations (*available on the JFS website, in the Staff Handbook on the CRL*).

## 20. CHILD PROTECTION PROCEDURES

### Categories and Definitions

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

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

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

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

#### **Physical abuse**

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

#### **Emotional abuse**

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

## **Sexual abuse**

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

Signs of sexual abuse may include:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

## **Position of Trust**

The age of consent for sexual activity is 18 years old if you are in a position of trust over that child.  
Sexual Offences Act

## **Neglect**

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

- 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.

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

## **Bullying**

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

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures. All students and parents receive a copy of the procedures on joining the School and the subject of bullying is addressed at regular intervals in PHSCE education. If the bullying is particularly serious, or the tackling bullying procedures are deemed to be ineffective, the Headteacher and the DSL will consider implementing child protection procedures.

There will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures.

## **Children with sexually harmful behaviour**

Research suggests that up to 40 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex and the School will work with other agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a student's sexual behaviour should speak to the DSL as soon as possible.

### **Indicators of abuse**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty.

However children may have no physical signs or they may be harder to see (e.g. bruising on black skin) therefore staff need to also be alert to behavioural indicators of abuse.

A child who is being abused or neglected may:

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

*(See document in the Staff Handbook on the CRL)*

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

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

### **Impact of abuse**

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some, full recovery is beyond their reach, and research shows that abuse can have an impact on the brain and its development. The rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

## Taking Action

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

It is not their responsibility to investigate or decide whether a child has been abused.

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.

If staff members have any concerns about a child (as opposed to a child being in immediate danger – (see below) they will need to decide what action to take. Wherever possible, there should be a conversation with the Designated Safeguarding Lead to agree a course of action, although any staff member can make a referral to children’s social care. Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Local Safeguarding Children Board. If anyone other than the designated safeguarding lead makes the referral they should inform the designated safeguarding lead, as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Members of staff should follow up on a referral should that information not be forthcoming. The online tool <https://www.gov.uk/report-child-abuse-to-local-council> directs you to your local children’s social care contact number.

If after a referral the child’s situation does not appear to be improving the Designated Safeguarding Lead (or the person that made the referral) should press for reconsideration to ensure their concerns have been addressed and, most importantly, that the child’s situation improves. If early help is appropriate the Designated Safeguarding Lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children’s social care if the child’s situation doesn’t appear to be improving. If a teacher, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police (See section on FGM for more detail).

If, a child is in immediate danger or is at risk of harm a referral should be made to children’s social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the Designated Safeguarding Lead the designated safeguarding lead should be informed, as soon as possible, that a referral has been made. Reporting child abuse to your local council directs you to your local children’ social care contact number.

Key points for staff to remember for taking action are:

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

### If you are concerned about a student’s welfare

There will be occasions when staff may suspect that a student may be at risk, but have no ‘real’ evidence. The student’s behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, **staff will give the student the opportunity to talk**. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine for staff to ask the student if they are OK or if they can help in any way.

Staff should record these early concerns. If the student does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the student, if the member of staff remains concerned, they should discuss their concerns with the DSL.

### **If a student discloses to you**

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

If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the student know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the student this is a matter for professional judgement. If they jump in immediately the student may think that they do not want to listen, if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise.

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

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

### **Notifying parents**

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

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

## **Records and Monitoring**

### **Why recording is important**

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

### **Cause for concerns forms**

**Any concerns about a child will be recorded ASAP** and definitely within 24 hours. All records will provide a factual and evidence based account and there will be accurate recording of any actions. Records will be signed, dated and, where appropriate, witnessed.

At no time will a staff take photographic evidence of any injuries or marks to a child's person. The body map will be used instead in accordance with recording guidance.

It may be appropriate for the DSL to open a secure safeguarding file and start a chronology page. This will help in building patterns and decision making.

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

### **The Safeguarding file**

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

It needs to be borne in mind that what constitutes a 'concern' for one child may not be a 'concern' for another and the particular child's circumstances and needs will differ i.e. a child subject to a child protection plan, looked after child, Child in Need may be looked at differently to a child recently bereaved, parental health issues etc. We will therefore use professional judgement when making this decision as will have clear links and discussions between pastoral staff and Designated Safeguarding Lead (DSL).

This file will be kept separately from the main student file and **will held securely only to be accessed by appropriately trained people. The main file will have a marker to signify that a separate file exists for that child.**

The School will keep written records of concerns about children even where there is no need to refer the matter to external agencies immediately. Each child will have an individual file i.e. no family files.

All incidents/episodes will be recorded e.g. phone calls to other agencies, in the chronology with more detail and analysis in the body of the file. This will help build a picture and help the DSL in analysis and action, which may include no further action, monitoring, whether a CAF should be undertaken, or whether a referral should be made to other agencies - Social Care Direct/Early Help Hubs in line with the Continuum of Need document and reflecting the Signs of Safety approach.

In cases where there is multi agency involvement - meetings and plans, actions and responsibilities shall be clarified and outcomes recorded.

**Files will be made available for external scrutiny for example by a regulatory agency or because of a serious case review or audit.**

Records will be kept up to date and **reviewed regularly by the DSL** to evidence and support actions taken by staff in discharging their safeguarding arrangements.

The file can be non-active in terms of monitoring i.e. a child is no longer LAC, subject to a child protection plan. If future concerns then arise it can be re-activated and indicated as such on the front sheet and on the chronology as new information arises.

If the student moves to another school, the file will be securely sent or taken, to the DSL at the new establishment/school and a **written receipt will be obtained**. There will be a timely liaison between each school's DSL to ensure a smooth and safe transition for the child. We will retain a copy of the chronology to evidence actions, in accordance with record retention guidance.

## **Referral to Social Care Direct**

The DSL will make a referral to Social Care Direct if it is believed that a student is suffering or is at risk of suffering significant harm. If there is already a social worker assigned to this case -for safeguarding reasons, the social worker should be contacted.

The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

If the situation does not appear to be improving, the School will press for reconsideration.

Any member of staff can refer to other agencies in exceptional circumstances i.e. in an emergency or when there is a genuine concern that action has not been taken.

## **Confidentiality and sharing information**

Staff will only discuss concerns with the Designated Safeguarding Lead, Headteacher or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

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

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

The Seven Golden Rules for Safeguarding Information Sharing 2015:

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

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

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

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

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

## **21. SPECIAL CIRCUMSTANCES**

### **Looked after Children**

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

## **Supporting Students in school with medical conditions**

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

## **Work Experience**

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

## **Children on overseas and exchange trips**

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

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

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

## **Related safeguarding portfolio policies**

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

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

Approved by the Curriculum Committee of the Governors

## Appendix I

### JFS SAFEGUARDING CONCERN RECORDING SHEET

Please complete this pro forma if:

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

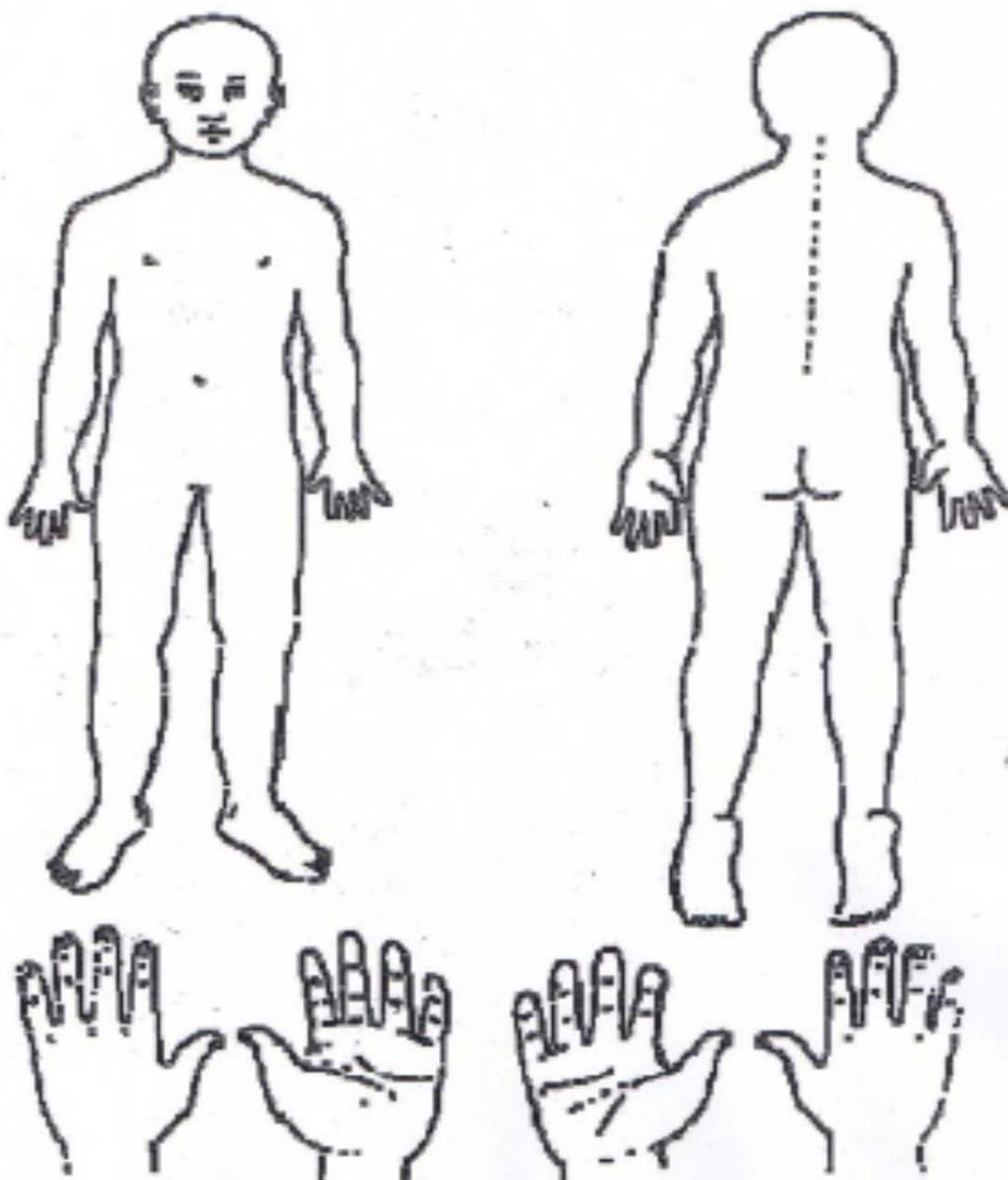
If you are not sure whether the situation requires you to complete the form, please consult with a Head of Year/Safeguarding Team, the Designated Safeguarding Lead (Talia Thoret), the Deputy Safeguarding Lead (Raynn Bruce), the Executive Headteacher (Debby Lipkin), the Headteacher (Simon Appleman) or any other member of SLT. If a child is deemed at risk of significant harm, a referral to children's social care will be made. This information will be disclosed only to those staff who need to know for the purposes of child protection. Please write legibly and do not use acronyms. Exact words must be used even if they may offend.

Date of alleged incident		Date/time of disclosure	
Name of student/s		Class/Tutor Group	
Name of person making this record		Role in school	
Signed as a true record		Date DD/MM/YY	
<p><b>Nature of concern:</b></p> <p><b>Either record:</b></p> <p>i) The reason that you have a safeguarding concern. If the reason is as a result of something physical you have noted e.g. an injury to the student's body, please use the body map on the next page</p> <p>ii) What a student has disclosed to you, which has led you to believe that there is a safeguarding concern – please ensure that your notes record the student's precise words and avoid paraphrase. These notes should be made as soon as possible after the disclosure has taken place. Please do not express any judgement, either to the student or in these notes.</p> <p>Please record the details of any potential witnesses to any incident recorded here</p> <p>Attach additional sheet(s) if necessary</p>			
	<b>Body map used (PTO)</b>	<b>Yes</b>	<b>No</b>

### Body Map

If you note any physical evidence, which has led you to conclude that there is a safeguarding concern, with respect to a particular student, please print this page, and mark/draw/note (as accurately as possible) what you have seen on the body map (below). Please give this, as soon as possible, to the Designated Safeguarding Lead (Talia Thoret), the Deputy Safeguarding Lead (Raynn Bruce), the Executive Headteacher (Debby Lipkin), the Headteacher (Simon Appleman), any other members of the Safeguarding Team or of the SLT. If a child is deemed at risk of significant harm, a referral to children's social care will be made.

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



## Appendix II

### Local Contact Details

#### AGENCIES IN BRENT

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

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

#### SOCIAL SERVICES DEPARTMENTS

Hertfordshire County Council  
Tel: 01483 737400

London Borough of Barnet  
Tel: 020 8359 4066

London Borough of Brent  
Tel: 020 8937 4300

London Borough of Enfield  
Tel: 020 8366 6565

London Borough of Haringey  
Tel: 020 8489 0000

London Borough of Harrow  
Tel: 020 8728 8806

#### JEWISH AGENCIES

Norwood  
Tel: 020 8954 4555

#### LOCAL SAFEGUARDING CHILDREN'S BOARD (LCSB) BRENT

Tel: 020 8937 4237  
Tel: 020 8937 4292

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

NSPCC Whistleblowing Helpline:  
Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)  
<http://www.nspcc.org.uk/services-and-resources/>  
Tel: 0800 0208 0285

Prevent Duty Co-ordinator (Brent): Kibibi Octave  
[kibibi.octave@brent.gov.uk](mailto:kibibi.octave@brent.gov.uk)

Child Missing from Education  
E-mail: [cme@brent.gov.uk](mailto:cme@brent.gov.uk)  
Tel: 020 8937 3313

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

Brent General Enquiries  
E-mail: [ews@brent.gov.uk](mailto:ews@brent.gov.uk)

**FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD**

