Naima JPS

Safeguarding & Child Protection Policy

Last review:	September 2026
Next review:	September 2027
Signed off by Designated Safeguarding Lead :	Gemma Babani
Signed off by The Chair of Governors:	Julian Levy
Signed off by Head:	Bill Pratt

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SAFEGUARDING & CHILD PROTECTION POLICY

Policy statement and principles

At Naima JPS, we maintain an attitude of "it could happen here" where safeguarding is concerned. The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school and to inform parents and guardians how we will safeguard their children whilst they are in our care. We will always put the best interests of each and every child in our care first and foremost.

This policy is one of a series in the school's integrated safeguarding portfolio, which includes our Staff Code of Conduct, Safer Recruitment Policy, Allegations of Abuse Against Staff Policy, Complaints Policy, Promoting Positive Behaviour Policy, Restrictive Intervention, Anti-Bullying Policy and Online Safety Policy.

This policy is available on the Naima JPS school website and school app and is included in the staff handbook.

Our core safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of children is of paramount importance
- safer children make more successful learners
- A school that promotes an inclusive, anti-discriminatory culture
- representatives of the whole-school community of pupils, parents, staff and governors will be involved in policy development and review
- this policy will be reviewed **at least annually** and will be updated whenever needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.

Child protection statement

At Naima JPS, we recognise that the welfare of the child is paramount, as enshrined in the Children Act 1989. We believe that all children, regardless of age, disability, gender, racial heritage, religious belief or sexual identify, have a right to equal protection from all types of harm or abuse. We understand that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

We are committed towards working in partnership with children, their parents and other agencies, and recognise that this cooperation is essential in promoting the welfare of children. We endeavour to provide a safe and welcoming environment where children are respected, valued and listened to, and we routinely consider the best interests of each and every child in our care. We are alert to the signs of abuse, neglect, exploitation and modern slavery and follow our clearly outlined procedures to ensure that children receive

effective support, protection and justice. We recognise that both mental and physical health are relevant to safeguarding and the welfare of the children.

Naima JPS will ensure that all our staff have the skills and knowledge to take action where children need extra support from universal services and community-based early help, or require a social work service because they are in need, or need to be protected from harm.

We believe that safeguarding and promoting the welfare of children is everyone's responsibility, regardless of their role at our school. Anyone can make a referral to children's social care. If at any time there is a risk of immediate serious harm to a child, a referral will be made to children's social care immediately.

The procedures contained in this policy apply to all staff within our school, including permanent and temporary, supply staff, volunteers and governors.

Policy principles

- The welfare of the child is paramount
- Every single child in our care should be respected, valued and listened to
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in child protection issues will receive appropriate support

Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the school's commitment with regard to child protection to pupils, parents and other partners

Terminology

Safeguarding Providing help and support to meet the needs of children as soon as problems emerge. Protecting children from maltreatment, *whether that is within or outside the home, including online'*. Protecting children from maltreatment, preventing the impairment of 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. Naima always considers the best interests of the child. **Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full -time or part-time, temporary or permanent, supply staff, in either a paid or voluntary capacity.

DSL refers to the Designated Safeguarding Lead at the school

LSP refers to the Local Safeguarding Partners. In our case, this is the Westminster Local Safeguarding Partners, which forms part of the Tri-Borough LSP alongside the boroughs of Kensington and Chelsea, and Hammersmith and Fulham. The Westminster LSP adheres to the child protection procedures of the London Safeguarding Partners. *In this policy, our LSP shall be referred to as the Tri-borough LSC*. See below for a detailed overview of the role of our LSP. The multi-agency safeguarding arrangements are put in place by the safeguarding partners.https://drive.google.com/file/d/1oEUFO4IX0CUCSGJT5XbArqRwz1aFWCf7/view?usp=sharing

Child includes everyone under the age of 18.

Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Section 157 of the Education Act 2002 (Independent schools only, including academies and CTCs)
- The Education (Independent Schools Standards) (England) Regulations 2014 (Independent schools only, including academies and CTCs)
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguarding Children 2026
- Keeping Children Safe in Education, September 2026
- What to do if you're worried a child is being abused 2015
- The Prevent Duty Guidance 2023
- The London Child Protection Procedures, which the Tri-Borough of Westminster, Kensington and Chelsea and Hammersmith and Fulham Local Safeguarding Partners (LSP) advised change March 2021
- Sex-and-relationship-education 2020
- Sexual violence and harassment 2021
- Relationships and Sex Education (RSE) and Health Education 2025
- Working Together to Improve School Attendance 2024

Inspection- ISI

The Independent Schools inspectorate (ISI) is approved to inspect certain independent schools, and will also report on Safeguarding arrangements. ISI has a published framework which informs how it inspects at ISI.

Roles and responsibilities

Governors

Naima JPS has appointed Alexandra Maurice as a 'board-level lead' to take a lead in relation to responsibility for the school's safeguarding arrangements. However, the school considers that safeguarding duties remain the responsibility of the Governing Body as a whole. All governors and trustees are trained in child protection and have regular updates. The Governing Body is aware of their duties under the Human Rights Act and Equality Act, particularly for those children with SEND.

A review of the school's child protection policies takes place annually, including an update and review of the effectiveness of procedures and their implementation. In the first instance, the nominated safeguarding governor meets with the DSL and Deputy DSL's to review the implementation of the policy provisions and the effectiveness of the embedding of procedures across the school. This review in turn informs a subsequent annual review which is overseen by the Chair of Governors who signs it off. The review is also completed by the full Governing Body, who draw on the expertise of staff including the DSL as and when necessary.

The Governor responsible for Safeguarding will need to train every 2 years to keep up to date. All other Governors should have training so that they are fully aware of their duties and responsibilities and that they are equipped with the knowledge to fulfil their role. All Governors to date have attended training on site with Hilary Shaw. The Safeguarding Governor has completed Level 5 Governors child protection and safeguarding training.

All staff

All staff at Naima JPS have a statutory responsibility to:

- Have read Part One in full of Keeping Children Safe in Education, September 2026
- Provide a safe environment in which children can learn.
- Be aware of systems, policies and procedures within Naima JPS which support safeguarding, mental health and wellbeing as well as including the whistleblowing procedures.
- Be aware of the signs of abuse, neglect exploitation and modern slavery so that they are able to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm and in such circumstances to take appropriate action, working with other services as needed. All staff should be aware that safeguarding incidents and or behaviours can be associated with factors outside the school and can occur between children outside of these environments. All staff, especially the DSL and DDSL's should consider if a child is at risk of Abuse, neglect, exploitation and modern slavery in situations outside their families. Children can be vulnerable to multiple harms such as sexual exploitation, criminal exploitation and serious youth violence.
- All staff should be prepared to identify children who may benefit from Family Help.

- Work with the DSL and Deputy DSL's and, if required, to support social workers to take decisions about individual children.
- Attend appropriate safeguarding, child protection and Prevent training on appointment and subsequent refresher training at 3-yearly intervals.
- Naima JPS is committed towards utilising the knowledge and expertise of the staff to shape and develop the safeguarding arrangements and this Safeguarding and Child Protection Policy.

Key Personnel

We have a Safeguarding Committee as seen below.

Designated Safeguarding Lead (DSL)	**Gemma Babani**	
	Email address:	gbabani@naimajps.co.uk
	Telephone number:	020 7328 2802
Deputy Designated Safeguarding Lead & DSL with responsibility for the Early Years Foundation Stage (EYFS)	**Danielle Karr (EYFS)** **Corinne Nejad (KS2)**	
	Email address:	dkarr@naimajps.co.uk cnejad@naimajps.co.uk
	Telephone number:	020 7328 2802
Safeguarding Committee	Email address	Tom Bright –Online Safety tbright@naimajps.co.uk Batsheva Benzaquen- JS bbezaquen@naimajps.co.uk Christopher Brown- Registers and Attendance Officer cbrown@naimajps.co.uk
Nominated Safeguarding Governor	**Alexandra Maurice**	
	Email address:	alexandramaurice@me.com
	Telephone number:	07774424676
Head	**Bill Pratt**	
	Email address:	headmaster@naimajps.co.uk
	Telephone number:	020 7328 2802

The Designated Safeguarding Lead (DSL):

The governing body of Naima JPS must appoint an appropriate, senior member of staff, from the school Senior Management Team, to the role of Designated Safeguarding Lead (DSL). The DSL should take the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes are in place). This should be explicit in the role-holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussion and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.

The Naima JPS Designated Safeguarding Lead (DSL), Gemma Babani, has the ultimate lead responsibility for child protection, as set out above. She is also a Class Teacher and part of the Senior Management Team. In her absence there are three Deputy Designated Safeguarding leads to ensure there is robust cover. We also have a shared mailbox dsl@naimajps.co.uk

See DSL job description for full details (appendix 15). The DDSL's are also available.

The DSL is expected to:

- Refer cases of suspected abuse to the Local Authority children's social care as required.
- Support staff who make referrals to local authority children's social care
- Monitor Online Safety including filtering and monitoring.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Support staff who make referrals to the Channel programme.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.
- Undertake regular training to keep up to date with any changes. To have training in Online safety and SEND.
- Work with others.

The DSL is expected to:

- Liaise with the Head to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- As required, liaise with the 'case manager' and the Designated Officer(s) at the Local Authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- act as a point of contact with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard children 2026 (WTSC) NSPCC – when to call the police is designed to help DSL's and DDSL's to know when to call the police
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs, Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies

Remote Education:

The schools DSL with overall designated responsibility for safeguarding remains as well as the DDSL's throughout remote learning. Their roles and responsibilities remain even when remote learning takes place.

All staff in contact with pupils remotely will use school devices. Staff are aware that they cannot call parents off personal devices or communicate via any form of social media. Clear guidelines have been set out to staff, parents and pupils so that boundaries are in place.

Pupils have guidelines on how to use online systems safely and appropriately. When pupils work remotely; Google hangout is locked during the evening and weekends to make sure pupils are using these systems for the correct reason and responsibly.

Staff will be in regular contact with parents and carers if a child is learning through remote access. Staff will inform parents what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

Training

The DSL and the Deputy DSL's undergo training to provide them with the knowledge and skills required to carry out the role. This training includes local inter-agency working protocols and training in the LCPP's approach to The Prevent Duty 2023. This training is updated at least every two years. The DSL should have and understanding of the processes, procedures and responsibilities of other agencies in particular children's social care.

To ensure staff have regular Safeguarding training especially with relevant updates, at least once a year. All staff will undertake the following training as a minimum: Child Care and Protection, Online safety, The Prevent Duty and Child-On-Child abuse.

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

- Understand the assessment process for providing care and intervention, for example through locally agreed common and shared assessment processes such as family help assessments.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the Naima JPS Safeguarding and Child Protection Policy and procedures, especially new and part-time staff.
- Are alert to the specific needs of children in need, those with special educational needs and young carers.
- Are able to keep detailed, accurate, secure written records of concerns and referrals
- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Obtain access to resources and attend any relevant or refresher training courses; and.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

- To understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- To understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- 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
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;

The DSL should:

- Ensure the school's Safeguarding and Child Protection policies are known, understood and used appropriately
- Ensure the school's Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and updated whenever needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.
- Ensure filtering and monitoring is in place for online safety.
- Ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected Abuse, neglect, exploitation and modern slavery may be made and the role of the school in this; and
- Link with the local LSP to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Help promote educational outcomes by sharing information that is relevant with the child's teachers about their welfare, safeguarding and child protection issues. This may include sharing information from a child's social worker. The DSL should help the staff to identify any challenges the child has academically or otherwise and provide academic support and adjustments that will best support the child to progress and attain.
-

Additional barriers

Additional barriers can exist when recognising Abuse, neglect, exploitation and modern slavery for those children with SEND. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges. Children will be taught about cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so. For these children there may be a need for intimate care or are isolated from others; they are more likely to be dependent on adults for care.

Child protection file

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

Receiving schools should ensure key staff such as Designated Safeguarding Leads and SENCOs or the named person with oversight for SEN, are aware as required.

In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives. Child protection files are archived and maintained on MyConcern.

Availability

During term time, the DSL or the Deputy DSL's should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or Deputy DSL's) would be expected to be available in person, it is a matter for the school to define what 'available' means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. If in **exceptional** circumstances they are not available, then report must be made to SMT or directly to children's social care services.

In the absence of the DSL one of the DDSL's will be available to cover any out of hours/ out of term activities**.** We also have a shared mailbox **dsl@naimajps.co.uk**

The Deputy Designated Safeguarding Lead (DDSL): See job description for full details

We have three DDSL's to help support the DSL in her role. Dani Karr- Head of EYFS, Corinne Nejad (Key Stage 2) and Tanya Shapiro (Mental Health Lead). Our DDSL's are trained to the same level as the DSL and, in the absence of the DSL, both will carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the deputies will assume all of the functions above. In the case of an emergency the Headmaster is always available.

Good practice guidelines and staff code of conduct

Good practice includes:

- treating all pupils with respect.
- setting a good example by conducting ourselves appropriately.
- involving pupils in decisions that affect them.
- encouraging positive, respectful and safe behaviour among pupils.
- being a good listener - every single child at Naima JPS should feel able to talk to any member of staff to share concerns or discuss situations which are worrying them. We must ensure we listen to the child, take their worries seriously and share any information disclosed with the DSL.

- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation.
- recognising that challenging behaviour may be an indicator of abuse.
- reading and understanding the school's Safeguarding and Child Protection Policy, Staff Code of Conduct and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary directly to police or children's social care.

Abuse of position of trust

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

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

The Naima JPS Staff Code of Conduct sets out our expectations of staff and has been read and understood by all staff members. If parents would like a copy of this, please email the school secretary at secretary@naimajps.co.uk

Staff training

All staff at Naima JPS are trained in child protection regularly, in line with advice from the LSP. This includes training on The Prevent Duty and Online Safety. In addition, all staff receive training and are provided with guidance to help them recognise the possible signs of Abuse, neglect, exploitation and modern slavery and to know what to do if they have a concern. Staff are trained to manage a report of child-on-child sexual violence and sexual harassment.

The DSL and Deputy DSL's will receive training in child protection and inter-agency working at least every two years, and will receive updates at least yearly. All staff, including the DSL, Head and Governors, completed on-line training covering the Child Care and Protection, prevent duty, Online Safety and child-on-child Abuse. All staff will also receive safeguarding and child protection updates via email and during staff meetings throughout the year.

All Staff including EYFS, undertake in house training at the beginning of term in September for training of Safeguarding and Child Protection procedures and what to look out for. Anyone who misses this session will have to make an appointment with the DSL to complete this refresher training. Staff in the EYFS have a full Paediatric First Aid course delivered every three years. As stated in the EYFS Statutory Framework: safeguarding training for all EYFS staff happens every two years.

Part of the Induction process at Naima is making sure new staff, temporary staff, supply staff, volunteers and governors are aware of any safeguarding issues (information includes online safety which, and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). This training will include the following:

receipt of a copy of this Safeguarding and Child Protection Policy (child-on-child abuse, the staff behaviour policy/code of conduct (covering all situations relevant to the school including low-level concerns and allegations against staff); the Naima JPS Staff Handbook; the Staff Code of Conduct; Positive Behaviour Policy, Restrictive Intervention, Anti-Bullying Policy (cyber-bullying, prejudice-based and discriminatory bullying), Attendance and Missing Child from Education Policy, Mental Health Policy, details of the DSL and information about the role of DSL; a copy of Part 1 in full and Annex A of Keeping Children Safe in Education, September 2026; a copy of the Whistleblowing Policy; details of the school's policy regarding the acceptable use of IT and from education, mental health policy, the identity and function of the DSL and DDSL.

They will be expected to complete online modules through IAPS to cover the topics on Childcare and Protection, The Prevent Duty, Online Safety and Child-on-child abuse. This information may be provided electronically but will always be explained. Further individual training on safeguarding issues is available through the school's CPD budget, and staff are advised to approach the DSL regarding such training needs.

Preventative Education

Preventative education of safeguarding prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. Naima JPS a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

Helping children to keep themselves safe *(for further information see appendix 14 Child-on-child abuse)*

At Naima JPS, our children are taught to understand and manage risk through our personal, social, health and economic (PSHEE) education, our Jewish Studies curriculum, Relationships and Health Education (RHE) as well as and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of respect, and our children are encouraged to speak to a member of staff of their choosing about any worries they may have.

At JPS, we will all strive to eradicate the myths and assumptions that can lead to some children becoming alienated and disempowered, especially where the narrow approaches children may experience elsewhere may make it harder for them to challenge or question these radical influences. In our school, this will be achieved by good teaching, across the entire secular curriculum but particularly through our PSHEE and SMSC curriculum, across our Jewish Studies curriculum, and by the promotion of British Values. Our PSHEE provision is embedded across the curriculum, and it is reflected in our assemblies and underpins the ethos of the school. It is recognised that children with low aspirations are more vulnerable

to radicalisation and therefore we strive to equip our pupils with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves. We will ensure that all of our teaching approaches help our children build resilience to extremism in all its forms. We aim to teach resilience as part of a whole school approach to social and emotional wellbeing, which is tailored to the needs of the JPS pupils. We have introduced Relationships and Health Education (RHE) to our curriculum.

Listening to the child

At Naima JPS, we actively promote a culture of listening to our children, and take into account their wishes and feelings. In each class, the class teacher and Jewish Studies teacher work very closely together to ensure the children are supported pastorally. The children are all aware of a number of other members of staff they can talk to, including our school counsellor. We are committed to ensuring that children are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All children know that we have a senior member of staff (DSL) with responsibility for child protection, and know who this is. We inform the children of whom they might talk to, both in and out of school, and we inform them of their right to be listened to and heard and what steps can be taken to protect them from harm. We use a variety of PSHEE and online safety awareness materials to help pupils learn how to keep safe from organisations and initiatives which include but are not limited to the NSPCC, the Police, CEOP, Safer Internet Centre, SWGfL, Jewish Interactive the CST, Streetwise, the Anti-bullying Alliance and KidSmartz.

We are keen to ensure our children have ample opportunity to be heard and listened to. These opportunities include daily form periods, which provide contact time with the class teacher; our tutorials programme, in which all children from Year 3 upwards are assigned a tutor with whom they meet once every half term; regular school council meetings; and pupil questionnaires and class worry boxes. We make our children aware of these arrangements by informing them during form time and assemblies.

The Local London Safeguarding Partners offers clear guidance in the 'Responding to Concerns' section of its Child Protection Procedures for staff on listening to children who may be disclosing a concern. This guidance is detailed below.

- Whenever a child reports that they are suffering or have suffered significant harm through abuse, neglect and exploitation, or have caused or are causing physical or sexual harm to others, the initial response from all professionals should be limited to listening carefully to what the child says to:
    - Clarify the concerns;
    - Offer reassurance about how the child will be kept safe;
    - Explain what action will be taken and within what timeframe.

- The child must not be pressed for information, led or cross-examined or given false assurances of absolute confidentiality, as this could prejudice police investigations, especially in cases of sexual abuse.
- If the child can understand the significance and consequences of making a referral to the Local Authority children's social care, they should be asked for their view.
- However, it should be explained to the child that whilst their view will be taken into account, the member of staff has a responsibility to take whatever action is required to ensure the child's safety and the safety of other children.
- There should be no leading questions by staff and no promise of confidentiality.

Further guidance for staff in the event that a child discloses information relating to a child protection concern is as follows:

- Stay calm and be reassuring - respond with tact and sensitivity, and do not make judgements.
- Find a quiet place to talk and allow the child to speak in their own time and at their own pace - you should still find somewhere that is in the open but away from a crowd, and you should tell someone else where you are going and with whom.
- Listen carefully to what is said.
- Do not promise to keep secrets - find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others.
- Only ask questions for clarification purposes - at all times avoid asking questions that suggest a particular answer (leading questions).
- Reassure the child that they have done the right thing in telling you.
- Tell the child what you will do next and with whom the information will be shared
- Record in writing what was said, *using the child's own words and without interpretation or making assumptions,* as soon as possible - note the date, time, any names mentioned and to whom the information was given and ensure that the record is signed and dated.

Children who may be particularly vulnerable

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
- children who have mental health issues
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations or where the child may observe domestic abuse at home and then suffer with intimate personal relationships in the future.
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of child sexual exploitation (CSE)
- at risk of child criminal exploitation- (including financial exploitation) (CCE)
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

Keeping Children Safe in Education, September 2026 defines 'Children suffering or likely to suffer significant harm' we have a duty to make enquires under section 47 of the Children

Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare.

The list above provides examples of additionally vulnerable groups and is not exhaustive. In order to ensure that we meet the needs of those children who may be particularly vulnerable, Naima JPS recognises the importance of close collaboration with other agencies. The school therefore undertakes to work closely with the Multi-Agency Safeguarding Hub (MASH) of the Tri-borough of Hammersmith and Fulham, Kensington and Chelsea and Westminster (Tri-borough MASH website). The Schools Lead for the Tri-Borough MASH is David Stoffell, who can be contacted on 020 7641 7274 or by email at dstoffell@westminster.gov.uk

Children who are Lesbian, Gay, Bi, or Trans (LGBT)

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. It is therefore vital that they are provided with a safe space for them to speak out or share their concerns with members of staff.

Children who are questioning their gender

It is not for schools and colleges to initiate any action in this area; KCSIE is focused on circumstances where a child or their parent has raised a request relating to social transition to which a school or college is responding. Bullying will never be tolerated; we will consider requests for support with social transition, Naima will take a 'very careful approach' and will not initiate social transition. We will work with parents/carers who should be actively involved in the 'vast majority' of cases and their views treated with importance; accommodating social transition in primary schools will be treated with caution and full social transition agreed very rarely; complying with obligations under the Equality Act and Human Rights Act.

Children missing education and absent children from education- Further information see our policy on children missing education

We enter pupils onto the admission register at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend the school.

We monitor pupils' attendance by registering children twice a day at the start of school and after lunch break. Parents are asked to call in or email to let teachers know if their child is off sick or if they have an appointment. Parents who do not call up will receive a call from the office to find out why their child is not at school. Pupils who have poor attendance are then logged onto My concern. Every two weeks Christopher Brown (Attendance Officer) checks registers to look at how often children are off school and for what reason. He reports back to class teachers, the Head and DSL and any child who appears to be off school frequently. This is noted on My Concern and the parents are notified by an email. At the end of every term parents are sent an email with a log of their child's attendance/ absence record- parents are reminded that absence affects children's progress and learning. Parents are encouraged not to take children out of school to go on family holidays. ***See Attendance and Children Missing from Education Policy for further details.***

Children missing education from school could act as a vital warning sign that they are involved in county lines, or some kind of child abuse, including; sexual abuse or exploitation, criminal exploitation, FGM, forced marriage, mental health problems, substance misuse or travelling to conflict zones.

Where reasonably possible, we will hold more two emergency contact numbers for each pupil.

We will inform the local authority of any pupil who is absent regularly without permission for a continuous period of ten school days or more. We will also contact our LA if we remove or add a child to our admissions register at a non-standard transition time.

Whistleblowing if you have concerns about a colleague

Staff at Naima JPS who are concerned about the conduct of a colleague (supply staff, trainee teachers or volunteers) towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. Refer to The Naima JPS Whistleblowing Policy for further information and guidelines in order to enable staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported only to the Head. Complaints about the DSL should be made to the Head and complaints about the Head should be reported to the Nominated Safeguarding Governor in the first instance.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

In February 2016, the NSPCC launched a new whistleblowing helpline for professionals, which is an advice line for anyone concerned about how workplace child protection issues are being handled. The helpline number is 0800 028 0285, and further information can be found on the NSPCC website, via https://www.nspcc.org.uk/fighting-for-childhood/news-opinion/new-whistleblowing-advice-line-professionals/.

Safeguarding concern/Allegations against teachers and other staff

Allegations or safeguarding concerns may arise following a complaint from a parent or child, or through concerns raised by other staff members. As part of our whole school approach to safeguarding, JPS promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including trainee and supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

By enabling an open and transparent culture, allows the school to identify concerning, problematic or inappropriate behaviour early; minimising the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of JPS.

Allegations or safeguarding concerns are separated into two sections; allegations that do not meet the harms threshold (low level concerns) and allegations that may meet the harms threshold. When a low-level concern has been raised by a third party, the Head Teacher should collect as much evidence as possible by speaking where possible with the person

who raised the concern, to the individual involved and to any witnesses. Concerns will be recorded in a safeguarding folder, in the Head Teachers office in the filing cabinet, which is locked. The name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible. This may lead internal disciplinary procedures, or referral to the LADO if the harms threshold is met. The school must consider if any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

Allegations that do not meet the threshold (*Low Level Concerns*)

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.

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.
- includes humiliating pupils

Allegations that may meet the harms threshold

Allegations made against a staff member may indicate that a person could potentially pose as a risk of harm if they continue to work in their present position with children.

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

• 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 to children; and/or
• behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Where there is a conflict of interest in reporting a concern that meets the harms threshold, the LADO should be consulted directly.

1. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children has:

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

Low-Level Concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

Allegations or safeguarding concerns may be made directly to the school, or to the police who will then inform the school. Anyone dealing with allegations/safeguarding concerns against a member of staff, supply staff, contractor or a volunteer at Naima JPS at the outset, must report all concerns only to the Head or, in his absence, to the Chair of Governors. Where the DSL is the subject of an allegation/safeguarding concern, this will be reported to the Head; Where you identify a concern about the Head, you must report the matter immediately to the Chair of Governors without first notifying the Head.

Agencies (for supply and contracted staff) will be kept fully informed and involved even though the Head deals with the issue with the LADO. The Head will follow advice given by the LADO.

Allegations/safeguarding concerns should be reported immediately, and a written, dated record must be made by the Head/Chair of Governors as soon as practicable, but within 24 hours. The Head teacher will keep a record of concerns raised by staff members in a confidential and locked cabinet (see appendix 10 for low level concern procedure).

Supply staff/agency staff/service providers who are subject to an allegation would be treated in the same way a member of staff who is employed by the school. In this instance we would contact the Local Authority's Designated Officer (LADO) for advice and the supply staff agency to inform them and their HR department of what has happened. At all times during the investigation process we will keep the supply agency informed and involved. The agency staff may want to seek advice from their Trade union or have a representative present.

The school will not undertake its own investigations of allegations without prior consultation with the Local Authority's Designated Officer (LADO) or in the most serious cases, the police, so as not to jeopardise statutory investigations. No action will be taken by the school unless the LADO has advised us to. The LADO will always be consulted first and this will only take place on their recommendation.

The Local Designated Officer should be informed of all the allegations/concerns that come to the school's attention so that they can consult the police and Children's Services Social Care colleagues as appropriate. The case should be reported to the Local Designated Officer within one working day. In the most serious of cases and if a crime has been committed, the police must be informed.

Role of the Local Authority Designated Officer

Under local and national procedures, each Local Authority is obligated to appoint a named officer to be involved in the management and oversight of cases where an allegation has been made against a professional. This is the Local Authority Designated Officer (LADO).

The LADO is responsible for liaising with the police and other agencies, as well as ensuring that the cases are dealt with as quickly as possible with consistency and with a thorough and fair process.

The LADO has responsibility for:

- Overseeing the management of individual cases
- Providing advice and guidance to employers
- Liaison with the police and other external agencies
- Monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent and with a fair and thorough process.

The full procedures for dealing with allegations against staff can be found in Keeping Children in Education 2026 and in the school's Allegations of Abuse Against Staff Policy and procedures.

Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the police.

Naima JPS will make an immediate referral to Children's Social Care and Ofsted of any allegations of immediate serious harm or abuse by any member of staff working with or looking after children on our premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere. The school will also notify Ofsted of the action taken in respect of the allegations. These notifications will be made as soon as is reasonably practicable, but at the very latest within 14 days of the allegations being made.

Those children in need of some support from one or more agencies and do not meet the threshold of the above mentioned; they will receive 'family help', inter-agency assessment and intervention using local processes, including Common Assessment Framework (CAF) and 'Team around the Child (TAC).

Safer recruitment

Our school complies with the requirements of Keeping Children in Education 2026 and the Tri-borough LSP by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The school's Safer Recruitment Policy sets out the process in full and can be found on the Naima JPS website and the school app.

At least one member on the recruitment panel will have completed safer recruitment training.

All relevant staff (involved in early years' settings and/or before or after school care for children under eight, volunteers and supply staff) are made aware via their contract of employment of their obligations to disclose relevant information to the school so we can make all the relevant checks. As part of the Disqualification Under the Childcare Act 2006, we must not knowingly employ anyone to work with children or directly concerned with its management if they are directly disqualified from childcare. Governors will have a DBS check and the school will use the Secure Access Portal to check whether the Governor's are barred as a result of being subject to a section 128 direction.

The school obtains written confirmation from supply agencies or third party organisations that agency staff, supply staff or other individuals who may work in the school have been appropriately checked. This written confirmation includes; certificates and any enhanced DBS checks have been carried out.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained. If a DBS check is late but has been applied for, a member of staff will need to supervise the new employee around the school until the DBS arrives. A risk assessment will be placed in their personnel file and signed off every two weeks to say they were supervised until the DBS arrives.

The school maintains a single central record of recruitment checks undertaken for all staff, including teacher trainees on salaried routes, agency staff and supply staff.

The Naima JPS Safer Recruitment Policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that any offer of employment is subject to. Whilst these checks are carried out pre-employment, the school also has a legal duty to refer to the DBS:

- Any applicant who has applied for a position at the school despite being barred from working with children; and
- Anyone who has harmed, or poses a risk of harm, to a child, and who has been removed from working (paid or unpaid) in a regulated activity, or would have been removed had they not left.

Failure to refer in circumstances where the above criteria are met is an offence. Where there are serious concerns about a teacher's suitability to work with children, separate consideration will be given to whether a referral to the Teaching Regulation Agency (TRA) should be made. This is the case irrespective of whether the DBS criteria have been met.

The school will consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate, and should make reference to this in their policies. The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in *Teacher misconduct: the prohibition of teachers* (October 2015). Further guidance is published on the TRA website.

Prohibition on Participation in Management under the Education and Skills Act 2008

The school must check that staff appointed to management positions are not subject to a Section 128 Direction. This is carried out through the Disclosure and Barring Service (DBS) barred list check as long as it is clear when applying for a DBS what position has been applied for. This relates to members of the Senior Management Team (SMT whether appointed externally or through internal promotion. A Head of a subject/Area or the Lead in a subject is our terminology for curriculum co-ordinator and therefore holders of this role are not subject to a prohibition from management check.

All staff will be asked yearly to complete a 'Declaration of criminal record' and other relevant information' form when shortlisted.

Volunteers/apprentices/work experience/Governors

Volunteers, apprentices, work experience students and governors will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will any of those named above who have not been appropriately checked, be left unsupervised.

We do not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's relatives or other visitors attending a sports day).

For anyone wanting to undertake work experience at our school we would obtain a DBS check unless under the age of 16 where we would complete a Risk assessment. See our Policy on Volunteers for more information. A member of staff will need to supervise the volunteer around the school until the DBS arrives.

Contractors

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day. It is rare for us at Naima to have regular contractors on site however, if we did, we would provide them with a basic overview of the safeguarding expectations of our school and make them aware of who the DSL and the DDSL's are.

Site security and guidelines for visiting speakers

As part of providing the broadest possible education for our pupils, we frequently have visiting speakers visit the school to talk to the children, to lead workshops and to contribute to the delivery of our secular, Jewish Studies, PSHEE, RHE and SMSC curricula.

All visiting speakers, whether invited by staff or by pupils, are subject to suitability checks which can include online research (via Google and/or social media networking sites) and seeking a reference from other schools where they have spoken.

At Naima JPS the following procedures are in place with regard to visitors to the school, including contractors:

1. Where a visitor has been invited to the school by a member of staff, the member of staff in question must inform (prior to the meeting, but in any event as soon as the meeting has been arranged) the school Administrator by email of the time and date of the visitor's arrival, together with the visitor's name and the organisation they work for or represent.
2. Staff must inform (prior to the meeting but in any event as soon as the meeting has been arranged) the school Security Team by email of the time and date of the visitor's arrival, together with the visitor's name and the organisation they work for or represent.
3. The member of staff inviting the visitor should request that the visitor brings suitable photographic ID and advise them that they will have to go through security checks in order to enter the school (and to therefore allow plenty of time to account for this).
4. On arrival at the school, the visitor must provide our Security Team with their name and ID, state the purpose of their visit and give details of who invited them to the school.
5. Our Security Team will then check this information against their Meetings Schedule to insure that it is verified.
6. The Security Team will then undertake a risk assessment to determine whether it is safe for the visitor to enter the school; this may include various questions and searches.
7. The security Team will take a photograph of the visitor, which is then kept and stored in the Security records, together with the name of the visitor and the organisation they work for/represent.

Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations. The Head will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

Extended school and off-site arrangements

The School's Safeguarding Policy and Procedures will apply during residential trips. When a Trip Leader is planning a residential trip and undertaking risk assessments s/he should closely consult with the DSL regarding Safeguarding and Child protection aspects with the DSL giving final approval. Conduct on residential trips by both pupils and staff must be consistent with Jewish values and the school's expectations.

At the beginning of any residential trip, the Trip Leader should make children aware, during the pupil briefing, that they should speak to him or her (or another named designated adult) if they have any concerns just as they would speak to an adult at school. Any incident or child reported incident amounting to a Safeguarding allegation or concern should be dealt with appropriately at the time (following Safeguarding procedures) and reported to the DSL at school immediately or as soon as possible.

All members of staff on a residential trip have a duty of care to look after pupils and are responsible for their safety and well-being.
Trip Staff: -

- Should include both male and female members of staff, where possible, in proportion to the number of pupils of each gender
- should not enter pupil accommodation unless fulfilling their 'in loco parentis' role and are reacting as a responsible parent
- must leave the accommodation door open if entering accommodation area/dorm

- give instructions by knocking firmly on the accommodation door, pausing and opening it slightly and delivering direction

Staff/pupil online relationships

Naima JPS provides advice to staff regarding their personal online activity via The Naima JPS Social Media Policy and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

Online Safety- is part of a broad and balanced curriculum. All pupils will be made aware of online risks and taught how to stay safe online. All staff will need to complete Online Safety training through IAPS online. Through this training, all staff members will be made aware of children's attitudes and behaviours which may indicate they are at risk of potential harm online and the procedure to follow when they have a concern regarding a pupil's online activity.

Most of the pupils at Naima JPS will use mobile phones, tablets and computers at some time. These devices are a source of fun, entertainment, communication and education. However, we know that some men, women and young people will use these technologies to harm children. This harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations (e.g. sexting, or banter), sexually harass their peers, share indecent images consensually and non-consensually, webcam photography or face-to-face meetings. The Naima JPS Online Safety Policy explains how we try to keep pupils safe in our school. Cyber-bullying by pupils, via texts and emails, is treated as seriously as any other type of bullying and is managed through our Anti-Bullying Policy. Safeguarding and e-safety are taught throughout the curriculum, especially in computer which include racism, derogatory behaviour and other forms of physical violence and conflict.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access these sites in school. Some pupils will undoubtedly be 'chatting' on mobile phones or social networking sites at home and we provide regular guidance through our Computing lessons, PSHEE/RHE lessons, assemblies and workshops. We also never use a full name for account usernames; this is to keep children's identities safe but also in line with GDPR. We send a tech newsletter home to parents 4 times a year with information for parents on online safety and how they can support their children online. This is in addition to parent workshops and drop in sessions which are themed on online issues such as: data, gaming, chatting online, 'My first Mobile Phone', social media and filtering internet in the home.

All online safety incidents are logged on My Concern and investigated. We encourage parents to restrict their mobile phone use whilst on school grounds so there is a stronger expectation to reduce device-related safeguarding risks.

Appropriate monitoring and filtering systems are in place in Naima JPS, and reports are analysed. The school is well aware of the risk posed by access to the internet by unfiltered 3G, 4G and 5G devices, and such risk is kept under review. The school has a clear policy with regard to the use of mobile devices and sanctions are in place for digital or cyber misconduct. We regularly refer to the cyber security standards for schools and colleges

Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK (www.gov.uk)

The Department for Education's filtering and monitoring standards set out that schools and colleges should:
• 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.
• have effective monitoring strategies in place that meet their safeguarding needs.
• schools can use the department's 'plan technology for your school service' to self- assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

Regular meetings are held involving all IT stakeholders, governors, staff, including the security guards, to discuss and review e-Safety, amongst other duties. New families that join Naima JPS are asked to sign our acceptable usage policy in which they must comply with the school's technology and IT systems and monitoring.

In line with KCSIE 2026, Naima JPS recognises that online safety is a critical aspect of safeguarding for our primary school community. Harmful online content is defined broadly to include exposure to illegal, inappropriate, or harmful material, encompassing:

- Pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- misogynistic/misandrist messages
- Misinformation, disinformation (including fake news), and conspiracy theories.
- Age-inappropriate content (e.g., violent games, online grooming risks), exposure to age-inappropriate apps (e.g., unmoderated chat functions), cyberbullying among younger pupils (e.g., name-calling via digital platforms), and parental concerns (e.g., inappropriate advertising, sharing personal information). We integrate this definition into safeguarding training and online/e-safety procedures (as detailed in our Online Safety Policy), with annual staff training tailored to primary-aged pupils, and incidents reported via our Designated Safeguarding Lead (DSL).

At Naima JPS, children are not permitted to use AI sites or products, including generative AI, to complete classwork or homework unless authorised by the class teacher and Senior Management Team. Authorised use follows age-appropriate guidelines, monitored via Smoothwall filtering and monitoring systems to ensure safety. Staff receive annual training on the safe use of generative AI, including risk assessments, and are guided by the DfE's *Generative AI: product safety expectations*. The Head of Computing and Digital Learning, alongside the DSL, will work with IT staff and service providers to review and update these measures annually, ensuring integration with our safeguarding framework (as detailed in our Online Safety Policy).

For further information can be found here to help support children to keep safe online- Department for Education 2024
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf

There are 4 main areas of risk in relation to online safety, which should be taken into account when dealing with online activity.
content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, sharing other explicit images and online bullying, and
commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

Security and Management of Information Systems

In accordance with the requirements set out in KCSIE 2026 and the Department for Education (DfE) filtering and monitoring standards for schools, Naima JPS uses Smoothwall filtering to block harmful and inappropriate content and Smoothwall monitoring to record input prompts and responses, alerting the Designated Safeguarding Lead (DSL) and Senior Management Team when a child attempts to access harmful or inappropriate content, including generative AI sites and products. The Head of Computing and Digital Learning, in collaboration with the DSL and technical staff managed by our Managed Service Provider, is responsible for managing these systems. We will review our filtering and monitoring provision annually, utilising the DfE's 'plan technology for your school' service for self-assessment and personalised recommendations to ensure compliance and effectiveness. This process is integrated with our broader online safety measures (as detailed in our Online Safety Policy) and includes regular reporting to the Senior Management Team and Governing Body.

Virus protection is provided by Panda Anti-Virus: the school I.T. Technician runs a weekly virus and has configured the anti-virus software to automatically update as and when required. Personal data sent over the Internet or taken off site (such as via portable media storage) will be encrypted or accessed via appropriate secure remote access systems. Portable media may not be used without specific permission followed by an anti-virus /malware scan.

Unapproved software will not be allowed in work areas or attached to email.

Files held on the school's network will be regularly checked.

The I.T. Technician will review system capacity regularly.

The appropriate use of user logins and passwords to access the school network will be enforced for all but the youngest users.

All users will be expected to log off or lock their screens/devices if systems are unattended.

Cyber Attack

In accordance with the cyber security standards for schools and colleges, Naima JPS regularly assesses cyber risks and takes a proactive approach to defend our IT systems against potential incidents or attacks as well as data breaches and infringements. This includes applying Multi Factor Authentication to all user accounts and services, using anti-virus and anti-malware software across the school network, and leveraging support from our Managed Service Provider. We conduct annual reviews of these procedures, guided by resources from the National Cyber Security Centre (NCSC) and the National Education Network. The Head of Computing and Digital Learning, in partnership with the Senior Management Team, oversees these efforts, with updates reported to the Governing Body to enhance resilience against evolving cyber threats.

Use of mobile devices in the Early Years Foundation Stage (EYFS) setting

A 'mobile device' may refer to a phone, iPad, iPod, iPhone, Blackberry or any form of handheld phone, tablet or laptop with the facility to take photographs and transmit them electronically and/or to hold conversations, or personal video recorders and cameras.

Staff members will not use personal electronic devices e.g. mobile devices/phones or cameras with imaging and sharing capabilities when pupils are present. Staff may use mobile phones on school premises e.g. in the staffroom during breaks or non-contact time and outside of working hours when no pupils are present.

Mobile phones will be safely stored and in silent mode whilst pupils are present. Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when pupils are present. Staff may not contact parents or carers on their personal devices, unless an emergency situation arises.

Mobile devices or any of other electronic devices will not be used to take images/ videos or any other sharing capabilities of pupils or staff in any circumstances. The sending of inappropriate messages or images (of a sexual or abusive nature) from school mobile devices or personal devices in school hours is strictly prohibited. Staff who do not adhere to this policy will face disciplinary action.

Parents are not allowed to use their mobile devices within the EYFS setting, and there are notices informing visitors of this on all the entry points. Personal mobile devices cannot be used to record classroom activities – only school property can be used for this purpose. Photographs are taken for the purpose of recording a child or group of children participating in activities or celebrating their achievements. These form an effective record of a child's progression in the EYFS. However, it is essential that photographs are taken and stored appropriately to safeguard the children in our care. Images can only be transferred to and stored on a school computer to be printed. Parental consent is sought for photographs to be taken or published, e.g. on the Naima JPS app, website or in publications.

During trips and visits, only school provided mobile phones and cameras should be used. A member of staff may take his/her personal device, but only for the purposes of contacting school. For further information; please see Online Safety Policy and Acceptable Use Policy.

Ratio and sleeping in the EYFS

Staffing arrangements in the EYFS, ensure there is the correct ratio of adults to children at all times. The children at Naima are always in sight and hearing of a practitioner. Pre-Nursery is now full time and the children sleep in a classroom after lunch. All children are closely supervised, with two staff staying in the classroom while they sleep to ensure they are safe. Being safe includes ensuring all the children's bedding and equipment are in good condition and are appropriate for the children. Staff will have the appropriate and approved qualifications to count in the ratios, including at least one staff member trained in paediatric first aid.

Choking

All children in the school are supervised during lunchtime. This is to ensure there is rapid action if choking of a child was to occur or detect signs of it. See the EYFS policy on 'food, drinks and nutrition' for further details on safer eating rules and supervision.

If you are concerned about a pupil's welfare

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use My Concern to record these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the DSL.

If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL**. The point at which they tell the pupil this is a matter for professional judgement. During their conversations with the pupil's staff will:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- not be afraid of silences
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's mother think about it No leading questions will be asked.
- at an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on and explain to whom and why. There will be no promise

of confidentiality relayed.
- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- complete the **safeguarding concern form** and log it to the DSL as soon as possible
- seek support if they feel distressed.

Notifying parents

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

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

Confidentiality and sharing information (as well as sharing information with the next school)

All Naima JPS staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, Head or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Where children leave the school, the Designated Safeguarding Lead should ensure their 'My Concern file is transferred to the new school as soon as possible (within 5 days), ensuring secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools should ensure key staff such as Designated Safeguarding Lead s and SENCOs are aware as required.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

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

protection records, they will refer the request to the Head or DSL.

The Data Protection Act 2018 and the General Data Protection Regulation (GDPR) does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protection of children. There is now a 'Data Protection toolkit for schools'- this is guidance to schools to support them with data protection activity, including compliance and GDPR.

The school's confidentiality and information-sharing policy is available to parents and pupils on request from the School Office.

A Child In Need and Child Protection Plans

Keeping Children Safe in Education, September 2026 define: A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. In this instance the SENCO will be closely involved to support the child and class teacher. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. The child may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect or complex family circumstances. LA's should share the fact a child has a social worker with the DSL so that the school can support the child to keep safe, support their education and welfare needs.

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.

Referrals and Family help

Family help is universal services and community-based early help. Family help means acting on and referring early signs of abuse and neglect and radicalisation including support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It provides support as soon as a problem emerges, at any point in a child's life. It may be the child is frequently missing/goes missing from education, home or care or has a parent or carer in custody or is affected by parental offending and add has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit. This also includes pupils who are repeatedly removed from the classroom or on a part-time timetable. It is important to involve safeguarding agencies by providing universal services and community-based early help, and the targeted early help level of Family Help.

Any pupil may benefit from family help, but in particular staff will be alert to the potential need for family help for pupils who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and or is a parent themselves

- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines

Family help will also be used to address non-violent harmful sexual behaviour to prevent escalation. All staff will be made aware of the local family help process and understand their role in it. The DSL will take the lead where family help is appropriate.

The school will refer to the Thresholds of Needs Guide of the Tri-borough and eligibility criteria to help make decisions on the child's level of need and the appropriate service to refer to for services.

Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency, i.e. if at any time there is a risk of immediate serious harm to a child, and the Designated Safeguarding Lead, the Head and the chair of governors are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

The role of the Local Authority:

- 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 the referrer know the outcome. This will include determining whether:
- the child requires immediate protection and urgent action is required;
- whether the child is in need, and should be assessed under section 17;
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47;
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.
- The referrer should follow up if this information

Bullying

While bullying between children is not a separate category of abuse, neglect and exploitation, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will

be managed through our Anti-Bullying Policy which can be accessed on the Naima JPS website and school app.

Managing allegations of abuse by one pupil against another – For more information see Appendix 14 Policy and Procedure on child- on -child sexual violence and sexual harassment

All staff should recognise that children are capable of abusing their peers. All staff should be clear about their school's policy and procedures with regard to child- on- child sexual violence, harassment and misogyny.

Any cases of suspected abuse by one or more pupil against another pupil must be referred to the Local Authority Designated Officer, who will advise on the best course of action.

child –on- child sexual violence, harassment and misogyny abuse is most likely to include, but may not be limited to:

- Abuse within intimate partner relationships
- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Child-on-child sexual violence and sexual harassment;
- causing someone to engage in sexual activity without consent
- consensual and non-consensual sharing of images
- upskirting
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.
- Sharing of nude and semi-nude images (self-generated intimate images and/or videos including those generated using AI e.g. deepfakes)- forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party
- Modern slavery

At Naima JPS, we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm not only by adults in the school, but also by other children.

Mental health

Mental health issues can be in some cases an indicator that a child has suffered or is at risk of suffering from some form of abuse, neglect or exploitation. Mental health difficulties can develop into safeguarding risks, including self-harm, suicide-harm or suicide and eating disroders.

Staff cannot diagnose a child's mental health problem, however, they can observe daily and identify the behaviours that they feel are worrying and report to the Head/ DSL or our Mental Health Lead, Mrs Tanya Shapiro.

Children who have suffered abuse, neglect or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout their lives. Staff need to be aware of these children's experiences and how it can impact on their education. Behaviour,

interactions and their mental health.

If staff have a mental health concern as well as a safeguarding concern about a child, immediate action should be taken. Inform the DSL, write it up on My Concern and the DSL will follow the guidelines set out in our school safeguarding policy. When necessary, referral pathways will be used for support.

There have been many recent publications made especially during the COVID 19 pandemic to help support children with mental health issues. Mental Health and Behaviour in Schools, Promoting children and young people's emotional health and wellbeing. See our Emotional Health and Wellbeing Policy for further information.

Children with sexually harmful behaviour

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's **Anti-Bullying Policy** where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

Children who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a pupil's sexual behaviour, including any known online sexual behaviour, should speak to the DSL as soon as possible.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal activity in exchange for something they want or need. It could be for financial reasons; this could lead to violence or the threat of violence. CCE does not always involve physical contact, it can occur through the use of technology.

CCE can include children being forced to work in a cannabis factor, coerced into moving drugs or money across the country (county lines), forced to shop lift, pick pocket or to threaten other young people.

The indicators of CCE and CSE are often the same:

- 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
- children who regularly miss school or education or do not take part in education.

Child Sexual Exploitation (CSE)

It is illegal to take, show or distribute indecent photographs of children, or to pay or arrange for sexual services from children. It is also against the law if someone in a position of trust (such as a teacher) has sex with a person under 18 that they have responsibility for. Child sexual exploitation is when an individual or a group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for

something they want or need. Their power may result from a difference in age, gender, intellect, strength, money or other resources. Some children are "groomed" through "boyfriends" who then force the child or young person into having sex with friends or associates. Sexual abuse covers penetrative sexual acts, sexual touching, masturbation and the misuse of sexual images – such as on the internet or by mobile phone. Children and young people involved may not understand that non-consensual sex (sex they haven't agreed to) or forced sex is rape.

Signs of grooming and child sexual exploitation These include the child or young person: going missing for periods of time or regularly returning home late, skipping school or being disruptive in class, appearing with unexplained gifts or possessions that can't be accounted for, experiencing health problems that may indicate a sexually transmitted infection, having mood swings and changes in temperament , using drugs and/or alcohol , displaying inappropriate sexualised behaviour, such as over-familiarity with strangers, dressing in a sexualised manner or sending sexualised images by mobile phone ("sexting") , may also show signs of unexplained physical harm, such as bruising and cigarette burns.

Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

Naima JPS includes the risks of sexual exploitation in the PSHEE and RHE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

Upskirting

Changes to the Voyeurism (Offences) Act 2019 criminalise 'upskirting'. This refers to the act of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph of their genitals or buttocks with or without underwear to obtain sexual gratification, cause humiliation or distress without their permission or knowledge.

Emotional and sexual abuse tend to be indicated by behavioural rather than physical marks.

- These can include Developmental delay
- The child seems insecure around parents
- Aggressive behaviour
- The child being blamed or treated as a "scapegoat"
- Low self-esteem/lack of confidence
- Withdrawal/"loner" with difficulty relating to others
- Sexualised conversation/behaviour

Emotional abuse is present in any form of abuse and can also appear alone.

Honour or faith Based Abuse

'Honour or faith-based' Abuse this is defined as 'A crime or incident which has, or may have, been committed to wrongly protect or defend the perceived honour of the family and / or community.' This can include: Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All are forms of abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupil about going on a long holiday during the summer vacation period.

Naima JPS is fully aware of its duties with regard to the Mandatory Reporting of FGM, which was introduced via the Serious Crime Act 2015 which came into force on 31st October 2015. Reports of FGM on children are investigated by the Child Abuse Investigation Police Team (CAIT). Reports of FGM should be made by calling 101, the single non-emergency Police number. In the event of any difficulties referring via that route, a Child Protection Advisor from the Westminster Duty team will be able to assist. In an emergency situation, staff are advised to call 999.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. Since February 2023 it is also a crime 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.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to, the following:

- Increased absence from school
- A change in friendships
- New relationships with older individuals or groups

- A significant decline in academic performance
- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions

County lines criminal activity

This refers to drug networks or gangs grooming and exploiting children to carry drugs (sometimes using techniques such as 'plugging' – where drugs are concealed internally to avoid detection) and money using dedicated phone lines or another form of 'dead line'. Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL. The DSL will consider referral to the National Referral Mechanism on a case-by-case basis.

Indicators that a pupil may be involved in county lines activities include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in school results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

There are a number of areas in which young people are put at risk by gang activity, both through participation in and as victims of gang violence which can be in relation to their peers or to a gang-involved adult in their household. A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

According to the (DfE 2019a) 'All staff should be aware of the associated risks and understand the measures in place to measure these. Advice for schools is provided by the local services/ third sector providers or Home Office's Preventing Youth Violence and gang involvement and its criminal exploitation of children and vulnerable adults.

Radicalisation and Extremism

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised

form but at Naima JPS we should also remain alert to the risk of radicalisation into Jewish extremism and white supremacy extremism.

Terrorism is an action that endangers or causes serious violence to a person or group of people. Causing damage to their property or seriously interfering or disrupting electronic systems. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

School staff receive training every two years to help to identify signs of extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014). The Naima JPS PSHEE policy contains further information, and can be accessed via the school's website.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf

The school is aware that radicalisation can occur through different methods such as: social media, internet and within the home. If we at school felt a child may be at risk of radicalisation the DSL will make a Prevent referral should the need arise. The school will also carry out a risk assessment for Prevent, which can be found on our central server.

Related safeguarding portfolio policies

This policy should be read alongside our other safeguarding policies, which are set out in Appendix 4.

Special Circumstances

Looked after children
The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe.

We should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care

outside England and Wales.

The designated teacher is the DSL at Naima who has received training.

Private Fostering:

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents who have moved away, but the child stays behind (e.g. to stay at the same school to finish exams)
- teenagers estranged from their families

There is no duty for schools to be given information about a child who is privately fostered by the family, carer or the local authority. There is however a duty on schools to inform children's services where they become aware of such an arrangement. Further guidance regarding private fostering arrangements is available on the Tri-Borough LSP website at the following link:
https://www.rbkc.gov.uk/subsites/lscp/parentscarersandthepublic/privatefostering.aspx

Children staying with host families (HOMESTAY)

The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable. In such circumstances the school follows the guidance in Annex D of Keeping Children Safe in Education, September 2026 to ensure that hosting arrangements are as safe as possible. In certain circumstances the arrangement where children stay with UK families could amount to 'private fostering' under the Children's Act 1989 – the LA may need to be contacted in certain circumstances.

The use of 'reasonable force' – refer to Policy on Reasonable/ Restrictive Intervention Policy.

There are circumstances when it is appropriate for staff in schools to use reasonable force/ Restrictive Intervention policy to safeguard the children in their care. The term 'reasonable force' or Restrictive Intervention covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' and Restrictive Intervention in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a child's path, or active physical contact such as leading a child by the arm out of the classroom. We need to be mindful when dealing with children who have SEND. A Reasonable force/ Restrictive Intervention form can be obtained from the DSL and will need completing after the incident and scanned into My concern on the child's file.

Smoking:

Smoking/ e-cigarette or vapers are not allowed on the Naima JPS premises.

APPENDIX 1: Important Contacts

Key Personnel	Name	Telephone No.	Email address
DSL	Gemma Babani	020 7328 2802	gbabani@naimajps.co.uk
Deputy DSL's	Danielle Karr EYFS Corinne Nejad KS2 Tanya Shapiro KS2	020 7328 2802	dkarr@naimajps.co.uk Cnejad@naimajps.co.uk
Safeguarding governor	Alexandra Maurice	020 7328 2802	alexandramaurice@me.com
Chair of governors	Julian Levy	020 7328 2802	
Head	Bill Pratt	020 7328 2802	headmaster@naimajps.co.uk
Local Authority Designated Officer (LADO) Referrals	Referrals will be dealt with by an appropriate Child Protection Advisor	020 7641 7668	LADO@westminster.gov.uk
Tri-Borough Safeguarding and Child Protection Training	Hilary Shaw	07817 365 519	hilary.shaw@rbkc.gov.uk
Tri-Borough Prevent Officer	Pinakin Patel	07970 958 473	pinakin.patel@rbkc.gov.uk
Police		101 or in an emergency 999	
Tri-Borough Multi-Agency Safeguarding Hub (MASH)	David Stoffell	0207641 7274	dstoffell@westminster.gov.uk
Westminster Duty Line		020 7641 4000 (out of hours – 020 7641 2388)	accesstochildrensservices@westminster.gov.uk
NSPCC Emergency Line		0808 800 5000	
NSPCC Whistleblowing Helpline		0800 028 0285	help@nspcc.org.uk

For an expanded contact list for Safeguarding and Child Protection in the Tri-Borough, visit:

https://www.rbkc.gov.uk/lscp/information-professionals-and-volunteers/expanded-safeguarding-and-child-protection-contact-list

APPENDIX 2: Types of Child Abuse

What is abuse, neglect and exploitation?

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

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. 'The impact on children of all forms of domestic abuse, *including where they see, hear or experience its effects.*

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse

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

Sexual abuse

Involves forcing, causing 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, forcing, causing or inciting a child to take part in sexual activities. 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 can 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. Parents/practitioners can refer to Lucy Faithfull Toolkit for further advice.

Sexual Violence and Sexual Harassment

All allegations of sexual violence will be managed in line with the DfE's 'Sexual violence and sexual harassment between children in schools and colleges' September 2021 guidance, including offering ongoing support to both the victim and alleged perpetrator. A summary of this document is included in Keeping Children Safe in Education, September 2026 as Part 5, which gives it statutory status. Further information can be found here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

A report must be kept on My Concern of the allegation and any subsequent findings and discussions.

Sexual violence and sexual harassment is not acceptable and will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'. Sexual violence and sexual harassment can happen outside school premises and online. The school will decide if a referral is needed, should sexual violence or harassment arise or try to manage it through our school behaviour policy.

Neglect

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

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

It should be understood that children can also be abused by Honour or faith-based abuse Violence, Forced Marriage or Female Genital Mutilation. Where children have suffered Abuse, neglect, exploitation and modern slavery or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working

with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the Designated Safeguarding Lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation.

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, *including where they see, hear or experience its effects*. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Operation Encompass – Domestic Abuse Notifications

As part of Operation Encompass, the Police have a legal duty to notify a child's educational setting and the local authority where they have reason to suspect a child may be a victim of domestic abuse, whether connected to a household, present at the time Police attended or not, and whether they are in the household temporarily or permanently. While there are no new responsibilities on schools, they are in a uniquely supportive position for some children to provide timely, informed support.

APPENDIX 3: Indicators of Child Abuse

Indicators of Abuse

Neglect

The nature of neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on child protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment.

NSPCC research has highlighted the following examples of the neglect of children under 12

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if you're worried a child is being abused* 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the designated person/child protection co-ordinator.

Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated
- Looking sad, false smiles

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional Abuse

The nature of emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents.
Emotional abuse is difficult to define, identify/recognise and/or prove.
Emotional abuse is chronic and cumulative and has a long-term impact.
All kinds of Abuse, neglect, exploitation and modern slavery have emotional effects although emotional abuse can occur by itself. Children can be harmed by witnessing someone harming another person – as in domestic violence.

It is sometimes possible to spot emotionally abusive behavior from parents to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of Emotional Abuse

Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical Abuse

The nature of physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g., shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.
A body map (Appendix 6) can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face).
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped).
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head.
- Bruises on the back, chest, buttocks, or on the inside of the thighs.
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette.
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the social context of the school or college, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adult's words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

Sexual Abuse

The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, people working with the child in school, faith settings, clubs or activities. Children can also be subject to Child Sexual Exploitation.

Characteristics of child sexual Exploitation:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic

- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

Indicators of sexual exploitation

Physical observations

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic
- itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations

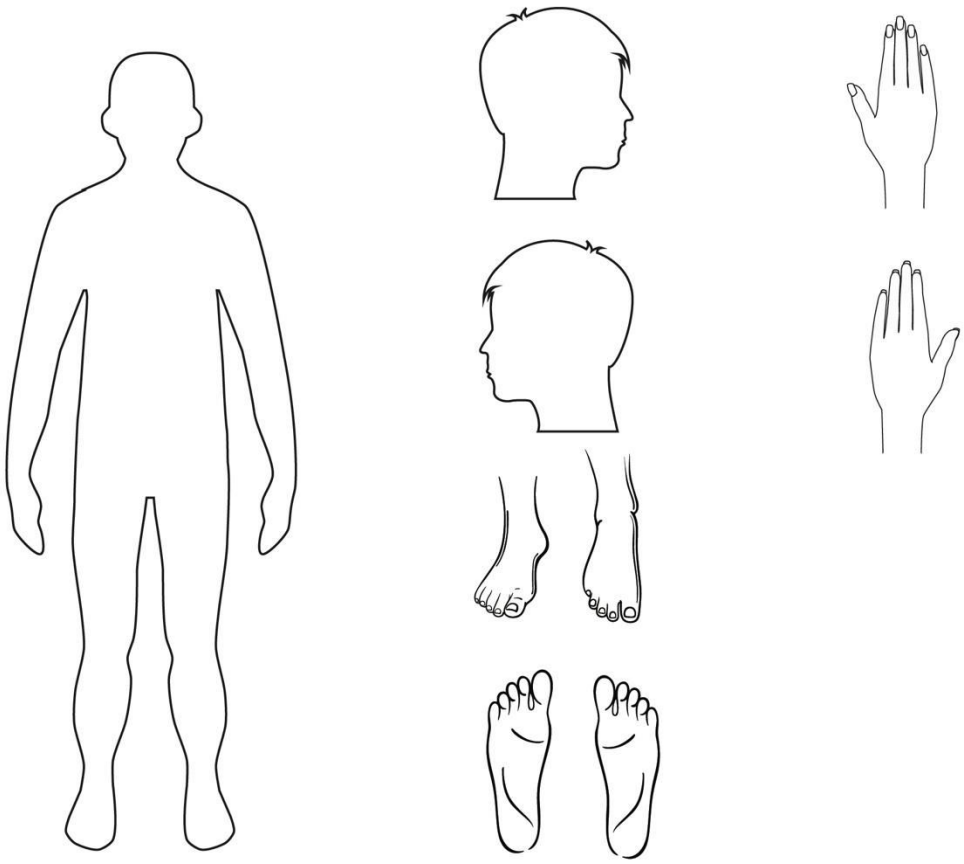
- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour, Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

APPENDIX 4: Related Safeguarding policies

- Staff Code of Conduct
- Promoting Positive Behaviour Policy
- Complaints Policy
- Anti-Bullying Policy
- Whistleblowing Policy
- Learning Support Policy
- Missing Child Policy
- Safer Recruitment Policy
- Allegation of Abuse Against Staff Policy
- Staff Discipline Policy
- Social Media Policy
- Data Protection/Child- on -child abuse Policy
- Child-On-Child abuse Policy and procedure (see appendix 14)
- Attendance & Children Missing in Education
- Reasonable force policy
- Positive touch policy
- Acceptable Use policy
- Online Safety policy
- Mobile phone policy
- Emotional Health and Wellbeing Policy
- Mental Health Policy
- Working Together to Improve School Attendance 2024
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2025)
- Restrictive Intervention Policy

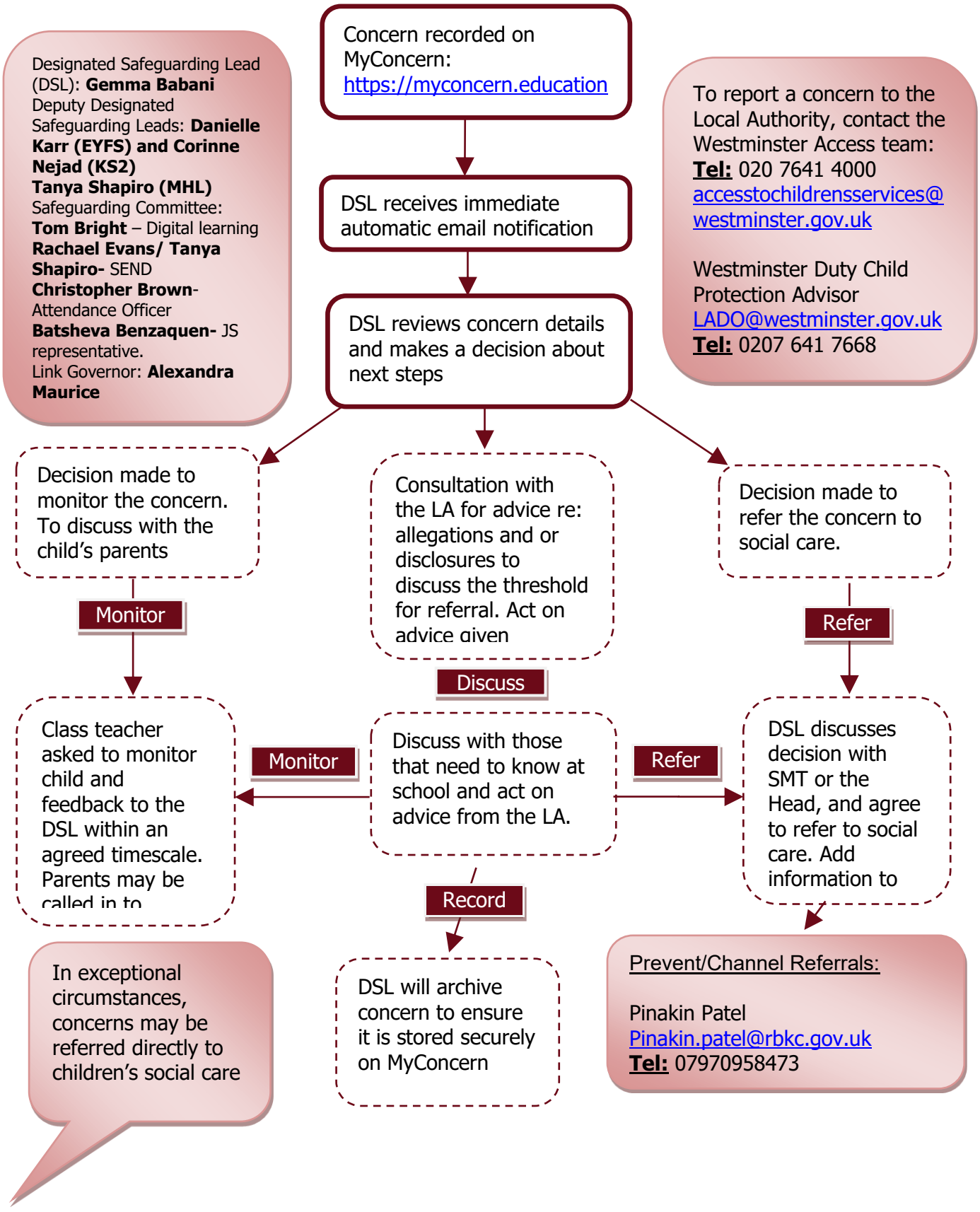
APPENDIX 6: Safeguarding Concern Form, Part B

Should you have a concern regarding a visible injury to a child, use the body diagram below to indicate the area of the injury. **Only record injuries that you can obviously see.** Please ensure you act in a timely manner when reporting concerns, especially if there an injury is noted.



Any additional information

APPENDIX 7: Safeguarding Concern Flowchart



APPENDIX 8: Preventing Radicalisation and Extremism

"Safeguarding children and young people from radicalisation is no different from safeguarding them from other forms of harm" - The Prevent Strategy 2015

What is Prevent?

The threat we face from terrorism is real and the Prevent strategy recognises that we can't arrest our way out of the problem. The Prevent strategy therefore aims to stop people becoming terrorists or supporting terrorism.
The focus of Prevent is on the significant threat posed by international terrorism and those in the UK who are inspired by it. But it is also concerned with reducing threats, risks and vulnerabilities posed by domestic extremists such as those from the far right and far left, extreme animal rights activists and those involved in Northern Irish related terrorism.
Prevent is supported by three objectives:

- Responding to the ideological challenge of terrorism and the threat we face from those who promote it (ideology);
- Preventing people from being drawn into terrorism and ensure that they are given appropriate advice and support (individuals); and
- Working with sectors and institutions where there are risks of radicalisation which we need to address (institutions).
-

If you suspect it, report it.
The school will carry out a risk assessment for Prevent.

The National Counter-Terrorism Strategy (CONTEST)

The Government's counter-terrorism strategy (CONTEST) has four areas of work:

- Pursue: to stop terrorist attacks;
- Prevent: to stop people becoming terrorists or supporting terrorism;
- Protect: to strengthen our protection against a terrorist attack; and
- Prepare: to mitigate the impact of a terrorist attack.

Click here for: more information about CONTEST

Safeguarding Referrals: Channel and Prevent Case Management
One of the key requirements of the Prevent Duty is that staff know how to identify people at risk of radicalisation or extremism and the safeguarding pathways they should use. If you are concerned that an individual may be at risk of radicalisation, you should treat this as you would any other safeguarding issue; and escalate it using your normal, internal procedures, such as informing your safeguarding lead and/or Local Authority DO.
If a referral is then made to the Prevent team, and it is determined that there are concerns around radicalisation and violent extremism in relation to the referred individual, they can be supported through either Channel or Prevent Case Management processes.

Channel

What is Channel?

Channel is a voluntary, confidential support programme and is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremism and/or terrorism. Channel works in a similar way to other safeguarding partnerships such as case conferences for children in need. Channel is a pre-criminal process that is designed to support vulnerable people at the earliest possible opportunity, before they become involved in illegal activity.

Who can make a referral to Channel?

Referrals to Channel come from a wide range of partners including education, health, youth offending teams, and social services. When referrals are received, they are screened for suitability by the police and Council Prevent teams. If a referral is considered to be suitable, it will be discussed at the Channel Panel meeting.

How does Channel work?

Each Channel Panel is chaired by a Local Authority and brings together a range of multi-agency partners to collectively assess the risks in relation to an individual and decide whether a support package is needed. The panel may include statutory and non-statutory partners, as well as lead safeguarding professionals.
If the panel feels that an individual who has been referred would benefit from support; a bespoke package of support will be tailored for that individual, based on their particular needs and circumstances.
When an individual is referred to Channel, the referrer (or an appropriate person from the referring institution) will be invited to attend the Channel Panel meeting. Similarly, other professionals who are working with an individual will also be invited to attend. This partnership approach ensures that the people who work most closely with vulnerable individuals, and who best understand their specific needs and risks have a key role to play in developing support packages for them.

Extremism

If you concerned that a child, young person and/or their parents may hold extremist views or are at risk of being radicalised you have a duty to ensure that they receive support to protect them from being drawn into terrorism.

APPENDIX 9: Dealing With Disclosures

All staff should:
A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child. Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.
All staff should know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the right to make a referral to the police or social care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home.

Guiding principles, the seven R's

Receive
- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said and take it seriously.
- Make a note of what has been said as soon as practicable.

Reassure
- Reassure the pupil, but only so far as is honest and reliable.
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential.'
- Do reassure e.g. you could say: "I believe you", "I am glad you came to me", "I am sorry this has happened", "We are going to do something together to get help."

Respond
- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court.
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible.
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff.

Report
- Share concerns with the Designated Safeguarding Lead as soon as possible
- If you are not able to contact your Designated Safeguarding Lead, and the child is at risk of immediate harm, contact the children's services department directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration.

Record

- If possible make some very brief notes at the time, and write them up as soon as possible.
- Keep your original notes on file.
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- Complete a body map to indicate the position of any noticeable bruising.
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.

Remember

- Support the child: listen, reassure, and be available.
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
- Try to get some support for yourself if you need it.

Review (lead by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses are identified in the procedure? Have these been remedied?
- Is further training required?

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following the report being made. If they do not receive this information they should be proactive in seeking it out.

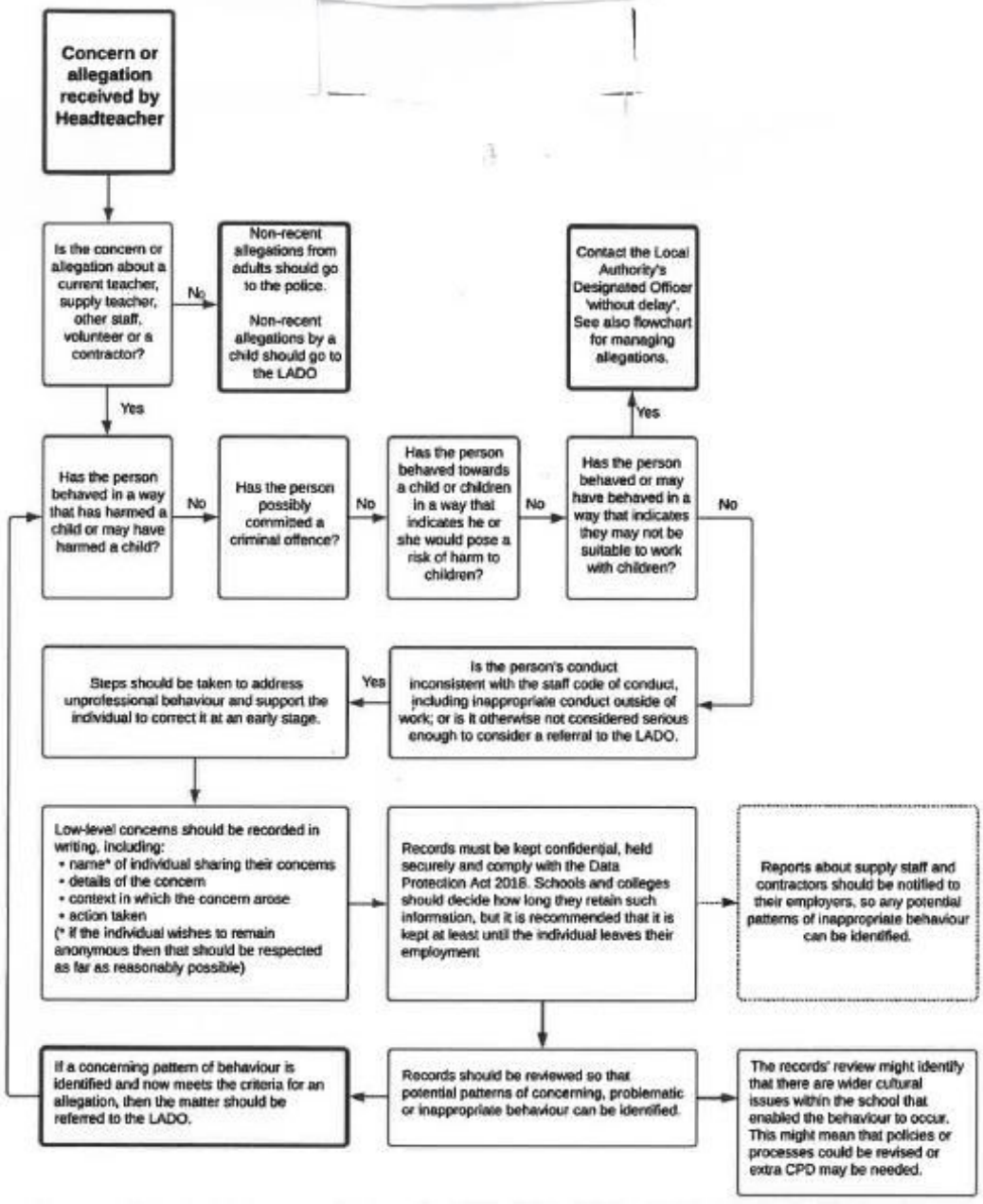
If they have concerns that the disclosure has not been acted upon appropriately they might inform the safeguarding governor of the school and/or may ultimately contact the Children's Services Department.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases additional counselling might be needed and they should be encouraged to recognise that disclosures can have an impact on their own emotions.

APPENDIX 10:

6. Process to follow when a Low-Level Concern is raisedKey Reference Document



When it has been raised by a third party, the head should collect as much evidence as possible by speaking where possible with that person who raised the concern, to the individual involved and to any witnesses. The rationale for all decisions and actions taken will be recorded.

APPENDIX 11 Useful Resources

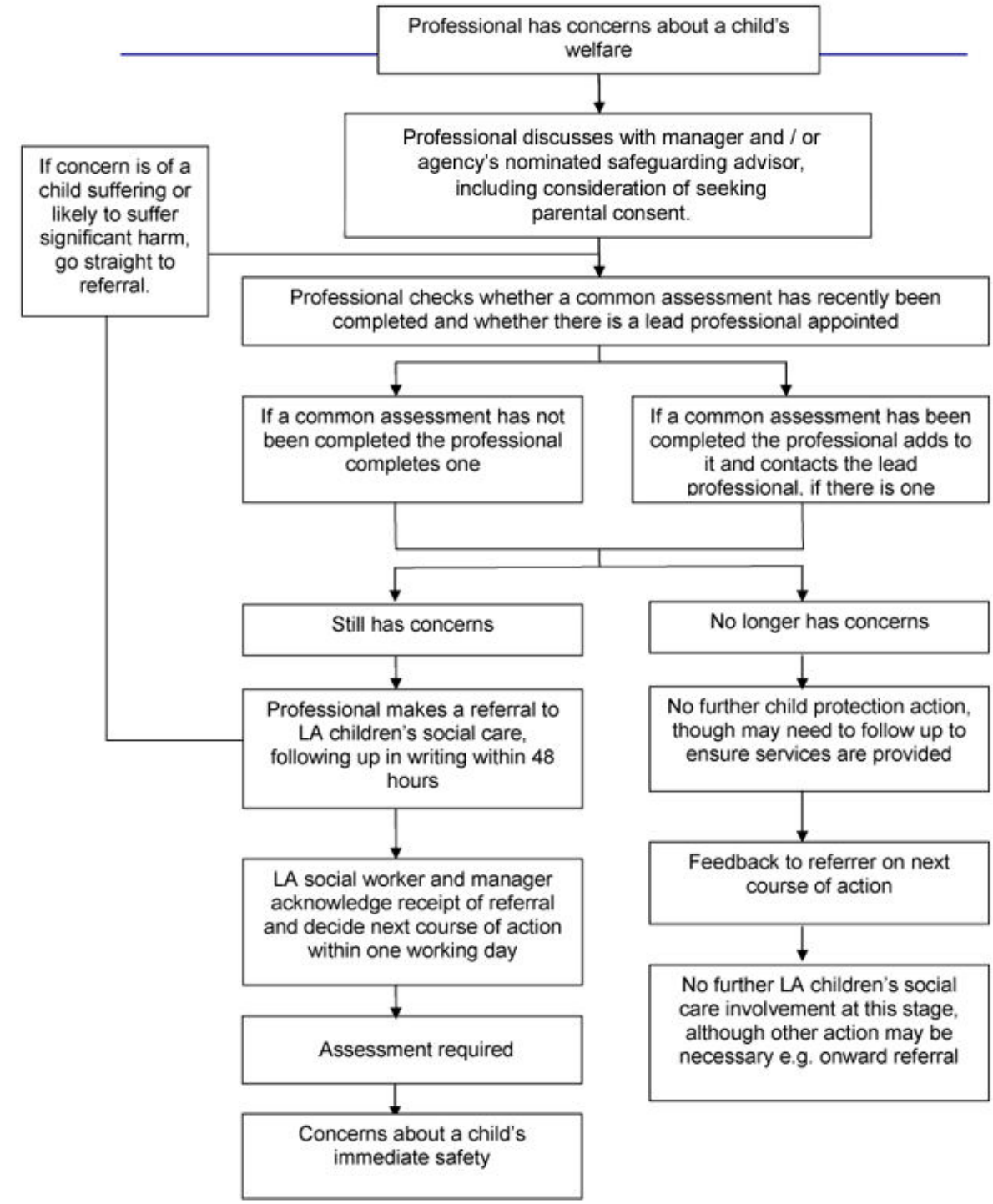
Name	Website Address	Description
Tri-Borough Local Safeguarding Partners (LSP)	https://www.rbkc.gov.uk/subsites/lscp.aspx	Coordinates safeguarding work across Westminster, Kensington and Chelsea, Hammersmith and Fulham
NSPCC	https://www.nspcc.org.uk/preventing-abuse/safeguarding/	Advice on what organisations need to do to protect children from harm
NSPCC Serious Case Reviews 2016	https://www.nspcc.org.uk/preventing-abuse/child-protection-system/case-reviews/2016/	A list of serious case reviews published in 2016 to identify how organisations are THE
CEOP	https://ceop.police.uk/	Works to protect children online and offline
Think U Know	https://www.thinkuknow.co.uk/Teachers/	Provides resources, training and support for professionals who work with children
Childnet International	http://www.childnet.com/	Helps to make the internet safe for children
Get Safe Online	https://www.getsafeonline.org/safeguarding-children/	Provides guidance on safeguarding children online
CASPAR	http://casparnews.tumblr.com/	NSPCC's Current Awareness Service for Practice, Policy and Research
Children's Commissioner	http://www.childrenscommissioner.gov.uk/	Practical tips for Primary Schools on safeguarding
Streetwise	http://www.streetwisegb.org/	Streetwise works nationally with Jewish schools and Community organisations, enhancing the personal safety and personal development of young Jewish people to support their safe, physical, and emotional wellbeing
CST	https://cst.org.uk/	CST is Community Security Trust, a charity that protects British Jews from antisemitism and related threats.

NAIMA

Jewish Preparatory School

NAIMA
Jewish Preparatory School

APPENDIX 13: Tri-borough Referral Process



APPENDIX 14: CHILD- ON- CHILD SEXUAL VIOLENCE AND SEXUAL HARRASSMENT POLICY AND PROCEDURE

While it is recommended that child- on- child abuse is part of the Safeguarding & Child Protection Policy, due to the sensitive nature and specific issues involved with child -on -child abuse it is a separate Policy from the main Safeguarding & Child Protection Policy.

Children can abuse other children inside and outside school and online. This is generally referred to as Child- on -Child abuse and can take many forms. This can include (but is not limited to) abuse within intimate partner relationships; bullying (cyberbullying prejudice-based and discriminatory bullying); sexual violence and sexual harassment; causing someone to engage in sexual activity without consent; consensual and non-consensual sharing of nude and semi-nude images (self-generated intimate images and/or videos including those generated using AI e.g. deepfakes)-; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence, rituals, harassment and violence, discriminatory behaviour, including racism and faith-targeted abuse. Child-on-child abuse can sometimes be hidden abuse and just because there may be no reports, it does not mean it is not happening. There are new requirements for staff to see child on child abuse as a risk to both victim and alleged perpetrator, and that staff should recognise this is preventable with "timely, evidenced based support" preventing children from going on to commit abuse or violence. There is recognition that child on child abuse is not always from boys to girls, although it remains more likely and an explicit recognition that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. Child-on-child abuse is preventable and it may involve serious physical harm or threats involving weapons.

Victims must be reassured that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim will ever be made to feel ashamed for making a report. Children may not feel ready or know how to tell of abuse – staff must have a professional curiosity; how sharing of nude and semi-nude images will be dealt with; (bullying -including cyber-bullying, prejudiced-based and discriminatory bullying, including racism and faith-based prejudice), abuse in intimate personal relationships between peers including physical, sexual emotional abuse, stalking and financial exploitation.

Staff should be vigilant at all times and speak to the DSL and record any concerns on MyConcern. They should also challenge abusive behaviours between peers to minimise the risk of child-on-child abuse. When logging a concerns, staff should record a clear and comprehensive summary, details of how the concern was resolved and followed up and the final outcome. All allegations of child-on-child abuse will be recorded, investigated and dealt with. There is zero-tolerance to this type of behaviour.

At Naima JPS

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm not only by adults in the school, but also by other children. With full consideration to the impact on that individual child's emotional and mental health and well-being. We have a zero-tolerance approach to abuse, it will not be tolerated in our school or passed off as "banter", "just having a laugh" or "part of growing up"; as this could lead to a culture of unacceptable behaviours (including misogyny) and unsafe environments.

We recognise that some children will sometimes negatively affect the learning and wellbeing of others. As a school we will minimise the risk of allegations against other pupils by:

- Providing a developmentally appropriate PSHEE/RHE syllabus which develops children's understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any child 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 children identified as being at risk. Possibility of workshops run by our school counsellor.

The process for minimising Child –on- Child Abuse (*including harassment and violence)*

In the broadest sense, it is hoped that the school's Pastoral, Academic and Curriculum both Jewish and Secular aims to create and sustain an environment that helps to minimise the risk and occurrence of child -on -child abuse. The school also looks to take a proactive, preventive and educative approach to safeguarding issues with its staff and pupils. Opportunities are sought to give teaching and learning opportunities to our pupils, within the context of PSHEE/RHE. There are many possible avenues for such education to take place, including education about appropriate behaviour and in JS keeping the laws of being a good Jewish child. These often take place in sessions such as; assemblies, NSPCC sessions, PSHEE/RHE sessions, tutorial sessions, online safety sessions during computing.

We recognise the challenge that children face in talking about such issues and so learning opportunities should aim to develop confidence in our pupils so that they feel they can communicate about safeguarding issues, including asking questions and disclosing concerns.

We strongly believe that other underpinning preventive learning about issues, such as consent, healthy relationships, online safety, recognising abusive and coercive behaviour, covered in the avenues outlined above, may help to support learning about abuse.

How can a child who is being abused by their peers be identified?

All staff should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

(a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected; (b) physical injuries; (c) experiencing difficulties with mental health and/or emotional wellbeing; (d) becoming withdrawn and/or shy; experiencing headaches, stomach aches, eating issues, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much; (e) broader changes in behaviour including alcohol or substance misuse; (f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age; (g) abusive behaviour towards others.

Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards.

The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of child-on-child abuse, a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others. The gendered nature of child- on- child abuse (i.e. that it is more likely that girls will be victims and boy's perpetrators), but that all child –on- child abuse is unacceptable and will be taken seriously.

Managing allegations of abuse by one pupil against another at Naima JPS (these may be of a Safeguarding nature)

Some allegations may be of such a serious nature that they may raise safeguarding concerns. These allegations are most likely to include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is also likely that incidents dealt with under this policy will involve older children and their behaviour towards younger children or those who are vulnerable. Any cases of suspected abuse by one or more pupil against another pupil must be referred to the DSL, who will advise on the best course of action.

There is no clear boundary between incidents that should be regarded as child- on -child abuse and incidents that would be considered as bullying, sexual experimentation and so on. Staff should use their professional judgement in these matters. However, we would consider a child or young person's behaviour as being abusive if:

- there is a large difference in power between the young people concerned (e.g. age, size, ability, development); or
- the perpetrator has repeatedly tried to harm one or more other children; or
- there are concerns about the intention of the alleged perpetrator.

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

Types of child- on- child abuse is most likely to include, but may not be limited to:

- Physical abuse
    - Violence, particularly pre-planned
    - Forcing others to use drugs or alcohol
    - Biting, hitting, kicking and pulling hair

- Emotional abuse
    - Blackmail or extortion
    - Threats and intimidation
    - Bullying, name calling, homophobia
    - verbal abuse such as persistent criticism, belittling or name calling

- Sexual abuse
    - Indecent exposure, indecent touching or serious sexual assaults, inappropriate sexual language
    - Forcing others to watch pornography or taking part in sexting
    - penetration by an object

- Sexual exploitation
    - Encouraging other children to engage in inappropriate sexual behaviour (for example, having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight)
    - Photographing or videoing other children performing indecent acts

Sexting

Children are not allowed to bring mobile phones into school. However, they may have access to mobile phones, iPads and so on at home. In the event of any incidences of sexting or activity which could be construed as such, Naima JPS will refer to Governmental guidance issued in January 2017, which is available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

Cyber bullying

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone for the same reasons as stated above.

It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour.

Upskirting

This 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, or to cause the victim humiliation, distress or alarm.

Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.
The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

Where a pupil's behaviour causes significant harm to other pupils, for example through violent or sexually abusive behaviour, the school will refer the child to Children's Services under the *Children Harming Others* protocol, available at:
http://www.londoncp.co.uk/chapters/ch_harm_others.html

The Procedure used at Naima JPS when dealing with Child- on- Child Abuse

Guidelines for staff

- in an emergency take the action necessary to help the child, if necessary call 999
- report your concern as soon as possible to the DSL, definitely by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern
- Children are reassured that they are taken seriously and will be supported and kept safe. They should be reminded that they are not creating a problem for reporting sexual abuse, sexual violence or sexual harassment.

If you are asked to investigate further:

- Hear what the victim has to say and really listen. Allow the victim to express feelings at length.
- Convene a meeting (or ask the class teacher or Head) of those involved in the bullying, including the perpetrator(s) and some observers/bystanders. The victim must be absent.
- Explain that there is a problem for the victim and recount his/her story in a clear way so that the feelings of distress are described.
- Extract the nature of events. Gather all the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten
- Gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?)
- Determine the way forward. This may involve reconciling the bully and the bullied and get an apology for the children bullied.
- Attempt to change the behaviour of the bully (bullies).
- Provide support to the children involved, usually with our school counsellor.

In all cases of child- on- child abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner.

Key points for staff to remember when taking action are:

- The DSL will make contact with the MASH team to gain further advice and how to proceed. The school will not investigate allegations before first speaking to the Designated Officer of the Local Authority.

- Always record any incident of /child- on -child abuse, whether physical or not, on My Concern of the perpetrator(s) and the victim(s). Parents of all children involved will need to be informed.

- If child- on -child abuse is repeated, parents of both bully and victim will be invited to come to school to discuss the situation with the class teacher and the Head. School and home can together agree possible strategies for behaviour modification in

respect to the bully. An agreed action plan may involve outside agencies such as an education psychologist. The plan will be monitored to ensure that desired improvements take place. A record must be kept of the meeting, noting the exchange of views and information especially any action to be taken by either school or parents.

- If child- on -child abuse persists, the Head and Hon. Principal may require that the child be suspended or removed from the school. If the child is suspended, upon returning he/she will be asked to agree a behaviour contract which sets out clearly expectations in terms of conduct. Incidences of serious misdemeanours and punishments are recorded on My Concern for more serious disciplinary offences.
- Children should be made aware of the standards of behaviour expected as described in the Promoting Positive Behaviour Policy, and all members of staff need to be consistent in their demands and expectations of children.
- Children should be made fully aware of the school's *Core Principles* and how they apply to their behaviour in school.
- The School may consider a referral to outside agencies including CYPMHS (Children and Young People's Mental Health Service)
- The School may complete a CAF (Common Assessment Framework) to ensure that outside services are made available to the child or young person.

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

Notifying parents

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

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from Children's Social Care and/or the police before parents are contacted.

Confidentiality and sharing information

All Naima JPS staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

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

Child protection information will be stored and handled in line with the Data Protection Act 1998.
Information sharing is guided by the following principles. The information is:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure.

Record of concerns and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. In most cases on our school system 'My Concern'.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

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

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

This policy should be read in conjunction with other school policies including: Safeguarding and Child Protection, Promoting Positive Behaviour Policy, Mental Health Policy.

APPENDIX 15: THE DESIGNATED SAFEGUARDING LEAD JOB DESCRIPTION.

Annex B: Role of the Designated Safeguarding Lead (taken from Keeping Children Safe in Education 2026).

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 a 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 Microsoft Teams 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. To ensure continuity of safeguarding responsibilities, schools should implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. This could, for example, include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

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 (SENCOs), 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, and
• 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 college.158 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, and
- a note of any action taken, decisions reached and the outcome They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice set out in Parts one and 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 (SENCOs) or the named person with oversight for SEND in colleges, are aware as required.

Raising awareness

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 particularly where the information would support an assessment of risk to others in the school as well as the individual pupil 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, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives. It would be good practice for a conversation to take place between the designated safeguarding leads at both settings, where there are issues or concerns.

The designated safeguarding lead should:

• ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part-time staff
• ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
• ensure the child protection policy is available publicly and parents 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 (and any deputies) 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 family help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements159 • 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 carers160 • 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 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, and 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 (and deputies) 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 (and deputies) 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 laws, and • be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.