



SAFEGUARDING (CHILD PROTECTION) POLICY

INTRODUCTION

This policy is applicable to all pupils in the school, including those in the EYFS.

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. The school is committed to providing a safe and secure environment for children (anyone under the age of 18, but including all Sixth Form students), staff and visitors and promoting a culture of openness, trust and transparency 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 mental or physical 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. The school always considers the best interests of the child.

This policy draws upon duties conferred by:

- the Children Acts 1989 and 2004
- The Education and Inspections Act 2006
- The Serious Crimes Act 2015
- The Children and Families Act 2014
- S157 and 175 of the 2002 Education Act
- The Education (Independent School Standards) Regulations 2014
- The Education and Training (Welfare of Children) Act 2021
- The Mental Capacity Act 2005
- The Care Act 2014
- the guidance contained in "[Working Together to Safeguard Children](#)" 2018
- the DfE's statutory guidance "[Keeping children safe in education](#)" (KCSIE) (September 2023)
- Ofsted Guidance and procedures produced by the London Safeguarding Children Partnership ([LSCP](#)) and the Southwark Safeguarding Children Partnership ([SSCP](#)).

We also have regard to the advice contained in DfE's "[What to do if you're worried a child is being abused](#)" and "[Information Sharing – Advice for practitioners](#)".

This policy has special regard to the following legislation, guidance and core publications:

- Children and Social Work Act 2017
- The DfE guidance, Preventing and Tackling Bullying (July 2017)

- Revised Prevent Duty Guidance: for England and Wales (April 2021) following the Counter-Terrorism and Security Act 2015;
- The Prevent duty: Departmental Advice for schools and childcare providers (2015);
- The use of social media for online radicalisation (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 Early Years Foundation Stage Statutory Framework (2021);
- Information Sharing – Advice for Practitioners providing safeguarding services to children, young people, parents and carers July 2018

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 of these environments. All staff, but especially the DSL and DDSLs will be considering whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. 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 those staff who work directly with children read at least Part One and Annex B and those staff who do not work directly with children read either Part One or Annex A (a condensed version of Part One) of the DfE guidance '*Keeping children safe in education*'. This will depend on the assessment of which guidance will be most effective for the staff to safeguard and promote the welfare of children. We will also ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One (or Annex A if appropriate) of the guidance. Due regard is paid to The Charity Commission ('the Commission'), the independent regulator of charities in England and Wales' advice, as [regulatory advice under section 15\(2\) of the Charities Act 2011](#) and to the [Automatic disqualification rule changes: guidance for charities](#). In addition, we will ensure that school leaders and staff who work directly with children also read Annex B of KCSIE.

When considering safeguarding issues, regard should also be given to related JAGS' School policies: Online Safety; Well-Being; Health and Safety; First Aid; Pupil Code of Conduct; Staff Code of Conduct; 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:

- Outline the role of the governing body
- Identify the names of responsible persons in the school and explain the purpose of their role

- 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 allegations against / concerns raised in relation to 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

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. The Governing Body will also ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our school are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated. The Governing Body are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements. Further information can be found at Human Rights | Equality and Human Rights Commission and Equality Act 2010: advice for schools.

Our governors recognise that whilst all children should be protected, some groups of children, such as children who need a social worker (Child in Need and Child Protection Plans); children who are absent from education; children requiring mental health support; looked after and previously looked after children; care leavers; children with special educational needs, disabilities or health issues, are potentially at greater risk of harm than others (both online and offline).

Our governors will do all that they reasonably can to limit children’s exposure to the risks from the school’s IT system. As part of this process, our governing body will ensure that the school has appropriate filters and monitoring systems in place and regularly review their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Our governing body will consider the age range of our children, the number of children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

In accordance with the DfE’s [filtering and monitoring standards](#), the Governing Body have assigned a senior leader (*Rhona Muir, DSL*) and a Governor (*Geraldine McAndrew, Safeguarding Governor*) to ensure that these standards are being met. We will identify and assign roles and responsibilities to manage filtering and monitoring systems; review filtering and monitoring provision at least annually; block harmful and inappropriate content without unreasonably impacting teaching and learning and have effective monitoring strategies in place that meet their safeguarding needs.

The Governing Body will ensure that the school contributes to inter-agency working in line with statutory guidance “[Working Together to Safeguard Children](#)” 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 Head.

The Governing Body has nominated Mrs Geraldine McAndrew, 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 (LADO) 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.

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, supply teachers, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead (DSL) or to a Deputy Designated Safeguarding Lead (DDSL). If staff have any concerns about a child’s welfare they should act on them immediately. If at any time there is a risk of immediate serious harm to a child, a referral should be made to children’s social care 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 JAGS Executive Team. 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. 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 CCG | 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 Safeguarding Children Partnership arrangements. Other Relevant Agencies include Probation Services, Community rehabilitation Services and CAF/CASS.

The JAGS Designated Safeguarding Lead (including for the EYFS) is:

Rhona Muir Rhona.Muir@jags.org.uk

The Deputy Designated Safeguarding Leads are:

Paul O'Dwyer Paul.Odwyer@jags.org.uk

Anna Jones Anna.Jones@jags.org.uk

Kerri-Anne Bannon (James Allen's Junior School) kerri-anne.bannon@jags.org.uk

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

The Designated Safeguarding Lead (DSL) and DDSLs are members of the school's leadership teams. The DSL is a senior member of the school's leadership team, takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) and works with the mental health leads where safeguarding concerns are linked to mental health, 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. The DSL has a significant level of responsibility and our governing body will provide the DSL additional time, funding, training, resources, and support needed to carry out the role effectively. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL, this lead responsibility should not be delegated. During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns, which may include availability via phone and/or other media in exceptional circumstances.

The DSL is responsible for ensuring that filtering and monitoring systems and processes for the School's IT systems are in place and updated in accordance with the latest DfE guidance.

The DSL is the first point of contact for external agencies that are pursuing Child Protection investigations and coordinates the School's representation at CP conferences and Core Group meetings (including the submission of written reports for conferences). When an individual concern/incident is brought to the notice of the Designated Safeguarding Lead, they will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue. Where there is any doubt as to the seriousness of this concern, or disagreement between the Designated Safeguarding Lead and the member of staff reporting the concern, advice will be sought from the Deputy Designated Safeguarding Lead (DDSL) or the LA's Strategic Lead Officer for safeguarding in education services. If a child is in immediate danger or is at risk of harm, a referral will be made to Southwark Multi Agency Safeguarding Hub ([MASH](#)) (or its equivalent in another LA if the child resides in a different LA) and/or the police immediately.

The DSL will exercise their duty to challenge the actions or decisions of Children's Social Care or any other partner agency, in accordance with the Southwark Safeguarding Children Partnership (SSCP) [local escalation procedures](#) (or relevant LSCP's escalation procedures if the child resides in a different LA), where it is believed that an individual professional or agency might not be acting in the best interest of the child concerned.

All our staff will be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or may be being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

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 school leadership teams 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.

If pupils share their concerns or disclose information about abuse to a member of staff, the staff member will listen and respond sensitively. Confidentiality should not be promised, and the pupil should not be asked any leading questions. Training in responding to disclosures is included in staff induction.

The DSL is also aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - Police and Criminal Evidence Act (PACE) Code C 2019.

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms

of domestic abuse. 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:

MENTAL HEALTH

We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse

childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on [Mental Health and Behaviour in Schools](#).

CHILD CRIMINAL EXPLOITATION (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are: children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who are regularly absent from school or education or do not take part in education. Any possible CCE case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

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; being regularly absent from 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. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

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 Safeguarding Children Procedures](#). This will determine how and when information will be shared with parents and the investigating agencies.

Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. Sharing nudes and semi-nudes covers the incidents where:

- A person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- A person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- A person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

When such an incident involving nudes and semi-nudes 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 nudes and semi-nudes is available in the non-statutory guidance produced by the UK Council for Internet Safety (UKCIS) '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)'. We also note the DfE's [Searching Screening and Confiscation Advice](#) for schools.

SERIOUS VIOLENCE

All staff will be made aware of indicators, which may signal that children are at risk from, or are involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or 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 and may be at risk of criminal exploitation. We are aware that there is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents [Advice to schools and colleges on gangs and youth violence](#) and [Criminal exploitation of children and vulnerable adults: county lines](#).

COUNTY LINES

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations

including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: go missing and are subsequently found in areas away from their home; have been the victim or perpetrator of serious violence (e.g. knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a 'traphouse or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters; have their bank accounts used to facilitate drug dealing.

CHILD ON CHILD ABUSE

Please see Appendix D for further detail.

Children are capable of abusing other children. This can happen both inside and outside of school and online, and is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children;
- Physical abuse, such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, which may include an online element that facilitates, threatens and/or encourages physical abuse;
- Violence, particularly pre-planned;
- Forcing other children to use drugs and alcohol;
- Emotional abuse (blackmail or extortion, threats and intimidation);
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery) which may be standalones or part of a broader pattern of abuse;
- Sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting)
- Sexual exploitation (causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party, having an older boyfriend / girlfriend, associating with known adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts)
- 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;
- Initiation/hazing type violence and rituals

Although it is more likely that girls will be victims and boys, perpetrators, all child on child 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 has a zero tolerance approach to child on child abuse. 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.

Following the recommendations in Ofsted’s *Review of sexual abuse in schools and colleges*, the school assumes that, even if there are no reported cases of child on child abuse, such abuse is still taking place and is simply not being reported.

Any possible child on child 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 child on child 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 Appendix D.

BULLYING

Please see JAGS Anti-bullying Policy for further detail

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 child on child 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. It is important that all our staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. Any possible child on child abuse case must be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. We also note the DfE’s advice and guidance on [Preventing and Tackling Bullying](#).

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 Children and Young People’s Mental Health Services (CYPMHS) or a School Counsellor. 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 on the grounds of 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 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 nature or there are fears of radicalisation, this should be reported directly to the Designated Safeguarding Lead or Deputies in their absence.

SEXUAL HARASSMENT, ONLINE SEXUAL ABUSE AND SEXUAL VIOLENCE

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable in our school and we have appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence are happening in and around the school, even when there are no specific reports. We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-school approach that includes an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent. We will ensure that children are taught about safeguarding risks, including online risks and will support pupils to understand what constitutes a healthy relationship, both online and offline. Our staff members have been made aware and have appropriate knowledge of 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "[Keeping children safe in education](#)". All pupils are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure pupils are confident that this is the case. We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls and LGBT children). We will identify and address any barriers that can prevent a pupil from making a disclosure, for example communication needs. 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. 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. We will keep comprehensive records of all allegations.

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. We will handle reports of sexual violence and harassment between children, both on and outside school premises, in accordance with 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "[Keeping children safe in education](#)" and train our staff members accordingly (including teachers delivering relationships, sex and health education). 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.

On one hand, we need to safeguard the victim (and the wider pupil/student body) and on the other hand, where appropriate, provide the alleged perpetrator with an education, safeguarding support and implement any disciplinary sanctions. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

Further information is available in '*Part 5: Child on child sexual violence and sexual harassment*' of DfE guidance "[Keeping children safe in education](#)"

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 behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. We consider HSB in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. We aim to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding. HSB can, in some cases, progress on a continuum. Addressing

inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. We will work with appropriate agencies to address HSB and to support children displaying HSB.

Children who are lesbian, gay, bi, or trans (LGBT)

We note that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum. We will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to LGBT children.

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 the most up to date version of Keeping Children Safe in Education. Staff will be trained in how to respond to these disclosures. 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 Sexual Harassment between children in schools and colleges' will be followed closely at all times as referenced in KCSIE. 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 all 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.

DOMESTIC ABUSE

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a

child may blame themselves for the abuse or may have had to leave the family home as a result. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. Information is available about [Domestic abuse and how to get help in Southwark](#).

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](#).

SO-CALLED ‘HONOUR-BASED’ ABUSE (HBA) (including Female Genital Mutilation and Forced Marriage)

HBA 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 HBA 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 HBA or who has suffered from HBA, they will share it immediately with the DSL with a view to referring to appropriate agencies.

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 prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.

FGM is illegal in the UK. It is estimated that approximately 60,000 girls aged 0-14 were born in England and Wales to mothers who had undergone FGM and approximately 103,000 women aged 15-49 and approximately 24,000 women aged 50 and over who have migrated to England and Wales are living with the consequences of FGM. In addition, approximately 10,000 girls aged under 15 who have migrated to England and Wales are likely to have undergone FGM. 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.

FORCED MARRIAGE

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We note The Forced Marriage Unit's statutory guidance: *The right to choose: government guidance on forced marriage* and especially Chapter 7 on page 32 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

In line with the advice contained in the multi-agency practice guidelines, 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: fmufco.gov.uk

We note that, in addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

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 Schools 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.

Examples of the ways in which people can be vulnerable to radicalisation and the indicators that might suggest that an individual might be vulnerable:

- 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. We see the Prevent duty as part of our school's wider safeguarding obligations and note the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76.

Channel is a voluntary, confidential support 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. The individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school will attend the Channel panel if and when we are asked to help with this assessment.

For further detail, please refer to the school's Prevent Policy.

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 the local authority 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 also be obtained by contacting [MASH](#). In the case of a non-Southwark child, we will notify the relevant LA.

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 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 [Referral Form](#) and copied to the LA's Schools Safeguarding Coordinator. Prior to any written form 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 Abuse, 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. Southwark's [Family Early Help Service](#) Duty number is **020 7525 1922**, which will give four options:

- General enquiries and signposting

- Family Early Help Duty Manager for general advice including consultations around potential and new referrals and current casework
- Education, Inclusion and Attendance support and advice including all enforcement activity
- Parenting support and advice and information on parenting course and group work programmes

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 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 (including 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.

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](#). Where a child has an allocated social worker, we will liaise with the virtual school head who, in addition to their statutory duties, now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. We also note the DfE's non-statutory guidance on promoting the education of children with a social worker that contains further information on the roles and responsibilities of virtual school heads.

Local authorities should share with our school/setting the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or being absent from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

We acknowledge that children with special educational needs or disabilities (SEND) or certain health conditions 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 condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges. Further information can be found in the DfE's [SEND Code of Practice 0 to 25](#) and [Supporting Pupils at School with Medical Conditions](#).

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/family's 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.

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, including the Head, will receive appropriate safeguarding and child protection training (including online safety, which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction 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, including the Head, 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 safety 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)
- Staff Code of Conduct including acceptable use of IT, staff/pupil relationships and communications using social media
- KCSIE Part one (all staff)
- KCSIE Annex B (leaders and those who work directly with children)
- Mental Health Policy
- Online Safety Policy
- Promoting Positive Behaviour Policy
- Wellbeing Guidance and Strategy
- Whistle Blowing Policy

All staff are required to read at least Part 1 of KCSIE and those in direct regulated contact with children must read Annex B. A questionnaire is completed to ensure understanding and where appropriate, a translation into the target language will be made available. All staff and governors must also read this policy and the Staff Code of Conduct.

The Designated Safeguarding Lead (and their Deputies) will attend the LA's dedicated or another appropriate 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.

Volunteers undergo safeguarding training and briefings.

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. As part of the shortlisting process we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we may explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence 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](#)". 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](#)”, 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 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 accordance with staffing regulations.

This School will only use employment agencies which can demonstrate that they positively vet their supply staff. Any alleged misconduct of temporary or agency staff will be reported to the employer concerned and to the LA’s Designated Officer (LADO). Staff joining the School on a permanent or temporary basis will be given a copy of this policy. Additionally, the Staff Handbook issued to all staff confirms how to access the school’s safeguarding procedures, the Staff Code of Conduct and the allegations against staff procedures.

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. 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. Please refer to the School’s Visiting Speakers’ Guidance. Under no circumstances will a visitor in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

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](#)".

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

Voluntary and third 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.

If it comes to our attention that an allegation or complaint of mistreatment has been made against an employee or volunteer of such an organisation, this will be reported by the School to the Local Authority's Designated Officer (LADO).

Where services or activities are provided separately by another body we will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with our school on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

We note the DfE's [non-statutory guidance for providers running out-of-school settings](#).

CHILDREN STAYING WITH HOST FAMILIES

This guidance has been removed as JAGS no longer engages in trips of this type.

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. All pupils and their parents are also provided with a handbook outlining what to do in the event of any concerns.

STAFF CODE OF CONDUCT

All staff (paid and voluntary) are expected to adhere to the **Staff Code of Conduct (See separate document)** 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. We will endeavour to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

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'* and the school policy. '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 SEND 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, for example, during musical instrument tuition or confidential counselling sessions, 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 be alert to behaviours that may cause 'low-level' concerns such as being over friendly with children, having favourites, taking photographs of children on their mobile phone contrary to school policy, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, humiliating pupils (see below about what a 'low-level' concern is and how to share these concerns).

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 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 the DSL. 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 the DSL if the Head is not available. Nothing should be said to the colleague involved. The concern should be shared with the Chair of Governors if it relates to the Head. All members of staff (paid and voluntary) should adhere to the **Low Level Concerns** guidance (see later in this document and in the Staff Code of Conduct) which addresses concerns that do not meet the mandatory threshold for reporting to the local authority. These could be concerns about their own or a colleague's behaviour.

We note the non-statutory Guidance for Safer Working Practice for professionals working in education settings published by the Safer Recruitment Consortium.

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 engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required. Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances will we allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity relating to children. We will determine the appropriate level of supervision depending on the circumstances. If an individual working at our school is self-employed and requires a DBS, we will consider obtaining the DBS check via the school, as self-employed people are not able to make an application directly to the DBS on their own account.

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 this 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.

SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

JAGS takes seriously all safeguarding concerns or allegations against those working in or on behalf of our school in a paid or unpaid capacity. We will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately. 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, and including supply teachers, volunteers and

contractors. All such allegations and concerns will be brought immediately to the attention of the Head, and nothing should be said to the colleague involved. In the absence of the Head, the DSL should be informed and would immediately contact the Chair of Governors or the Safeguarding Governor. In cases where the Head is the subject of the allegation or concern, they will be reported to the Chair of Governors, in order that they may activate the appropriate procedures. The matter will not be discussed with the Head if they are the subject of the allegation. 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. In the event of an allegation against a member of supply staff, the supply agency must be kept fully informed and involved.

There may be two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – known as 'low level concerns'.

Allegations that may meet the harms threshold

These procedures are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school and will be used in respect of all cases in which it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/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; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

The Local Authority's Designated Officer(s) (LADO) should be informed of all such allegations that come to a school's attention and appear to meet the above criteria. Any allegations should be reported immediately and within one working day. Contact can also be made with LA's Schools Safeguarding Coordinator who will liaise with the LADO. Where we identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, we will contact the Southwark Multi Agency Safeguarding Hub ([MASH](#)) (or its equivalent in another LA if the child resides in a different LA) and/or the police immediately as per the referral process contained in this policy.

When dealing with allegations, we will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the child and support the person subject to the allegation.

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 LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and London Safeguarding Children Partnership ([LSCP](#)) 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 when an individual is removed from regulated activity (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to

children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. The DBS will consider whether to bar the person. Referrals will be made as soon as possible when an individual is removed from regulated activity. Where we dismiss or cease to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State, as required by law. 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 individuals who are still subject to disciplinary sanctions which were imposed by the GTCE prior to its abolition in 2012. 'KCSIE 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.

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.

Concerns that do not meet the harms threshold – known as 'low level concerns'

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. **However, as a good practice, we will contact the LADO for consultation to ensure that we follow the appropriate and correct procedures even when the concern seems to be 'low-level'.**

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

All 'low-level' concerns will be brought immediately to the attention of the Head or the DSL and nothing should be said to the colleague involved. In cases where the Head is the subject of the concern, they will be reported to the Chair of Governors or Safeguarding Governor, and nothing should be said to the Head.

Further information about how the school responds to Low Level Concerns is included in the Staff Code of Conduct. The full statutory procedures, including timescales about dealing with allegations of abuse made against / concerns

raised in relation to teachers and other staff can be found in Part Four of the DfE guidance “Keeping Children Safe in Education”.

The Chair of Governors is: Mrs Jane Marshall

The Safeguarding Governor is: Mrs Geraldine McAndrew

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

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 – Tel: 020 7525 0689; Mob: 07943076608; Email: Eva.Simcock@southwark.gov.uk. The LADO can also be contacted via Qau.Safeguarding@southwark.gov.uk.

There is also a duty system and one of the CP Coordinators in Quality Assurance Unit is on duty each day to deal with LADO issues when LADO is unavailable. The 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 Children’s Services Alasdair Smith 020 7525 0654

The LA’s Schools Safeguarding Coordinator is: Apo ÇAĞIRICI 020 7525 2715 Apo.Cagirici@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

Brief and accurate written notes will be kept of all incidents and child protection or child in need concerns, discussions and decisions made, and the reasons for those decisions, relating to individual pupils. These notes are 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 and these will be kept as Child Protection 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 Child Protection records are kept securely by the Designated Safeguarding Lead and separately from educational records, using CPOMS. They may only be accessed by the Designated Safeguarding Lead, their Deputies 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 as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term ensuring secure transit and a confirmation of receipt will be obtained.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. 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.

When we receive child protection records from other schools, we will ensure key staff such as the DSL and SENDCO 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 the child's new school. If the parent/carer fails to provide this information, an urgent referral will be made to the Family Early Help Service either through the School's Single Point of Contact (SPOC) / SPOC FEH Team 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 promptly to the sending school with a note, advising them to refer to their LA's Children's Services Department. **A child's name will only be removed from the School's Admissions Register in accordance with the DfE guidance [Working together to improve school attendance](#).**

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 accordance 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 school's 'Missing Child Policy'.

Action to be followed by staff if a child fails to attend the first day of school

All new pupils are placed on the School's admission register at the beginning of the first day on which the School has agreed that the pupil will attend the School. If a child fails to attend on the agreed date, staff must inform the

Designated Safeguarding Lead or her Deputies in her absence. The Designated Safeguarding Lead will consider notifying the local authority at the earliest opportunity.

Where there are changes affecting the child (including a change of address or school), these will be reflected in the admission register. This will assist the School and external agencies when making enquiries to locate any missing children.

Duty to report

The school monitors attendance closely and will take action to address poor or irregular attendance. Registers are taken at 8.40am in the Pre-Prep, 8.25 in the Junior School and 8.30 in the Senior School. If a child is absent at registration, and no information about that absence has been received from a parent or other responsible adult, the school will contact parents and the emergency contacts given to the school. If no contact can be made, the school would contact Southwark Children's Social Care for further advice.

The school will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more without permission.

Where a pupil has been continuously absent without authorisation for a period of not less than 20 school days (and there are no reasonable grounds to believe the pupil is unwell or unable to attend because of any unavoidable cause), and the school and local authority have failed, following reasonable enquiry, to ascertain where the pupil is, the school may delete the pupil's name from the admission register. The school will inform the local authority of such deletion no later than the time at which the pupil's name is deleted from the register.

The school also recognises its wider reporting duties following deletions from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006, to help identify children who are missing education and/or otherwise at risk of harm. The school has regard to the guidance in *School Attendance 2022* and *Children Missing Education 2016*.

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 Southwark's [Children Missing Education \(CME\) Protocol](#).

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. We will hold more than one emergency contact number for each pupil or student to allow us 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.

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.

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. Our Head will use their professional judgement about the need to escort or supervise visitors such as children's relatives or other visitors attending a sports day. In the case of individuals visiting the school in a professional capacity e.g. educational psychologists, social workers etc., we will check their ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). They 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. Further detail is available in the school's Photography and Recording Images Policy.

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 – a proactive monitoring service and email / web filter. Both are provided by Smoothwall. 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 / 5G when using devices in lessons. Any 'flagged' incidents are immediately acted upon and records kept. Such 'flags' are an important part of our regular PSHCE and online reviews.

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 be aware of sexual harassment, online abuse, sexual violence and issues of consent and safeguarding risks, including online risks and what constitutes a healthy relationship, both online and offline via a carefully planned relationships, sex and health education curriculum;
- 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 accordance with our Online Safety Policy, which, amongst other things, will include appropriate filtering and monitoring on school devices and school networks. 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.

REMOTE EDUCATION

We understand the importance of keeping pupils, students and staff safe whilst learning remotely. We will reinforce in our contacts with parents and carers the importance of children being safe online. Parents and carers are likely to find it helpful to understand what systems our school uses to filter and monitor online use. It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they are asked to access and be clear who from our school (if anyone) their child is going to be interacting with online. We also note the DfE guidance Safeguarding and remote education.

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 violence in relationships between young people, 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. Any matters of concern arising from the discursive nature of PSHCE lessons are followed up appropriately following safeguarding and child protection procedures.

HEALTHY SCHOOLS LONDON and WELLBEING FIRST: IMPROVING MENTAL HEALTH AND RESILIENCE IN SCHOOLS (IMHARS) PROGRAMME

JAGS will work with partners to promote a whole healthy school approach and achieving the “Healthy School London” status as well as access the local “Improving Mental Health and Resilience in Schools (IMHARS) Programme” – including a focus on the curriculum as part of personal development with the aim of:

- “Closing the gaps” over time, through using the full capacity and flexibility of the curriculum to help pupils to be safe, confident, healthy, happy and active citizens;
- Developing a school ethos, culture and environment as well as provision for spiritual, moral, social and cultural (SMSC) education that encourage a safe and healthy lifestyle for all children and young people, including the most disadvantaged and vulnerable;
- Delivering the new mandatory Relationships & Sex Education (RSE) and Health Education (HE) and/or where delivered, through Personal, Social, Health and Economic (PSHE) & Wellbeing Education – including specifically consent, sexual harassment and sexual violence, including online;
- Providing high quality Physical Education (PE) and sport to promote physical activity;
- Promoting an understanding of the full range of issues, attitudes and behaviours which impact upon lifelong health and wellbeing, including emotional wellbeing, mental health and safety;
- Working in partnerships with parents/carers, local communities, external agencies and volunteers to support the wellbeing, health and personal development of all pupils including the most vulnerable and disadvantaged, “closing the gaps” over time.
- Ensuring that food and drink available across the school day reinforce the healthy lifestyle message;

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 share the LA’s leaflet for parents, “*Protecting Children in Education Settings*’ via our school website.
- 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:

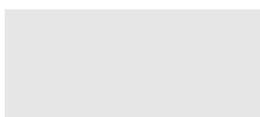
- the extent to which a positive culture and ethos is created where safeguarding is an important part of everyday life in the school, backed up by training at every level
- the content, application and effectiveness of safeguarding policies and procedures, and safer recruitment and vetting processes
- 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 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:



Mrs Jane Marshall, Chair of Governors



Mrs Alex Hutchinson, 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 2021 (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 Safeguarding Children 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)

Relationships Education, Relationships and Sex Education (RSE) and Health Education (2019, updated 2021)

Review of sexual abuse in schools and colleges (2021), Ofsted

Sexual Violence and sexual harassment between children in schools and colleges, September 2021

Singleton Report (2009)

and all guidance issued by the Secretary of State 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

Promoting Positive Behaviour 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

Missing Child Policy

Online Safety Policy and IT guidelines for staff

Pupil Welfare Risk assessment

Prevent Duty at JAGS

Pupils IT online safety policy

PSHCE Policy

Recruitment Policy

Risk Assessment policy

School Welfare Policy

SEND Policy

Staff Code of Conduct

Supervision Policy

Use of Reasonable Force Policy

Whistleblowing Policy

GUIDANCE

Owner: Designated Safeguarding Lead
Safeguarding (Child Protection) Policy updated August 2023
Next review: September 2024 or earlier in response to changes to legislation

Fabricated or induced illness

New staff induction

VMT teaching handbooks and guidance

Pupil Code of Conduct

Safeguarding on Day and Residential Trips

Searching, Screening and Confiscation DfE advice 2022

UKCIS Education group's Advice for Schools

Visiting Speakers Guidance

Well-Being Guidance and Strategy

Whole School Welfare Provision for pupils with SEND and EAL

Annex C: Role of the designated safeguarding lead

Governing bodies and proprietors 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 and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing 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.

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 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.

Manage referrals

The designated safeguarding lead is expected to refer cases:

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

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co-ordinators (SENCO), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health

- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college¹⁵⁵. This includes:
 - ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records **should** include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

¹⁵⁵ We recognise that in some settings there may be a different strategic lead for promoting the educational outcomes of children who have or have had a social worker, particularly in larger schools or colleges. Where this is the case, it is important that the DSL works closely with the lead to provide strategic oversight for the outcomes of these children and young people.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the school's 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 know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing information about welfare, safeguarding, and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership

staff.

Training, knowledge and skills

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 (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements¹⁵⁶
- 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
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers¹⁵⁷
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school or college with regards to the requirements of

¹⁵⁶ Full details in Chapter one of [Working Together to Safeguard Children](#).

¹⁵⁷ 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.

the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation

- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses, and
- 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.

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, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and

-
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

APPENDIX D: ADDITIONAL INFORMATION ABOUT CHILD ON CHILD ABUSE

Taken from the previous Child on child Abuse Policy. The Safeguarding Team hold further information and guidance.

I. A Whole School Approach

School Environment

The School actively seeks to raise awareness of and prevent all forms of child on child abuse by:

- Educating all governors, its senior leadership team, staff, students, and parents about this issue. This includes: training all governors, the senior leadership team, and staff on the nature, prevalence and effect of child on child abuse, and how to prevent, identify, and respond to it. This includes:
 - Contextual Safeguarding,
 - the identification and classification of specific behaviours, including digital behaviours,
 - the importance of taking seriously all forms of child on child abuse (no matter how 'low level' they may appear) and ensuring that no form of peer-on peer abuse is ever dismissed as horseplay or teasing.
- social media and online safety, including how to encourage children to use social media in a positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online.
- Educating children about the nature and prevalence of child on child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via PSHCE and the wider curriculum. For example, by addressing gender inequality in a statistics class, or by reviewing literature in an English class which addresses bullying and its effect on mental health. Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of child on child abuse. Educating students about consent includes teaching them basic facts such as;
 - a child under the age of 13 can never consent to any sexual activity;
 - the age of consent is 16; and
 - sexual intercourse without consent is rape, and

engaging parents on these issues by;

- talking about them with parents, both in parent talks and one to one,
 - asking parents what they perceive to be the risks facing their child,
 - involving parents in the review of School policies and lesson plans, and encouraging parents to hold the School to account on this issue, in part as a result of visibility of this policy.
- Supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school counselling and therapy to address underlying mental health needs.

These interventions can be 'de-clinicalised' and brokered through a positive relationship with the School and its staff. All staff are trained to meet low-level mental health difficulties within the students.

- Working with governors, senior leadership team, and all staff, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community.
- Creating conditions in which our students can aspire to, and realise, safe and healthy relationships fostering a whole-school culture;
 - which is founded on the idea that every member of our School community is responsible for building and maintaining safe and positive relationships, and helping to create a safe School environment in which violence and abuse are never acceptable, and in which certain behaviour such as the carrying of weapons is not tolerated;
 - in which students are able to develop trusting relationships with staff, and in which staff understand, through regular discussion and training, the importance of these relationships in providing students with a sense of belonging, which could otherwise be sought in problematic contexts;
 - in which students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to;
 - which (i) proactively identifies positive qualities in students; (ii) nurtures these qualities; (iii) teaches and encourages students to think about positive hopes for the future; and (vi) supports students in developing small-scale goals that enable realistic ambitions, and
 - which provides supervised activities to students that give them the experience of having their needs met that might otherwise apparently be met in abusive circumstances. These can include experiencing (i) status; (ii) excitement; and (iii) a degree of risk;
 - responding to cases of child on child abuse promptly and appropriately;
 - ensuring that all child on child abuse issues are fed back to the School's safeguarding team of the Designated Lead/Deputy Designated Leads so that they can spot and address any concerning trends and identify students who may be in need of additional support. Concerns are shared by one to one discussions and then recorded on CPOMS. CPOMS entries are discussed once a week by the safeguarding leads and concerns about students (including child on child abuse issues) are relayed to staff where appropriate;
 - challenging the attitudes that underlie such abuse (both inside and outside the classroom).

Reporting Concerns

Pupils are made aware of safeguarding protocols and confidentiality is never promised. Pupils have a number of ways that they can contact a member of staff if they have any concerns about their welfare or that of others. These include post boxes where they may place anonymous or named notes, email addresses (all pastoral staff

contacts are advertised around the school, along with photographs of named members of staff), Head Girls' email addresses and post boxes are also available. Pupils can privately contact a member of staff through Microsoft Teams where there is also a Help and Support Channel for each year group which outlines support in school, as well as signposting details of support outside of school. This information is also displayed around the school.

Multi-Agency Working

The School actively engages with its Local Safeguarding Partnership in relation to peer-on peer abuse, and works closely with, for example, children's social care, the police, Southwark MASH and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, and other schools.

The relationships the School has built with these partners are essential to ensuring that the School is able to prevent, identify early, and appropriately handle cases of child on child abuse. They help the School to: (a) develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist; (b) ensure that its students are able to access the range of services and support they need quickly; (c) support and help inform the School's local community's response to child on child abuse; (d) increase the School's awareness and understanding of any concerning trends and emerging risks in its local area to enable it to take preventative action to minimise the risk of these being experienced by its students.

The School actively refers concerns and allegations of child on child abuse where necessary to children's social care, the police, Southwark MASH (or the MASH team of the student's home address), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures. This is particularly important because child on child abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the alleged incident cannot appropriately be managed internally by the School itself) to try to address the issue alone – it requires effective partnership working.

II. Responding to Concerns or Allegations of Child on child Abuse

General Principles

It is essential that all concerns and allegations of child on child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our School environment.

Any response should;

- include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation;
- treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. The School should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter and take into account that the abuse may indicate wider

safeguarding concerns for any of the children involved, and consider and address the effect of wider sociocultural contexts – such as the child's/ children's peer group (both within and outside the School); family; the School environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence.

- Consider what changes may need to be made to these contexts to address the child/ children's needs and to mitigate risk, and the potential complexity of child on child abuse and of children's experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;
- the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL will discuss the proposed action with the child/ children and their parents, and obtain consent to any referral before it is made. The School will manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. It is particularly important to take into account the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL or DDSL without delay (in accordance with the School's Safeguarding (Child Protection Policy)) so that a course of action can be agreed.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately.

Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made (in accordance with the School's Safeguarding (child protection policy)).

If a child speaks to a member of staff about peer-on peer abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement.

How will the School respond to concerns or allegations of child on child abuse?

The DSL will discuss the concern(s) or allegation(s) with the member of staff who has reported it/them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected, informing the Deputy Head, Pastoral and Headmistress of their actions.

Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the DSL should consider what urgent action can be taken in addition to the actions and referral duties set out in this policy, and in the School's Safeguarding (Child Protection Policy), to seek specialist help in preventing the images spreading further and removing the images from the internet.

The Internet Watch Foundation (IWF), for example, has a trained team that can evaluate and remove illegal images from the internet when the images are reported to them quickly. They will also share the image with the National Crime Agency's CEOP Command to facilitate an investigation. Any report to IWF will be made in consultation with the police.

DSLs should always use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour, and (b) determine whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required.

In borderline cases the DSL may wish to consult with children's social care and/or Southwark MASH (or the MASH team of the child's home LA), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures) on a no-names basis (where possible) to determine the most appropriate response.

Where the DSL considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL will

contact children's social care and/or the police immediately and, in any event, within 24 hours of the DSL becoming aware of the alleged behaviour. The DSL will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:

- A. Manage internally with help from external specialists where appropriate and possible. Where the alleged behaviour between peers is abusive or violent (as opposed to inappropriate or problematic – unless as stated above), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the School may need to handle concerns or allegations internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).
- B. Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of the child/children and their family. These services may, for example, include family and parenting programmes, responses to emerging thematic concerns in extra familial contexts, a specialist harmful sexual behaviour team, CYPMHS and/or youth offending services.
- C. Refer the child/children to children's social care for a section 17/47 statutory assessment. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, a report to the police) is made immediately. This referral will be made to children's social care in the area where the/each child lives. Depending on the safeguarding procedures issued by the Local Safeguarding Partnership in that area, there will normally be an initial review and assessment of the referral, in accordance with that area's assessment framework. As a matter of best practice, if an incident of child on child abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the/each child who has experienced the abuse, and the/each child who was responsible for it, and the contexts to which the abuse was associated.
- D. Report alleged criminal behaviour to the police. Alleged criminal behaviour will ordinarily be reported to the police. However, there are some circumstances where it may not be appropriate to report such behaviour to the police. For example, where the exchange of youth involved sexual imagery does not involve any aggravating factors. All concerns or allegations will be assessed on a case by case basis, and in light of wider context.

Risk Assessment & Safety Plan

The School will always carry out a risk assessment and devise a safety plan in respect of:

- Any child who is alleged to have behaved in a way that is considered to be abusive or violent;
- any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child, or
- any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL.

Where it is alleged that a child has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the DSL will use their professional judgment – based on the particular concern(s) and/or allegation(s) raised, and the needs and circumstances of the individual child/children in question – to determine whether (as explained above) it would be appropriate to contact children’s social care, and to carry out a safety plan.

Careful judgment and consideration are required as to whether alleged behaviour which might be judged to be inappropriate by an adult might actually be harmful to another child. Consultation is recommended with children’s social care if there is any doubt about this. Careful consideration should also be given to a range of factors, including the context, severity of the alleged behaviour, impact of the alleged behaviour on others, risk to others, and whether there are any patterns of behaviour occurring.

Where other children have been identified as witnesses to alleged abuse or violence, consideration should also be given by the DSL to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.

Information Sharing, Data Protection and Record Keeping

When responding to concern(s) or allegation(s) of child on child abuse, the School will:

- Always consider carefully, in consultation with children’s social care, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other students and individuals;
- record the information that is necessary for the School and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved;
- keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose, and
- be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in Working Together to Safeguard Children (February 2019) and the HM Government advice on Information Sharing (updated in July 2018).

Disciplinary Action

The School will consider whether disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, it is critical that the School works in partnership with the police and/or children's social care.

Where a matter is not of interest to the police and/ or children's social care, the School may still need to consider what is the most appropriate action to take to ensure positive behaviour management. Disciplinary action may sometimes be appropriate, including to:

- Ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
- demonstrate to the child/children and others that child on child abuse can never be tolerated; and
- ensure the safety and wellbeing of other children.

However, these considerations must be balanced against any police investigations, the child's/children's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns. Before deciding on appropriate action, the School will always consider its duty to safeguard all children in its care from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child on child abuse and the causes of it.

The School will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. For example, action may still need to be taken by the School in relation to other students who have been involved with and/or affected by child on child abuse. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the School. Engaging in Fair Access Panel Processes to assist with decision making associated to managed moves and exclusions can also be beneficial. In the event of any managed move, consideration must be given to sharing information with the receiving school regarding the child on child abuse in order to allow best protection of children in the new school.

Disciplinary interventions alone are rarely able to solve issues of child on child abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forward, as set out above and below. Reintegration into the school community will be carefully managed for both the abused and the abuser.

On-Going Proactive Work for a Whole-School Community Contextual Safeguarding Approach

The School's response to concerns or allegations of child on child abuse is part of ongoing proactive work by the School to embed best practice and in taking a whole-school community Contextual Safeguarding approach (defined above) to such abuse. As such the School's response can become part of its wider prevention work.

This response may involve the School working with the local authority to undertake, for example, a Contextual Safeguarding school assessment which would fit into a systems approach to Contextual Safeguarding. The response could also include the School asking itself a series of questions about the context in which an incident of child on

child abuse occurred in the School, the local community in which the School is based, and the wider physical and online environment – such as:

- What protective factors and influences exist within the School (such as positive peer influences, examples where child on child abuse has been challenged, etc.) and how can the School bolster these?
- How (if at all) did the School's physical environment or the students' routes to and from the School contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision, or by working with local safeguarding partners to mitigate the risks to students' safety whilst travelling to and from the School?
- How (if at all) did the online environment contribute to the abuse, and how can the School address this going forwards, for example by strengthening the way in which the School encourages positive and safe use of the internet by students?
- Did wider gender norms, equality issues, and/or societal attitudes contribute to the abuse?
- What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forward?
- Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse, or to address any victim blaming narratives from staff?
- How have similar cases been managed in the past and what effect has this had?
- Does the case or any identified trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or prevent child on child abuse, including by way of the School's PSHCE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work, respect, boundaries, consent, children's rights and critical thinking and/or avoiding victim-blaming narratives?
- Are there any lessons to be learnt about the way in which the School engages with parents to address child on child abuse issues?
- Are there underlying issues that affect other schools in the area and is there a need for a multiagency response?
- Does this case highlight a need to work with certain children to build their confidence, and teach them how to identify and manage abusive behaviour?
- Were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the School?

Answers to these questions can be developed into an action plan that is reviewed on a regular basis by the School's leadership.