



Safeguarding (Child Protection) Policy

INTRODUCTION

For the purposes of this policy the 'School' includes **James Allen's Girls' School, James Allen's Junior School, JAGS Community Enterprises (JCE), James Allen's Saturday School Performing Arts (JASSPA) and South London Youth Orchestra SLYO** is committed to providing a safe and secure environment for children (anyone under the age of 18, but including all 6th Form students), staff and visitors and promoting a climate where children and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others. We aim to safeguard and promote the welfare of children by protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. This policy has special regard to the following legislation, guidance and core publications:

- The DfE statutory guidance Keeping Children Safe in Education (KCSIE) (September 2019)
- Children and Social Work Act 2017
- The Non-Maintained Special Schools (England) Regulations 2015 (for non-maintained special schools)
- The DfE statutory guidance in Working Together to Safeguard Children (February 2019);
- The DfE guidance, Preventing and Tackling Bullying (July 2017)
- What to do if you're worried a child is being abused (March 2015)
- Ofsted Guidance and procedures produced by the London Safeguarding Children Board (LSCB) and the Southwark Safeguarding Children Partnership.
- Prevent Duty Guidance: for England and Wales (April 2019) following the Counter-Terrorism and Security Act 2015;
- The Prevent duty: Departmental Advice for schools and childminders (June 2015);
- The use of social media for online radicalization (July 2015);
- DfE Guidance Teaching online safety in school – guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects – June 2019
- Multi-agency practice guidelines: Handling cases of Forced Marriage (June 2014);
- The Independent Schools' Standards Regulation (September 2017);
- The Early Years Foundation Stage Statutory Framework (2018);
- Schedule to the Education (Independent Schools Standards Regulations 2014);

- Information Sharing – Advice for Practitioners providing safeguarding services to children, young people, parents and carers July 2018
- JAGS Whole School Online Safety Policy 2019
- The School's Safeguarding (Child Protection (CP) policy also draws upon the duties conferred by the Children Acts 1989 and 2004, Sec 175 & 157 of the 2002 Education Act, The Children and Families Act 2014.

Other documents of relevance are outlined in Appendix A.

The policy is applicable to all on and off- site activities undertaken by pupils whilst they are the responsibility of the School. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the DSL and DDSLs will be considering the context within which such incidents and/or behaviours occur. This is known as [Contextual Safeguarding](#) which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

We will ensure that all staff read and understand Part one of the DfE guidance '*Keeping children safe in education*' (2019) and that all leaders and those working directly with children will have read and understood Annex A of KCSIE 2019 and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one. Due regard is paid to The Charity Commission ('the Commission'), the independent regulator of charities in England and Wales' advice and guidance with particular reference to their most recent alert, December 2017, as [regulatory advice under section 15\(2\) of the Charities Act 2011](#) and to the [Automatic disqualification rule changes: guidance for charities](#).

When considering safeguarding issues, regard should also be given to related JAGS' School policies: Well-Being; Health and Safety; First Aid; Pupil Code of Conduct; Staff Code of Conduct (Appendix to this Policy); Anti-bullying (including online); Educational Visits; Use of Reasonable Force; Complaints; Whistle-blowing; Equal Opportunities; Rewards and Sanctions; Recruitment.

POLICY AIMS

The purpose of this policy is to:

- Identify the names of responsible persons in the school and explain the purpose of their role
- Outline the role of the governing body
- Describe what should be done if anyone in the school has a concern about the safety and welfare of a child who attends the school
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed "vulnerable"
- Set out expectations in respect of training
- Ensure that those responsible for recruitment are appropriately trained and aware of how to apply safeguarding principles in employing staff
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non-school staff, e.g. volunteers, contractors and agency staff etc.
- Outline how complaints against staff will be handled
- Set out expectations regarding record keeping
- Clarify how children will be kept safe through the everyday life of the school
- Outline how the implementation of this policy will be monitored

All parents applying for places at this School will be informed of our safeguarding responsibilities and the existence of this policy. In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the School, parents will be notified of this as soon as possible. JAGS (incl. James Allen's Junior School) recognises the need to be alert to the risks posed by strangers or others (including the parents or carers of other pupils) who may wish to harm children in School or pupils travelling to and from School and will take all reasonable steps to lessen such risks.

RESPONSIBILITIES AND IMMEDIATE ACTION

Safeguarding and promoting the welfare of children in our school is the responsibility of the whole school community. All adults working in this School (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead or her Deputies. If staff have any concerns about a child's welfare they should act on them immediately. Information should be shared early on to protect children: and staff should not delay if, in the extremely unlikely event, the DSL and deputy DSLs are unavailable, but should speak to a member of the SLT. There should be no delay in ensuring the safety of the child and contacting local children's social care and Safeguarding partners as defined in Working Together to Safeguard Children, July 2018. The safeguarding partners are:

- a) the Local Authority (LA)
- b) the clinical commissioning group for an area any part of which falls within the LA
- c) the chief officer of police for an area any part of which falls within the LA

The Safeguarding Partners in Southwark are: Partner organisation	Lead Representative	Representative with Delegated authority
Southwark Council	Chief Executive	Strategic Director of Children's and Adults' Services
Southwark CCGG	Accountable Officer	Director of Quality and Chief Nurse
Southwark and Lambeth Police	BCU Commander	Detective Chief Superintendent

JAGS as an educational establishment is a relevant agency and is expected to cooperate with the new Safeguarding Children Partnership arrangements. Other Relevant Agencies include Probation Services, Community rehabilitation Services and CAFCASS.

The JAGS Designated Safeguarding Lead is:

Rhona Muir Rhona.Muir@jags.org.uk

The Deputy Designated Safeguarding Leads are:

Samantha Payne Samantha.Payne@jags.org.uk

Anna Jones Anna.Jones@jags.org.uk

Finola Stack (James Allen's Junior School) Finola.Stack@jags.org.uk

Elizabeth Channon (Pre-Prep) EYFS Elizabeth.Channon@jags.org.uk

The Designated Safeguarding Lead (DSL) takes lead responsibility for safeguarding and child protection (including online safety) and provides advice and support to other staff on child welfare and child protection matters, takes part in strategy discussions and inter-agency meetings, and/or supports other staff to do so, and contributes to the assessment of children. is the first point of contact for external agencies that are pursuing Child Protection investigations and co-ordinates the School's representation at CP conferences and Core Group meetings (including the submission of written reports for conferences). Although all staff should be aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments, the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL or a deputy will always be available to discuss safeguarding concerns and appropriate cover is arranged during holidays and weekends. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.

THE ROLE OF THE GOVERNING BODY

The Governing Body will ensure that they comply with their duties under legislation and that the policies, procedures and training in the school are effective and comply with the law at all times. Governors are expected to receive appropriate training on safeguarding at induction that is updated regularly. In addition, they should receive information (for example, via emails, ebulletins and newsletters) on safeguarding and child protection at least annually so that they can demonstrate knowledge of their responsibilities relating to the protection of children, young people and vulnerable adults.

The Governing Body will ensure that the school contributes to inter-agency working in line with statutory guidance "[Working Together to Safeguard Children](#)" (Feb 2019) and that the school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Southwark Safeguarding Children Partnership.

The Governing Body has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the designated governor or the headteacher.

The Governing Body has nominated Mrs Geraldine McAndrew (Governor), who has received appropriate training, as the lead Governor to take leadership responsibility for the School's safeguarding arrangements.

Concerns about and allegations of abuse made against the Head will be referred to the chair of governors who will liaise with the LA's designated officer (DO) and partner agencies and will attend any strategy meetings called in respect of such an allegation against the Head.

As a good practice, the Head will provide termly/annual report to the Governing Body outlining details of any safeguarding issues that have arisen during the term/year and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

Also as a good practice, the nominated governor will meet on a regular basis with the Designated Safeguarding Lead to monitor the school's safeguarding arrangements and both the volume and progress of cases where a concern has been raised to ensure that the school is meeting its duties in respect of safeguarding.

Information should only be shared with those who need to know.

TYPES OF CHILD ABUSE AND NEGLECT

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. As well as third party abuse, a child may abuse themselves through self-harm or substance abuse and these should be considered as safeguarding issues.

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. They may be abused by an adult or adults or another child or children. Children may be abused in a family or in an institution or community setting by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Physical abuse: a form of abuse which 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.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), 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: 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. Sexual abuse can take place online, and technology may be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education

Neglect: 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, for example, 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.

In addition to these types of abuse and neglect, members of staff will also be alert to following specific safeguarding issues:

CHILD SEXUAL EXPLOITATION (CSE)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17 year old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they can not be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the [London Child Protection Procedures](#). This will determine how and when information will be shared with parents and the investigating agencies.

'SEXTING/Youth Involved Sexual Imagery'

Creating and sharing sexual photos and videos of under-18s is illegal. The term Youth Involved Sexual imagery is a more accurate term for 'sexting' which could be seen to place responsibility with the child who is taking and/or is the subject of the image, without recognising the potential for coercion or threat in the production of that image.

Sharing youth produced sexual imagery, covers the incidents where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

When such an incident involving youth produced sexual imagery comes to a member of staff's attention, the information must be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. Staff should be aware that if a child discloses they have sent or received a potentially indecent image, **these images should NOT be printed, copied or forwarded**. Further information and advice on youth produced sexual imagery is available in the non-statutory guidance produced by the UK Council for Child Internet Safety (UKCCIS) '[Sexting in schools and colleges](#)' and the DfE's advice on *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE's Advice)* (May 2018).

PEER ON PEER ABUSE

Please see the JAGS' Peer on Peer Abuse policy for further detail.

Children are capable of abusing their peers (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:.

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalones or part of a broader pattern of abuse;
- Upskirting (now a criminal offence), which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, cause the victim humiliation, distress or alarm;
- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals

Although it is more likely that girls will be victims and boys perpetrators, all peer on peer abuse is unacceptable and will be taken seriously. We do not tolerate these or pass them off as "banter", "just having a laugh" or "part of growing up".

The school monitors behaviour incident logs stored on CPOMS and we attempt to identify behavioural trends that may be emerging across a cohort of students, at a particular time of day or in a specific location, including online.

Any possible peer on peer abuse case will be shared with the DSL or DDSL in their absence with a view to referring to appropriate agencies following the referral procedures. Any incident of peer on peer abuse will be investigated under the direction of the DSL. Information will be recorded on CPOMS and wider patterns looked for. All incidents will be dealt with in a Child Protection/ Safeguarding context. For further information, please see our Peer on Peer Abuse Policy

BULLYING

Taken from <https://www.gov.uk/government/publications/preventing-and-tackling-bullying> (July 2017 p. 6) "*When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern under the Children Act 1989. Where this is the case, the school staff should discuss with the school's designated safeguarding lead and report their concerns to their local authority children's social care and work with them to take appropriate action. Full details can be found in Part 1 of Keeping Children Safe in Education*".

The school has a strong commitment to an anti-bullying policy and will consider all coercive acts and peer on peer abuse within a Child Protection context. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the school's behaviour policy. As a school, we will minimise the risk of allegations against other pupils by providing a developmentally appropriate PSHCE syllabus and through other forums in school such as Whole School, Section and House Assemblies which develop pupils' understanding of acceptable behaviour and keeping themselves safe (including online), having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils. Occasionally allegations may be of a peer on peer abuse nature, which may include physical abuse (violence, particularly pre-planned, forcing other children to use drugs or alcohol, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), emotional abuse (blackmail or extortion, threats and intimidation), sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting) and sexual exploitation (encouraging other children to engage in inappropriate sexual behaviour e.g. youth involved sexual imagery, having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts) and initiation/hazing type violence and rituals. Any possible peer on peer abuse case must be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures.

We will always ascertain the views and feelings of all children. We acknowledge that children who are affected by abuse or neglect may demonstrate their distress through their words, actions, behaviour, demeanour, school work or other children. In all cases, we have a responsibility to ensure that we support children who are bullied and make appropriate provision for their needs. The nature and level of support will depend on the individual circumstances and the level of need. These can include a quiet word from a teacher who knows the child well, asking the pastoral team to provide support, providing formal counselling, engaging with parents, referring to local authority children's services, completing a common assessment framework or referring to Child and Adolescent Mental Health (CAMHS) services or School Counsellor (CAMHS). It is also important to consider the motivations behind bullying behaviour and whether it reveals any concerns for the safety of the perpetrator. When this is the case the children engaging in bullying may need support themselves.

Low-level disruption and the use of offensive language can in itself have a significant impact on its target. If left unchallenged or dismissed as banter or horseplay it can also lead to reluctance to report other behaviour. Early intervention can help to set clear expectations of the behaviour that is and is not acceptable and help stop negative behaviours escalating. This is also true of the use of language which is detrimental to groups such as those with SEND, race, religion, disability, nationality or LGBTQ.

THE EDUCATION AND INSPECTIONS ACT 2006

Section 89 of the Education and Inspections Act 2006 provides that maintained schools must have measures to encourage good behaviour and prevent all forms of bullying amongst pupils.

These measures should be part of the school's behaviour policy which must be communicated to all pupils, school staff and parents.

INDEPENDENT SCHOOLS' STANDARD REGULATIONS (ISSR) 2014

The Independent School Standard Regulations, revised 2018 provide that the proprietor of an Academy or other independent school ensures that bullying at the school is prevented in so far as reasonably practicable, by the drawing up and implementation of an effective anti-bullying strategy.

BULLYING WHICH OCCURS OUTSIDE SCHOOL PREMISES

School staff members have the power to discipline pupils for misbehaving outside the school premises. Sections 90 and 91 of the Education and Inspections Act 2006 say that a school's disciplinary powers can be used to address pupils' conduct when they are not on school premises and are not under the lawful control or charge of a member of school staff, but only if it would be reasonable for the school to regulate pupils' behaviour in those circumstances. This may include bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town or village centre.

Where bullying outside school is reported to school staff, it should be investigated and acted on. The Head will also consider whether it is appropriate to notify the police or the Southwark Safer Schools Officer of the action taken against a pupil. If the misbehaviour could be criminal or poses a serious threat to a member of the public, the police will always be informed. While school staff members have the power to discipline pupils for bullying that occurs outside school, they can only impose the disciplinary sanction and implement that sanction on the school premises or when the pupil is under the lawful control of school staff, for instance on a school trip.

However, our main aim is not to start our response to bullying at the point at which a child has been bullied. We endeavour to address issues between pupils which may provoke conflict in the first instance as detailed above and, through involving the entire school community including parents with whom we communicate about such issues through parent seminars and online and regular updates. Our Prefects are also trained in recognising the signs of safeguarding issues, including recognising the signs of bullying, and know to pass on any concerns to senior staff. They are a great source of support and early intervention. Any bullying incidents are recorded on CPOMS and a log made which includes the location and nature of the incident so that any emerging patterns can be addressed.

CRIMINAL LAW

Although bullying in itself is not a specific criminal offence in the UK, it is important to bear in mind that some types of harassing or threatening behaviour – or communications – could be a criminal offence, for example under the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003, and the Public Order Act 1986. If school staff feel that an offence may have been committed, they should seek assistance from the police in addition to reporting to the DSL and the Head. For example, under the Malicious Communications Act 1988, any person who sends an electronic communication which conveys a message which is indecent or grossly offensive, a threat, or information which is false and known or believed to be false by the sender, is guilty of an offence if their purpose in sending it was to cause distress or anxiety to the recipient.

Where online behaviour is concerned that is of a bullying, sexual, coercive or there are fears of radicalisation, this should be reported directly to the Designated Safeguarding Lead or Deputies in their absence.

SERIOUS VIOLENCE

Staff are aware of the potential for pupils to become involved in serious violence, the indicators being, 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, or 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. The Home Office's Preventing Youth Violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance is a point of reference. See draft KCSIE 2019, paragraphs 29 - 30.

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. Further information is available in 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "[Keeping children safe in education](#)" 2019 Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment, which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting or youth involved sexual imagery); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Problematic, abusive and violent sexual behaviours are developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviours". Advice on signs, indicators and effects of harmful sexual behaviours is available here: NSPCC <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/healthy-sexual-behaviour-children-young-people/> The term has been widely adopted in child protection and is used in this advice.

Harmful sexual behaviours can occur online and offline and can occur simultaneously between the two. Harmful sexual behaviours should be considered in a child protection context.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Pre-planning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports.

Safeguarding principles are applied on a case by case basis with the Designated Safeguarding Lead taking a leading role and using professional judgement supported by other agencies, such as children's social care and the police as required.

Disclosures of a sexual violence or harassment nature will be handled as a safeguarding concern and will be taken seriously and sensitively and as per Keeping Children Safe in Education 2019. Confidentiality will not be promised and the school will only engage staff and agencies who are required to support the children involved in any investigation.

The guidance contained in 'Sexual violence and Harassment between children in schools and colleges May 2018 will be followed closely at all times as referenced in KCSIE 2019. Risk assessments, confidentiality and anonymity will be carefully and sensitively handled. Advice will be sought from the relevant authorities and in all cases risk assessments will be carried out and the needs of both children taken into account.

Incidents may be handled internally, or with Early help support, social care and reporting to the police, with a sense of proportionality at all times. Safeguarding of both parties will be based on effective safeguarding practices and will help shape any decisions regarding support and discipline, following the DfE guidance, 'Sexual violence and sexual harassment between children in schools and colleges December 2017'.

SO-CALLED 'HONOUR-BASED' VIOLENCE (HBV)

HBV includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a child that might be at risk of HBV or who has suffered from HBV, they will share it immediately with the DSL with a view to referring to appropriate agencies.

In line with the advice contained in Multi-agency practice guidelines: Handling cases of Forced Marriage (June 2014), we:

- include material on forced marriage in the curriculum, especially in RE and PSCHÉ;
- encourage the pupils to discuss concerns about friends or themselves with adult members of the community, never treating the allegation as merely a domestic issue and sending the student back home;
- with concerns about the safety of an under 18 year old pupil activate safeguarding procedures using multi-agency liaison with police and children's social care
- will use the Forced Marriage Unit in the Foreign & Commonwealth office for support – details, Telephone: +44 (0) 20 7008 0151, Email: fmfu@fco.gov.uk

CHILD CRIMINAL EXPLOITATION: County Lines

This is a geographically wide spread form of harm that is a typical feature of county lines criminal activity: drug network or gangs groom and exploit children and young people to carry drugs and

money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation can affect any child or young person (male or female) under the age of 18 years; can still be exploitation even if the activity appears consensual; can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence; can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. A referral to the National Referral Mechanism should be considered. Further detail in KCSIE 2019 and national crime agency human-trafficking.

VIOLENCE AGAINST WOMEN AND GIRLS (VAWG)

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of “honour”; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. We also note [Southwark's VAWG Strategy](#).

FEMALE GENITAL MUTILATION (FGM)

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion.

FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.

FGM is illegal in the UK. Further detail is available here: <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

We note a new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions to report ‘known’ cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out ‘teaching work’, whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children’s homes in England. The duty does not apply in relation

to suspected cases – it is limited to ‘known’ cases’ (i.e. those which are visually identified or disclosed to a professional by the victim). The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document [“Mandatory Reporting of Female Genital Mutilation – procedural information”](#). A useful summary of the FGM mandatory reporting duty is available in [FGM Fact Sheet](#).

It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. Teachers in our school will personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they will still discuss any such case with the designated safeguarding lead (or deputy) with a view to involving children’s social care as appropriate.

GANGS

The role of safeguarding at JAGS in relation to gangs is both preventative and responsive – responding to the needs of those young people who may be involved in gangs and at risk of harm. We will work with the Safer School’s Officer and the Southwark Safer Schools Team to educate students about the risks of being drawn into gangs.

PREVENTING RADICALISATION

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children’s services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (“the Prevent duty”). Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media. Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.

Example indicators that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected extremists; changing their style of dress or personal appearance to accord with the group; their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause; loss of interest in other friends and activities not associated with the extremist ideology, group or cause; possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups); attempts to recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another group; speaking about the imminence of harm from the other group and the importance of action now; expressing attitudes that justify offending on behalf of the group, cause or ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.

Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

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 that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to Southwark Multi Agency Safeguarding Hub ([MASH](#)). The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

PRIVATE FOSTERING

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives. Staff should be alert to, and, when it comes to their attention, report, via the DSL to the local authority, information which suggests a child is being privately fostered

The law requires that Southwark Council should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

If we become aware of a child in a private fostering arrangement within Southwark, we will notify the council's Multi Agency Safeguarding Hub ([MASH](#)) by emailing MASH@southwark.gov.uk or calling **020 75251921**. Out of hours – 020 7525 5000.

Advice about whether there is a need to notify the council, can be obtained by calling **07539 346808** or sending an email to privatefosteringadvice@southwark.gov.uk.

REFERRALS

Where there is a safeguarding concern, we take into account the child's wishes and feelings when determining what action to take and what services to provide. We have systems in place for children to express their views and give feedback. We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or other children. Ultimately, all our systems and processes operate with the best interests of the child at heart. Prior to any Early Help referral, the Pastoral Team, including the school CAMHS counsellor and School Chaplain would support the child and family.

Referrals to services regarding concerns about a child or family typically fall into three categories:

Early Help Services;

Child in need - Section 17 (Children Act 1989) referrals; act immediately, refer to DSL (or DDSL in absence), use early help including pastoral support/ children's social care as appropriate

Child protection - Section 47 (Children Act 1989) referrals; act immediately. Refer to the DSL (DDSL in absence, children's social care/police if crime committed).

Anyone can make a referral. However, the DSL is likely to have the fullest picture of the child's experience so would ordinarily be responsible for making the referral.

[The Southwark Safeguarding Board Multi Agency Threshold Guide](#) sets out the different levels of need and detailed guidance about how concerns within these different levels should be responded to by Southwark agencies. We also refer to the threshold guides for our pupils' borough of residence being mindful of 'County Lines' vulnerabilities.

Safeguarding referrals should be made to Southwark Multi Agency Safeguarding Hub ([MASH](#)) via the [Inter Agency Referral Form \(IARF\)](#) and copied to the LA's Schools Safeguarding Coordinator. Prior to any written IARF being sent as a referral to social care, there should be a verbal consultation with the MASH social worker or manager, by calling the duty desk on **020 7525 1921**, to ensure that making a referral is an appropriate action. The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, Honour Based Violence, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral. When we make a referral, the local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let us, as the referrer know the outcome. We will follow up if this information is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, we will consider following local escalation procedures to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

The [Early Help Referral Form](#) will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services.

Any child may benefit from early help, but all staff need to be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific educational needs
- Has special educational needs (whether or not they have a statutory education, health and care plan);
- Is a young carer;
- Is showing signs of being drawn into anti-social behaviour, including gang involvement and association with organized crime groups
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. **If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested.**

Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation. All cases requiring investigation would be referred to the Local Authority's DO in the first instance. Under no circumstances would the school investigate first without referring to the Local Authority's DO.

VULNERABLE PUPILS

Particular vigilance will be exercised in respect of pupils who are subject to a Child Protection Plan and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the LA's Schools Safeguarding Coordinator). If the pupil in question is a Looked-After child, this will also be brought to the notice of the Designated Person with responsibility for children in public care. The School's Designated Teacher for Looked-after and Previously Looked-after Children (the Designated Safeguarding Lead) will work with the virtual school head, who manages pupil premium plus for looked after children, to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher will also work with the virtual school head to promote the educational achievement of previously looked after children. We note the DfE's statutory guidance [Designated teacher for looked-after and previously looked-after children](#).

We acknowledge that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This 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. If a pupil discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the Designated Safeguarding Lead as a safeguarding issue.

The School also acknowledges the additional needs for support and protection of children who are vulnerable by virtue of homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions, pupils who are excluded from school and pupils where English is an additional language, particularly for very young children, using the translation service if necessary. Those pupils who are LGBTQ should also be considered as vulnerable.

Where there are concerns about a child/families potential or actual homelessness the Designated Safeguarding Lead or Deputies in their absence will refer the family to the Local

Housing Authority. This would not replace referrals to children's social care where a child is being harmed or is at risk of being harmed. With 16-17 year olds, homelessness may not be family based and an appropriate referral will be made to children's services where necessary.

The most common reason for children becoming looked after is as a result of abuse/and or neglect. Appropriate staff will be given the information in relation to a child's looked after status including contact and care arrangements. The DSL will ensure that they have the details of the child's social worker and the name of the virtual school head in the authority who looks after the child. Looked after children and previously looked after children will be appointed a designated teacher who will work with the local authority to promote the educational achievement of registered pupils who are looked after. Designated teachers also have a responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangements orders or who were adopted from state care outside England and Wales. Looked after children and previously looked after children are a particularly vulnerable group. The DSL will have details of the LA Personal Advisor and will liaise with them as necessary regarding any issues of concern affecting a care leaver.

THE EQUALITY ACT 2010

A key provision in The Equality Act 2010 is the Public Sector Equality Duty (PSED), which came into force on 5 April 2011 and covers age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation, the '**protected characteristics**'. The Duty requires public bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act
- advance equality of opportunity between people who share a protected characteristic and people who do not share it
- foster good relations between people who share a protected characteristic and people who do not share it.

Maintained schools and Academies are required to comply with the PSED. In addition, Part 6 of the Act makes it unlawful for the responsible body of a school to discriminate against, harass or victimise a pupil or potential pupil in relation to admissions, the way it provides education for pupils, provision of pupil access to any benefit, facility or service, or by excluding a pupil or subjecting them to any other detriment. To be clear, JAGS interprets its 'girls' to include all pupils whether they identify as boys or girls or are gender neutral. In England and Wales Part 6 of the Act applies to maintained schools and Academies and to other independent schools.

In addition to the duties in relation to pupils with disabilities under the Equality Act, schools also have duties under Part 3 of the Children and Families Act 2014 to ensure that pupils with special educational needs engage in the activities of the school together with children who do not have special educational needs.

TRAINING

All staff members will receive appropriate safeguarding and child protection training (including Prevent and online safety) which is regularly updated. A yearly whole school update takes place at the beginning of the Autumn term. This is compulsory for all staff. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. All newly recruited staff (teaching and non-teaching) and Governors will be appraised of this policy and will be required to attend relevant LA or Safeguarding

Partnership training. In addition, all new staff and temporary staff will be required to attend an induction session with the Designated Safeguarding Lead or their deputy on their first day in the school. All new staff complete the JAGS Safeguarding Induction programme which includes online training. This will include discussion of the policies below which will have been provided on securing a position at the school.

- The Safeguarding (Child Protection) Policy including role and identity of DSLs/DDSLs. This policy also includes the Safeguarding response to children who go missing from education (CME)
- Annex A to The Safeguarding (Child Protection) Policy – Staff Code of Conduct including acceptable use of IT, staff/pupil relationships and communications using social media
- KCSIE 2019 Part one (all staff)
- KCSIE 2019 Annex A (leaders and those who work directly with children)
- Peer on Peer Abuse
- Behaviour Policy
- Whistle Blowing Policy
- Whole school Online Safety Policy

All staff are required to read at least Part 1 of KCSIE 2019 and those in direct regulated contact with children must read Annex A. A questionnaire is completed to ensure understanding. All staff must also read this policy and Appendix A (Staff Code of Conduct). This also includes an appendix of 'Training Advice - John Guest' which was delivered to the whole school.

The Designated Safeguarding Lead (and their Deputies) will attend the LA's dedicated induction course and then refresher training at least every two years. The designated safeguarding lead will also undertake Prevent awareness training and will be able to understand the unique risks associated with online safety. In addition to this formal training, their knowledge and skills will be refreshed (for example, via e-bulletins, meeting other designated safeguarding leads or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role. Designated staff will be encouraged to attend appropriate network meetings and to participate in the [multi-agency training programme](#) organised by the Southwark Safeguarding Children SSCP Partnership.

RECRUITMENT

JAGS is committed to the principles of safer recruitment and, as part of that, adopts recruitment procedures that help deter, reject and/or identify people who might abuse children. Safe recruitment processes are followed and all staff recruited to the school will be subject to appropriate identity, qualification and health checks. References will be verified and appropriate criminal record checks [Disclosure and Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the school, as outlined in Part three of the DfE guidance "[Keeping children safe in education 2019](#)". We will also have regard to DfE's statutory guidance for schools about the employment of staff disqualified from childcare "[Disqualification under the Childcare Act 2018](#)", which also contains information about 'disqualification by association'.

Disqualification by Association now only applies in domestic settings, not schools.

Disqualification under the Child Care Act still applies to staff themselves who work in a child care capacity, whether paid, volunteer or are on work placements.

Relevant staff are those working in child care, or in a management role because they are: working with reception age children at any time; or working with children older than reception until age eight, outside school hours. Relevant members of staff and governors who are involved in recruitment will undertake safer recruitment training. The school will ensure that at least one person on any appointment panel has undertaken safer recruitment training in line with staffing regulations.

This School will only use employment agencies which can demonstrate that they positively vet their supply staff and will report the misconduct of temporary or agency staff to the agency concerned and to the LA. Staff joining the School on a permanent or temporary basis will be given a copy of this policy. Additionally, the Staff Handbook confirms the Safeguarding (CP) procedures within the School.

Prohibition checks will include overseas checks and where relevant, European Economic Area checks for new members of staff who have joined the school since 5 September 2016. Other groups subject to appropriate checks are existing staff, agency and third party staff and trainee/student teachers. Some overseas qualified teachers can apply to the Teaching Regulation Agency (TRA) for the award of qualified teacher status (QTS) in England.

For those engaged in management roles, including Governors and internal staff promotions, (in independent schools, including academies and free schools) an additional check will be carried out to ensure that they are not prohibited under section 128 provisions.

Checks will be carried out via the Secure Access Portal via the Teacher Services' web page. The Teacher Service's System should be used to verify any award of QTS and the completion of induction/probation. An enhanced DBS certificate should be obtained when trainees teachers engage in regulated activity.

References will be taken up from a senior person with appropriate authority prior to an appointment being confirmed, including for any internal candidate. Where electronic references are received, we will ensure that they originate from a legitimate source. If a member of staff moves from a position that did not involve the provisions of education to one that does, it must be treated as if the individual were a new member of staff and all required pre-appointment checks must be carried out.

VISITING SPEAKERS

All visiting speakers to the school will be subject to reasonable and appropriate vetting procedures and criminal record checks. Please refer to the School's Visiting Speakers' Risk Assessment and Guidance 2018.

VOLUNTEERS

Any parent or other person/organisation engaged by the School to work in a voluntary capacity with unsupervised or regular access to pupils will be subject to all reasonable and appropriate vetting procedures and Criminal Records Checks.

Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Volunteers who on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in our school are deemed to be in regulated activity. We will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However,

we may conduct a repeat DBS check (which will include barred list information) on any such volunteer should we have any concerns.

The law has removed supervised volunteers from regulated activity. There is no legal requirement to obtain a DBS certificate for volunteers who are not in a regulated activity and who are supervised regularly and on ongoing day-to-day basis by a person who is in regulated activity, but an enhanced DBS check without a barred list check may be requested following a risk assessment.

Further information on checks on volunteers can be found in Part three of the DfE guidance ["Keeping children safe in education 2019"](#).

Volunteers will be subject to the same code of conduct as employees of the School.

Voluntary sector groups that operate within this School, or provide off-site services for our pupils or use School facilities, will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by the Southwark Safeguarding Children Partnership. Premises lettings and loans are subject to acceptance of this requirement.

WORK PLACEMENTS

If work placements are organized by the school, the school will ensure that the placement provider has policies and procedures in place to safeguard students.

CHILDREN STAYING WITH HOST FAMILIES

JAGS recognises the value of foreign visits and the benefit that these can bring to learning. Annex E of KCSIE 2019 states that when arranging homestays, the suitability of the adults in UK host families engaging in regulated activity is considered. The school is the regulated provider when it has the power to terminate the arrangement and that it will be committing a criminal offence if it knows, or has reason to believe that an individual is barred but the Disclosure and Barring Service if it allows that individual to carry out any form of regulated activity. JAGS will ensure that the appropriate checks are carried out on all UK host families if it arranges the homestay. Where families make their own arrangements, JAGS will not be the regulated provider.

It is not possible for schools and colleges to obtain criminality information from the DBS about adults who provide homestays abroad. JAGS will liaise with partner schools abroad to establish a shared understanding of, and agreement to the arrangements in place for the visit. All available checks will be carried out in respect of those providing homestay outside of the UK.

PUPILS VOLUNTEERING OUTSIDE OF SCHOOL

Pupils are encouraged to give back to the community through an extensive range of volunteering opportunities. In respect of those positions where they volunteer for an organisation, written assurances are given by the organisation stating that the relevant checks are in place for all staff. Where pupils arrange the voluntary placements themselves, but through a school link, it is made clear to pupils and parents that the school has not carried out any checks. All pupils are given regular safeguarding training focused on their personal safety at, to and from venues and reporting concerns about others.

STAFF CODE OF CONDUCT

All staff (paid and voluntary) are expected to adhere to the Staff Code of Conduct (Appendix A) in respect of their contact with pupils and their families. The Teachers' Standards 2012 state that all teachers, including headteachers, should safeguard children's wellbeing and maintain public trust

in the teaching profession as part of their professional duties. Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the School's Behaviour Policy including reference to the DfE Advice Behaviour and Discipline in Schools (January 2016). Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary physically to restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Head and parents. Any physical restraint used will comply with DfE guidance *'Use of reasonable force in schools'* (2013) reviewed July 2015 and the school policy May 2018. 'Reasonable force' in these circumstances means 'using no more force than is needed'. This could include guiding a child to safety by the arms, to more extreme circumstances such as breaking up a fight where a young person needs to be restrained to prevent violence or injury. The use of force can involve either passive physical contact such as blocking a door or active physical contact such as leading a pupil by the arm out of a classroom. The guidance also refers to how this applies to incidents involving children with SEN or disabilities or with medical conditions.

Except in cases of emergency, first aid will only be administered by qualified First Aiders (in EYFS by a paediatric trained First Aider). If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present. If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot. All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers at the earliest opportunity.

Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a Medical Plan that has been agreed with the parents and health authority.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Other than in formal teaching situations; including musical instrument tuition, the door to the room in which the 1:1 coaching, counselling or meeting is taking place should be left open. Where this is not practicable because of the need for confidentiality, another member of staff will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting. All teaching rooms will have clear and unobstructed glass panels in the doors.

School staff should also be alert to the possible risks that might arise from social contact with pupils outside of the School. Home visits to pupils or private tuition of pupils should only take place with the knowledge and approval of the Head. Visits/telephone calls by pupils to the homes of staff members should only occur in exceptional circumstances and with the prior knowledge and approval of the Head. Any unplanned contact of this nature or suspected infatuations or "crushes" will be reported to the Head. Staff supervising off-site activities or school journeys will be provided with a school mobile telephone as a point of contact for parents and carers.

All staff will only use the school's digital technology resources and systems for Professional purposes or for uses deemed 'reasonable' by the Head and Governing Body. Staff will only use the approved school email, school Learning Platform or other school approved communication systems with pupils or parents/carers, and only communicate with them on appropriate school business. Staff will not disclose their personal telephone numbers and home email addresses to pupils or parents/carers.

Staff will not use personal or school cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission. Photographs of pupils must not be

stored at home. School camera memory cards should be downloaded on to school computers only. Personal memory cards should never be put into school cameras, and school memory cards should never be put in to personal cameras. Should any member of staff become aware of inappropriate or non-essential use of camera phones, including iPADS, devices and cameras, this should be reported to a member of SLT. In addition, for EYFS, photographs will be taken for the purpose of recording a child or group of children participating in activities or celebrating their achievements and in an effective way to record their progress and development. All such images will be appropriately stored on school equipment.

Parents, carers or relatives may only take still or video photographic images of pupils in school or on school- organised activities with the prior consent of the school and then only in designated areas. Images taken must be for private use only. Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film. Without this consent, the Data Protection legislation would be breached. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

The following statement appears on all our programmes and event information and parents are advised before an event that: *'Photographs and short films taken by parents should be kept to a minimum to avoid distracting the girls who are performing and members of the audience. All images should be for personal use only. In respect of our Safeguarding (Child Protection) Policy, under no circumstances should any images be uploaded onto social or online media of any kind. Thank you for your co-operation.'*

Staff should be aware of the school's whistle-blowing procedures and share immediately any disclosure or concern that relates to a member of staff with the Head or one of the Designated Safeguarding Leads if the Head is not available and nothing should be said to the colleague involved. It should be shared with the Chair of Governors if it relates to the Head.

CONTRACTORS

Building contractors who are engaged by or on behalf of the school to undertake works on site will be made aware of this policy and the reasons for it. Long-term contractors who work regularly in the school during term time will be asked to provide their consent for DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the senior management deem this to be appropriate. During major works, when large numbers of workers and sub-contractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors or their employees to have direct access to pupils in nonteaching sessions. All contractors and sub-contractors will be issued with copies of the school's code of conduct for staff.

Individuals and organisations that are contracted by the School to work with, or provide services to, pupils will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or supervision of children regularly). Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances we will allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity. We will determine the appropriate level of supervision depending on the circumstances.

We will always check the identity of contractors and their staff on arrival at the School.

LETTINGS

The welfare of children and young people is with those responsible for their care. Where external organisations are using the schools' premises, hire arrangements make it clear. Appropriate checks are made as to the suitability of the hirer and hirers will also be asked to sign a copy of the Safeguarding Policy (including the Appendix) even when the organisation have their own. The organisation will be risk assessed appropriately prior to agreeing to the letting. The Hire agreement stipulates that the hirer shall abide by the school's Safeguarding (Child Protection) Policy, and sign the agreement to acknowledge that the safeguarding policy has been read and that all concerns relating to abuse of children and vulnerable adults will be reported to the relevant statutory authority. Relevant members of staff involved with lettings have safeguarding training to DSL level.

COMPLAINTS/ALLEGATIONS MADE AGAINST STAFF

JAGS takes seriously all complaints made against members of staff. Procedures are in place for pupils, parents and staff to share any concern that they may have about the actions of any member of staff, including the Designated Safeguarding Lead or Deputies, or volunteer. All such complaints must be brought immediately to the attention of the **Head** or the Designated Deputy Safeguarding Leads (or DDSLs) if the Head is not available and nothing should be said to the colleague involved. In cases where the Head is the subject of the allegation or concern, they will be reported to the Chair of Governors and the Governor responsible for Safeguarding, in order that they may activate the appropriate procedures. The matter will not be discussed with the Head. It is the duty of the Chair of Governors to immediately report to the Local Authority's Designated Officer if any concerns are raised about the Head. These procedures are used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) in a school or college that provides education for children under 18 years of age has:

- behaved in a way that has harmed a child, 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 he or she may pose a risk of harm if they work regularly or closely with children.

The Local Authority's Designated Officer(s) (LADO) should be informed of all allegations that come to a school's attention and appear to meet the criteria. Contact can also be made with LA's Schools Safeguarding Coordinator who will liaise with the DO. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements will be followed to resolve cases without delay.

Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the DO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and London SCB procedures. This process will agree upon the appropriate course of action and the time-scale for investigations.

The School has a legal duty to refer to the DBS anyone who has harmed, or may pose a risk of harm, to a child or vulnerable adult and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals will be made as soon as possible after the resignation or removal of the individual. As an independent school, where such a case does not meet the threshold for a DBS referral, consideration will be given to making a professional misconduct referral to the Teaching Regulation Authority, the agency for the Department of Education from 1 April 2018, where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and

a prohibition order may be appropriate. It should be noted that there remain a number of individual who are still subject to disciplinary sanctions which were imposed by the GTCE prior to its abolition in 2012. 'KCSIE 2019 Part four: Allegations of abuse made against teachers and other staff' will be referred to.

Allegations against a teacher who is no longer teaching will be referred to the police. Non-recent allegations of abuse will also be referred to the police as per Para 185 KCSIE 2019

For children in the Early Years Foundation Stage (EYFS) the School will also inform Ofsted, as soon as is reasonably practicable, but at the latest within 14 days, of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

The full procedures, including timescales about dealing with allegations of abuse made against teachers and other staff can be found in Part Four of the DfE guidance "Keeping Children Safe in Education 2019".

The Chair of Governors is: Mr David Miller

The Vice-chair is: Mrs Helen Nixseaman

Both can be contacted via The Clerk to the Governors at JAGS, Jason Peck, 020 8613 6331 email: Jason.Peck@jags.org.uk

The School's Local Safeguarding Children Board (LSCB) is Southwark, which operates the Southwark Safeguarding Children Partnership working under the advice and support of the London Safeguarding Children's Board. We liaise with the Southwark Schools Safeguarding Coordinator, the Local Area Designated Officer (LADO) and the Southwark referral and assessment team. We also work with a number of other Local Authorities for those pupils who reside in different home boroughs to the school. All staff are reminded that they may raise concerns directly with Children's Social Care Services.

The Local Authority Designated Officer (LADO) for Southwark is:

Eva Simcock 020 7525 0689 Eva.Simcock@southwark.gov.uk

To whom allegations should be referred for allegations/complaints made against adults.

There is also a duty system and one of the CP Coordinators in Quality Assurance Unit is on duty each day to deal with DO issues when DO is unavailable. Duty telephone number for enquiries/referrals is 020 7525 3297

The LA's Strategic Lead Officer for safeguarding in education services is: the Director of Education Nina Dohel 020 7525 3252. Nina.Dohel@southwark.gov.uk

The LA's Schools Safeguarding Coordinator is: Apo ÇAĞIRICI 020 7525 2715 Apo.Cagirci@southwark.gov.uk

The LA's Family Early Help Service Duty Manager: 020 7525 3893

Family Early Help Service General Education Enquiries: 020 7525 2714

We also note the [‘Safeguarding information for professionals and the community in Southwark’](#) on Southwark Council’s website.

The Safer Schools Officer is: PC Grant Seager

Phone T) 02072327040 M) 07464492107

Email G.D.P.SEAGER2@met.police.uk

Address PECKHAM POLICE STATION, 115 PECKHAM HIGH STREET SE15 5SL

RECORDS & GDPR

We follow the guidance ‘Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers’ July 2018 and the seven golden rules to sharing information. The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping young people safe. Brief and accurate written notes will be kept of all incidents and child protection or child in need concerns relating to individual pupils.

Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as ‘special category personal data’. Schools should not under the GDPR as supplemented by the Data Protection Act 2018 provide pupils’ education data where the serious harm test under that legislation is met. Therefore, in a situation where a child is in a refuge, this could mean that schools can withhold education data under the GDPR; they should do so where the serious harm test is satisfied.

Staff who need to share ‘special category personal data’ are aware that the Data Protection Act 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Safeguarding and Child Protection files are kept securely using the Child Protection Online Management System which is fully GDPR May 2018 compliant. The effective recording of this information is significant especially if the incident or the concern does not lead to a referral to other agencies. This information may be shared directly with other agencies as appropriate. All contact with parents and external agencies will be logged on CPOMS and these will be kept as CP records. The School will take into account the views and wishes of the child who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous “secrets”.

Child protection records are not open to pupils or parents. All CP records are kept securely by the Designated Safeguarding Lead and separately from educational records through CPOMS filtering systems. They may only be accessed by the Designated Safeguarding Lead, their Deputy and the senior managers of the School.

The content of Child Protection Conference or Review reports prepared by the school will follow the Headings recommended by Children’s Services and will, wherever possible, be shared with the parents/carer in advance of the meeting.

Child protection records are not open to pupils or parents. All CP records are kept securely by the Designated Safeguarding Lead and separately from educational records through CPOMS filtering

systems. They may only be accessed by the Designated Safeguarding Lead, their Deputy and the senior managers of the School.

The content of Child Protection Conference or Review reports prepared by the school will follow the Headings recommended by Children's Services and will, wherever possible, be shared with the parents/carers in advance of the meeting.

Child Protection records will be sent to receiving schools separately from the main pupil file and under a confidential cover when pupils leave the school, ensuring secure transit and a confirmation of receipt will be obtained. The Designated Safeguarding Lead will also consider whether it would be appropriate to share any information with the new school or college in advance of a child leaving to ensure that support is in place for when the child arrives. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives. For pupils starting at the school a letter signed by the DSL/Head is requested to confirm that there are no child protection or safeguarding concerns or other details where appropriate. When we receive child protection records from other schools, we will ensure key staff such as the DSL and SENCO are aware as required.

If a pupil is withdrawn from the School having not reached the normal date of transfer; due to a family move or any other reason, all efforts will be made to identify any new address and the School to which they are being admitted and to ensure that their educational records are sent without delay to that School. If the parent/carers fails to provide this information, an urgent referral will be made to the Family Early Help Service (EHS) either through the EHS Duty Officer or through the School's Single Point of Contact (SPOC) or the Family EHS Duty Manager in order that they might make further enquiries. If this School receives educational records concerning a child who is not registered with us, the records will be returned to the sending School with a note, advising them to refer to their LA's Education Welfare Service. **A child's name will only be removed from the School's Admissions Register in accordance with the Pupil Registration Regulations or with the authorisation of the Team Manager in the Family Early Help Service.**

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

We will inform the Local Authority when we are about to add or delete a pupil's name from the school admission register for any reason in line with Southwark's [Children Missing Education \(CME\) Protocol](#).

CHILDREN MISSING FROM EDUCATION

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should also be aware of the school's unauthorised absence and procedures as outlined in the schools' 'Child Missing from School' policy.

Parents are asked to provide two emergency contact numbers for each pupil. This goes beyond the legal minimum and is good practice to give the school or college additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their written consent.

Further information on schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school role at standard and non-standard transition points can be found in the department's statutory guidance: children missing education.

Further information for colleges providing education for a child of compulsory school age can be found in: full-time-enrolment of 14 to 16 year olds in further education and sixth form colleges. General information and advice for schools and colleges can be found in the Government's missing children and adults strategy.

When a pupil ceases to be registered at this school and becomes a registered pupil at another school in England or Wales, we will send a Common Transfer File (CTF) to the new school via DfE's secure internet system called school2school.

We will upload CTFs of pupils who have left but their destination or next school is unknown or the child has moved abroad or transferred to a non-maintained school to a searchable area of the school2school website commonly referred to as the 'Lost Pupil Database'. If a pupil arrives in our school and the previous school is unknown, we will search the database for any record of the child.

The School will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate. We will maintain accurate and up to date records of those with Parental Responsibility and emergency contacts. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their written consent.

We will take actions according to Southwark's [Protocol for Children who are Uncollected from School](#) when pupils who ordinarily do not make their own way home are not collected by their parents/carers at the end of the school day or from after school clubs and activities and when any children with Special Educational Needs who are transported from school cannot be dropped-off at their home or meeting point due to the absence of the parent or carer. Staff are made aware of the school's procedures to be followed in the event of a child missing from school.

SAFETY IN THE SCHOOL

No internal doors to classrooms will be locked whilst pupils are present in these areas. Entry to School premises will be controlled by doors that are secured physically or by constant staff supervision or video surveillance. Authorised visitors to the School will be logged into and out of the premises and will be asked to wear their identity badges or be issued with School visitor badges. Unidentified visitors will be challenged by staff or reported to the Head or School Office. Carelessness in closing any controlled entrance will be challenged.

The presence of intruders and suspicious strangers seen loitering near the school or approaching pupils, will be reported to the Police by calling 101 or 999, depending on the circumstances and the urgency of the case so that if the police stop these individuals they can be spoken to about what they were doing and dealt with accordingly. Brief information about the incident will be sent to LA's Schools Safeguarding Coordinator with a view to alerting other local schools in liaison with the police and through appropriate systems. The local School's Police liaison officer will also be contacted.

Parents, carers or relatives may only take still or video photographic images of pupils in school or on school-organised activities with the prior consent of the school and then only in designated areas. Images taken must be for private use only. Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film.

Without this consent the Data Protection legislation would be breached. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

CURRICULUM

JAGS acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of our pupils for the responsibilities of adult life and citizenship. We will ensure that children are taught about safeguarding, including online safety and will consider this as part of providing a broad and balanced curriculum. It is expected that all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils. As appropriate, the curriculum will be used to build resilience, help pupils to keep safe, including online safety and to know how to ask for help if their safety is threatened. The three categories of risk: CONTENT, CONTACT and CONDUCT are the basis of our online safeguarding and education.

The School uses two levels of internet filtering systems - esafe (proactive monitoring service) and smooth wall (email and web filter). Pupils are not allowed to use mobile phones during the school day unless under staff supervision. Pupils must access the JAGS wi-fi and not 3G /4G when using devices in lessons.

As part of developing a healthy, safer lifestyle, pupils will be taught, for example;

- to recognise and manage risks in different situations, including online and then decide how to behave responsibly; to judge what kinds of physical contact are acceptable and unacceptable;
- to recognise when pressure from others (including people they know) threatens their personal safety and well-being; including knowing when and where to get help; to use assertiveness techniques to resist unhelpful pressure emotional literacy.

Where necessary we will work with external agencies to support this work, for example via The Agencies Supporting Southwark Programme ([ASSP](#)), which is the quality assurance gateway for all organisations and individuals wishing to work with Southwark's children and young people.

All computer equipment and internet access within the School will be subject to appropriate “parental controls” and Internet safety rules in line with our Online Safety Policy. We will be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

PSHCE

At JAGS, extensive learning on relationships through our PSHCE education curriculum, based on the PSHCE Association’s programme of study underpins teaching about acceptable behaviours.

Integral to this is the importance of engendering an open atmosphere within the school whereby adults, as well as children, feel able and confident to report any incidents of concern and to know that these will be handled sensitively and in a timely manner.

Our PSHCE schemes of work build on prior knowledge, with the importance of healthy relationships developed during earlier years and a focus on specific aspects – including teen relationship violence, sexual exploitation and coercion – at an appropriate stage. Our policies outlined at the beginning of the document, Appendix A and pastoral support system addresses these issues. Further opportunities to teach safeguarding are through Relationships Education (for all primary

schools); Relationships and sex education (for all secondary schools) and Health Education. These are all mandatory from September 2020 although JAGS already covers these areas in our PSHCE curriculum.

HEALTHY SCHOOLS

JAGS will work with partners to promote a whole healthy school approach and achieving the “Healthy School London” status – including a focus on the curriculum with the aim of: Developing a school ethos, culture, spiritual, moral, social and cultural (SMSC) development provision and environment which encourages a healthy lifestyle for all pupils, including the vulnerable; Using the full capacity and flexibility of the curriculum to help pupils to be safe and healthy; Ensuring that food and drink available across the school day reinforce the healthy lifestyle message;

- Providing high quality PSHCE including Relationship and Sex education (RSE) as part of Personal Development and Health Education as a fundamental part of our PSHCE curriculum. Covering relevant issues through Relationships Education and Relationships and Sex Education (formerly known as Sex and Relationship Education) and/or where delivered, through our PSHCE curriculum. We note the Government’s regulations which will make the subjects of Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) mandatory from September 2020.
- Providing high quality Physical Education (PE) and sport to promote physical activity;
- Promoting an understanding of the full range of issues and behaviours which impact upon lifelong health and wellbeing, including emotional wellbeing and mental health;
- Working in partnerships with parents/carers, local communities, external agencies and volunteers to support health and wellbeing of all pupils including the vulnerable.

WORKING IN PARTNERSHIP WITH PARENTS

It is our policy to work in partnership with parents or carers to secure the best outcomes for our children. We will therefore communicate as clearly as possible about the aims of this School:

We will use clear statements in our brochures and correspondence.

We will involve pupils in the development of Codes of Conduct and Behaviour policies and communicate these to parents.

We will liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families.

We will be alert to the needs of parents/carers who do not have English as their first language and will utilize the translation services as necessary

We will distribute the LA’s leaflet for parents, “**Protecting Children in Education Settings**”

We will make available a copy of this policy to any parent who requests it. The policy will also be available through the school’s web site.

We will keep parents informed as and when appropriate of safety issues within the locality and online.

All computer equipment and internet access within the School will be subject to appropriate “parental controls” and Internet safety rules and in line with e-safety policy.

We will hold regular information evenings and presentations for parents regarding online safety and general information regarding safety and wellbeing.

MONITORING AND EVALUATION

The governing body will monitor the safeguarding arrangements in the school to ensure that these arrangements are having a positive impact on the safety and welfare of children. This will be evaluated on the basis of evidence of:

- the extent to which a positive culture and ethos is created where safeguarding is an important part of everyday life in the school, backed up by training at every level
- the content, application and effectiveness of safeguarding policies and procedures, and safer recruitment and vetting processes
- the quality of safeguarding practice, including evidence that staff are aware of the signs that children may be at risk of harm either within the setting or in the family or wider community outside the setting
- the timeliness of response to any safeguarding concerns that are raised the quality of work to support multi-agency plans around the child.

COMPLAINTS

All complaints arising from the operation of this policy will be considered under the Whole School Complaints Policy 2019 with reference to the LA’s Strategic Lead Officer for safeguarding in education services as necessary.

The Governing Body of the School will consider safeguarding issues and their implications for this policy and its implementation on an annual basis. For this item, the Head will report upon levels of child protection referrals made by the School during the past year, outlining the issues that have arisen and the outcome of any cases (while respecting confidentiality and not identifying persons by name), training undertaken by School staff and Governors and any changes in legislation or national/local guidance. This policy will be reviewed each year and updated as necessary. We will ensure that any deficiencies or weaknesses in Child Protection arrangements are remedied without delay once identified.

Signed by:



Mr David Miller, Chair of Governors



Mrs Sally-Anne Huang, Headmistress



Mrs Geraldine McAndrew,

Designated Safeguarding Lead Governor



Miss Rhona Muir,

Designated Safeguarding Lead

APPENDIX A – ADDITIONAL RELEVANT PUBLICATIONS

Disqualification Under the Child Care Act (2006)

Education and Inspections Act (2006)

Early Years Foundation Stage 2017 (Safeguarding and Welfare Requirements)

Education Act, Section 175 & 157 (2002)

Education Act (1996)

Every Child Matters (2003)

Equality and Human Rights Consultation (EHRC) guidance on prejudice based bullying

Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers July 2018

London Child Protection Procedures – reviewed every six months (online only)

‘Making barring referrals to the DBS’ (2017) and procedures DfE’s guidance

Munro Review of Child Protection (2011)

Sexual Violence and sexual harassment between children in schools and colleges, December 2017, updated May 2018

Singleton Report (2009)

and all guidance issued by the Secretary of State, the Safeguarding Children Board (LSCB) and the Southwark Safeguarding Children Partnership (SSCP)

United Nations Convention on the Rights of the Child (UNCRC)

APPENDIX B ADDITIONAL JAGS POLICIES AND GUIDANCE RELEVANT TO THE SAFEGUARDING (CHILD PROTECTION) POLICY

Attendance guidance and procedures policy

Anti-bullying Whole school policy

Behaviour Policy

Child Missing from School policy

Drugs, Alcohol and Illegal substances policy

Educational Visits;

Equal Opportunities

First Aid

Health and Safety Policy

Health and Safety for Outside Trips Policy
JAGS Safeguarding induction training
Medical Conditions Policy
Online Safety and IT guidelines for staff Overarching
Peer on Peer Abuse Policy
Pupil Welfare Risk assessment
Prevent Duty at JAGS.
Pupils IT online safety policy
PSCHE Policy
Recruitment Policy
Risk Assessment policy
School Welfare Policy
SEND Policy
Staff Code of Conduct
Supervision Policy
Visiting Speakers Policy
Whistleblowing Policy

GUIDANCE

Fabricated or induced illness
New staff induction;
Peripatetic teaching handbooks and guidance
Pupil Code of Conduct
Rewards and Sanctions;
Safeguarding on Day and residential Trips
Searching, Screening and Confiscation DfE advice January 2018
Transgender Guidance
UKCIS Education group's Advice for Schools
Use of Physical Force;
Well-Being Guidance and Strategy
Whole School Welfare Provision for pupils with SEND and EAL

APPENDIX C FROM KCSIE SEPTEMBER 2019

Designated Safeguarding Lead & DDSL Job description:

Governing bodies, proprietors and management committees should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead, this **lead responsibility** should not be delegated.

Managing referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support 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;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three 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 designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;

- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- 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 or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college 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;
- obtain access to resources and attend any relevant or refresher training courses; And Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- ensure the school or college's child protection policies are known, understood and used appropriately;

- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is 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 or college in this; and
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child protection file

Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.