



**St. Paul with St. Luke
& St. Saviour's**

CoE Primary School Federation

CHILD PROTECTION & SAFEGUARDING POLICY

**St Paul with St Luke &
St Saviour's Federation**

Last Reviewed: 3rd September 2025

Next Review: 1st September 2026

Structure Guide Colour Code
Updates for 2025/26

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Jesus said: 'I have come that you may have life in all its fullness' (John 10:10). He calls us to a full life in mind, body, heart and spirit. Therefore, we believe the purpose of education is to nurture and enable every child to flourish and shine as a unique child of God.

Action taken to promote the welfare of children and protect them from harm is everyone's responsibility. 'Everyone who comes into contact with children and families has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.' Keeping Children safe in Education, September 2025.

St Paul with St Luke and St. Saviour's are both vibrant schools that serves a diverse population including all religions, faiths, cultures, family models and backgrounds. Staff working in our schools cannot make assumptions based on their own experience of life to date. They must maintain an open mind whilst being vigilant to what is in the best interests of the child and they must maintain an attitude of 'it could happen here' where safeguarding is concerned.

We recognise that no single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy has been developed to ensure that all adults are working together to safeguard and promote the welfare of children. It describes the management systems and arrangements in place to create and maintain a safe learning environment for all pupils and staff. It identifies actions that should be taken to address any concerns about pupil welfare.

The DSLs or, in their absence, the member of staff deputising for them, have the ultimate responsibility for safeguarding and promoting the welfare of pupils.

St Paul with St Luke and St Saviour's safeguarding policies include child protection, staff conduct, safer recruitment, allegations against staff, complaints, pupil behaviour and online safety.

The safeguarding policy can be found on the schools' websites, a printed copy in the offices and referred to in the handbook. The policy is reviewed annually unless it changes via statute.

Safeguarding policies will be reviewed annually unless an incident, new legislation or guidance calls for the need for a review.

We believe that the school should provide a caring, positive, safe and stimulating environment which promotes all pupils' social, physical, emotional and moral development.

Therefore, the governors and staff fully recognise the contribution the school makes to safeguarding children. We recognise that the safety and protection of all pupils is of paramount importance and that all staff, including volunteers, visitors and governors, have a full and active part to play in protecting pupils from harm.

All procedures have been written in accordance with Keeping Children Safe in Education 2025, Working Together to Safeguard Children 2023 and reflect local safeguarding arrangements including the Tower Hamlets Safeguarding Children Partnership Supplementary Guidance documents on Child Protection Procedures and the Management of Allegations and Concerns that do not meet the Harm Threshold.

CORE SAFEGUARDING PRINCIPLES

- The welfare of the child is paramount and underpins all discussions, decision making, and actions taken at the school.
- All concerns shared and reported by children will be taken seriously.
- All children have the right to have a life free from harm, regardless of age, gender, ability, culture, race, language, religion or sexual identity, all have equal rights to protection. This includes children's lives in digital and online environments.
- The child's wishes and feelings will always be taken into account at the school when determining what action to take and what support to provide.
- All staff including supply staff, contractors and volunteers have an equal responsibility to act immediately on any suspicion or concern shared that may suggest a child is at risk of harm or has been harmed.
- The Designated Safeguarding Lead will ensure that all pupils and staff involved in safeguarding and child protection issues will receive appropriate support.

These 6 core principles are embedded within the school's safeguarding arrangements; underpin the federation's safeguarding policies, procedures and systems; and pervade the whole school approach to safeguarding at St. Paul with St. Luke and St. Saviour's.

PURPOSE OF POLICY

- To ensure all pupils on the school roll are effectively safeguarded including those pupils in Alternative Provision placements.
- To provide all staff with key information to enable them to identify safeguarding concerns and know what action to take in response.

- To ensure consistent good practice throughout the school.
- To demonstrate the school's commitment to safeguarding to the whole school community: pupils, parents and other partners.

SAFEGUARDING LEGISLATION AND GUIDANCE

The following legislation and government guidance have informed the content of this policy:

Legislation:

- Section 175 of the Education Act 2002 (Local maintained schools only)
- Section 157 of the Education Act 2002 (Independent schools only, including academies and Free Schools)
- The Education (Independent School Standards) Regulations 2014 (Independent schools only, including academies and Free Schools)
- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- Education and Training (Welfare of Children) Act 2021 (16-19 Academies and Independent Training Providers)
- Human Rights Act 1998
- The Equality Act 2010
- Data Protection Act 2018 and the GDPR
- The Safeguarding Vulnerable Groups Act 2006

Guidance

- Working Together to Safeguard Children 2023 (HM Government December 2023, Updated 12th June 2025)
- [Keeping Children Safe in Education 2025 \(Department for Education, 1st September 2025\)](#)
- Information Sharing: advice for practitioners providing safeguarding services (Department for Education, 2015, Updated May 2024)
- What to do if you're worried a child is being abused 2015 (Department for Education, March 2015)
- Early Years Foundation Stage Statutory Framework [for group and school-based providers \(Updated 1st November 2024\)](#)
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014)
- The Teacher Standards 2012

TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP SUPPLEMENTARY SAFEGUARDING GUIDANCE

The following Pan-London and Tower Hamlets Safeguarding Children Partnership guidance has informed the content of this policy:

- London Child Protection Procedures revised 7th Edition (London Safeguarding Children Board, [31st March 2025](#))
- Tower Hamlets Safeguarding Children Partnership Levels of Need Guidance (September 2023)
- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Child Protection Procedures - [September 2025](#)
- Tower Hamlets SCP LADO Procedures and Flowchart re Allegations made against staff working in the children's workforce - Information about reporting and managing allegations
- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Managing Allegations of Abuse against Staff and Concerns that do not meet the harm threshold – [September 2025](#)
- Tower Hamlets SCP Multi-Agency Escalation and Resolution Policy

TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP

The Children Act 2004 as amended by the Children and Social Work Act 2017 has brought about the establishment of the Tower Hamlets Safeguarding Children Partnership (THSCP). The Partnership coordinates the work of all agencies and ensures that this work is effective in achieving the best outcomes for Tower Hamlets children. The three statutory safeguarding partners have published arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. More information about the Tower Hamlets Safeguarding Children Partnership can be found on the website: www.thscp.org.uk

In accordance with *Working Together to Safeguard Children 2023*, the school is a protective factor for all children especially the most vulnerable and has a pivotal role to play in local multi-agency safeguarding arrangements. The school's contribution, insight and co-operation are vital to the successful delivery of these arrangements. The school has been named as a 'relevant agency' and as such is under a statutory duty to cooperate with the THSCP multi-agency arrangements. This includes responding to safeguarding audits of quality and compliance, as requested by the local authority and/or local safeguarding partners.

The school is committed to engaging with the THSCP multi-agency safeguarding training offer and the borough's Designated Safeguarding Leads Forums, participating in THSCP/LA's Section 175/157 School Safeguarding Audit Cycles, providing key information about children relevant to keeping children safe, participating fully in the Rapid Review process and Child Safeguarding Practice Reviews, and supporting the agreed safeguarding priority areas for 2025-2027, which are Think Family and Adolescent Safeguarding.¹

LOCAL AUTHORITY STRATEGY

In recognition of the school's pivotal role in the local safeguarding system, the implementation of this Child Protection policy and other related policies to safeguard and promote the welfare of pupils, will support the school's continued central contribution in driving improvements in outcomes for children in the borough, an overall objective set out in council strategy including:

- [TH: Is Accelerate: The Tower Hamlets Children and Families Partnership Strategy 2024-2029](#)
- [Tower Hamlets Special Educational Needs, Disabilities and Inclusion Strategy 2024-2029](#)
- [Tower Hamlets Early Help Strategy 2023-25: Leaving No Families Behind: Supporting Access for All](#)
- [VAWG and Women's Safety Strategy 2024-2029](#)
- Tower Hamlets Serious Violence and Exploitation Strategy

KEY DEFINITIONS

Safeguarding and promoting the welfare of children is:

- 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
- preventing the impairment of a child's physical and mental health or development

¹ For more information on the Rapid Review process, Child Safeguarding Practice Reviews and Child Death Reviews, Working Together To Safeguard Children 2023 Chapters 5 and 6 should be consulted. Working Together 2023 paragraphs 76-81, 125-130, and 230-233 provide more information on the expectation of school's role within the safeguarding partnership arrangements. For further information on the THSCP's priority areas, please visit www.thscp.org.uk

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

The phrase 'child protection' refers to the processes followed to protect children who have been identified as suffering or being at risk of suffering significant harm.

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, carers, foster carers, and adoptive parents.

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

ROLES AND RESPONSIBILITIES

The Governing Body have the strategic leadership responsibility for safeguarding arrangements at the school. As a collective body it must have regard to all relevant statutory guidance issued, including the latest version of *Keeping Children Safe in Education*, ensuring that school's safeguarding policies and procedures, including the current Child Protection Policy, are compliant with legislation and statutory guidance, reflect local safeguarding arrangements and are effective for the education setting.

In accordance with the statutory requirement for a named member of the Governing Body to take leadership responsibility for safeguarding at the federation schools the Safeguarding Link Governor is: Aune Turkson-Jones

The Head of School is responsible for ensuring that both school's Child Protection Policy and other safeguarding related policies are communicated to all staff, understood by all members of staff, and followed by all members of staff.

The Designated Safeguarding Lead takes the ultimate lead responsibility for safeguarding arrangements within each school on a day-to-day basis, including online safety and understanding the filtering and monitoring systems and processes in place.

Overriding responsibility for all Safeguarding matters resides with the Executive Headteacher

Safeguarding Link Governor Aune Turkson-Jones Contact: aune@btinternet.com	
St Paul with St Luke	St Saviour's

Designated Safeguarding Lead: Mark Ali	Designated Safeguarding Lead: Tom Dunford-Crozier
Deputy Designated Safeguarding Lead: Fahima Begum Tomas Hall Fanoula Smith Louise Wilcox	Deputy Designated Safeguarding Lead: Tomas Hall Jo Robin Rachel Sablon Fanoula Smith Louise Wilcox

SENDCo: Louise Wilcox

If the DSL is not available then contact the DDSL, including during out of school hours/ term activities. See additional contact details below.

Child Protection duty Line (MASH)	02073643444 02073645006 364 5000
Children's Social Care Out of Hours Team	020 7364 4079
Police Child Abuse Investigation Team	020 8217 6484
Allegations against staff (LADO) Melanie Benzo	Melanie.Benzie@towerhamlets.gov.uk LADO@towerhamlets.gov.uk 0207 364 0677
Prevent Education Officer Iona Karrman Baily	Iona.Karrman-Bailey@towerhamlets.gov.uk 07842301565

The DSL takes the lead on supporting pupils during standard and non-standard transition points and ensuring that relevant information for the safeguarding of these children is shared. This includes ensuring that safeguarding files are sent separate from the main pupil file to the new school within the first 5 days of the child starting there and that appropriate follow-up is done if the school is not receiving safeguarding information from the previous school the child attended.

If the school has not received the safeguarding records for new pupils within the first 5 days of the pupil starting during standard and non-standard transition points, then the school will proactively reach out to the previous school for the transfer of safeguarding files.

All staff should recognise that as frontline workers they are in a **vital** important position to identify concerns early, provide help and support to children, promote children's welfare, and prevent concerns from escalating.

All staff have a responsibility to provide a safe environment in which children can learn.

All staff have a responsibility to report safeguarding concerns immediately to the DSL. A written report must also be recorded on CPOMS within the day of the concern alerting the Head of School, DSL and Deputy/Assistant Head, Deputy DSL.

All members of staff take responsibility for writing up clear and comprehensive safeguarding concerns using the school's safeguarding record system. Through the DSL's oversight safeguarding records include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved, and
- records of any action taken, decisions reached, outcomes and what protective safeguards have been put in place.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or a deputy).

If in doubt about any safeguarding matter, staff should **always** speak to the DSL.

All staff are expected to keep the school values at the core of their daily conduct and understand that they have a legal duty to safeguard the child. Ultimately, the best interests of the child must be at the centre of all decision making, behaviours and action taken in relation to children.

RIGHTS OF THE CHILD

The school upholds the human rights of the child in accordance with the Human Rights Act 1998.² It is unlawful for schools to act in a way that is incompatible with the European Convention on Human Rights. Specifically, the school embeds and upholds the following Convention rights of the child across its safeguarding policies and procedures:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)

² <https://www.equalityhumanrights.com/en/human-rights>

- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination
- Protocol 1, Article 2: protects the right to education.

In accordance with the Equality Act 2010, the school must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Please see the school's Equality Policy. The school is committed to supporting and taking positive action towards children with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race- who may be at a disadvantage and be disproportionately vulnerable.

In fulfilment of the school's Public Sector Equality Duty the school has due regard to the need to eliminate unlawful discrimination, harassment, and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not.

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions, including long term health conditions.
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification, gender assignment or sexuality
- Children vulnerable to child-on-child abuse - including sexual violence and harassment especially girls
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)

- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

As evident in the Serious Case Review Child Q, the school is aware that children from ethnically diverse groups are at risk of adultification whereby their vulnerability as a child is reduced or set aside because of racial bias and stereotypes impacting professional judgement.³ All staff share in the whole school's commitment to ensure equity, diversity and inclusion remain at the centre of the school's safeguarding culture, so that all children receive the care, support, and protection they have the right to receive.

The school shares the London Borough of Tower Hamlet's commitment to being an anti-racist borough and to tackle and eliminate race discrimination. The council's Black, Asian, and Minority Ethnic Inequalities Commission (2021) concluded that racism still exists within institutions and structures in the borough and has developed an action plan to achieve race equality at pace.⁴ The action plan recognises that schools have a powerful and significant role in changing narratives and bringing about social change through education.

We subscribe to the Church of England's vision to celebrate diversity so that all Londoners experience the love of God in Christ. In order to fulfil this vision, we have joined the Anti Racist Network of School in Tower Hamlets. In addition, in order to drive social equality and challenge injustice, we have carefully selected our reading texts across the whole school to ensure the promotion of diversity. Our curriculum has been carefully designed with a view to further promotion of equality and diversity. We ensure all children are represented in leadership roles across the school. [The school along with other safeguarding partners is fully committed to implementing the Tower Hamlets Safeguarding Children Partnership's Anti-Racist Charter \(2025\) across its safeguarding practice.](#)

CHILDREN WHO MAY BE POTENTIALLY MORE AT RISK OF HARM

All staff should recognise that all children are vulnerable but that some children may be more vulnerable than others and at more risk of harm. Children known to a Social Worker, Looked After Children and Care Leavers are likely to have suffered abuse at some point in their childhood and may be more vulnerable to further abuse including exploitation. Staff need to be aware that other children who may be potentially more at risk of harm include

³ <https://chscp.org.uk/wp-content/uploads/2022/03/Child-Q-PUBLISHED-14-March-22.pdf>

⁴ https://www.towerhamlets.gov.uk/lgnl/community_and_living/Inequality-Commission/Black-Asian-and-Minority-Ethnic-Inequalities-Commission.aspx

A Child 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 showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves;
- has returned home to their family from care; and
- is at risk of so-called honour based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day.

Staff must be more vigilant in their day-to-day work with children when the above vulnerabilities are known and report all concerns immediately to the Designated Safeguarding Lead.

CHILDREN IN NEED OF A SOCIAL WORKER

Children who have been allocated a social worker may have experienced abuse including neglect and belong to a family that has many complex circumstances. Staff should recognise that these children will have experienced adversity and trauma that can leave them vulnerable to further harm, as well as educationally disadvantaged, and have a negative impact on their attendance, learning, behaviour and mental health.

When making decisions about safeguarding, carrying out risk analysis, making a safeguarding response to concerns such as unauthorised and persistent absence, and providing pastoral and academic support, the school will take seriously the fact that the child in need of a social worker will require enhanced pastoral and academic support alongside that provided by statutory services. School is also committed to providing further pastoral and academic support to children who have had historic contact with a Social Worker, in recognition that the abuse and trauma is likely to have an impact on the child beyond the duration of the involvement of statutory services. The school will co-operate with the Virtual School, which now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children known to a social worker.

Children may need a social worker due to safeguarding or welfare needs. Children who have been allocated a social worker may have experienced abuse, neglect and belong to a family that has many complex circumstances. Staff should recognise that these children will have experienced adversity and trauma that can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. When making decisions about safeguarding, analysing risks and providing pastoral and academic support, the school will take seriously the fact that the child in need of a social worker will require enhanced support alongside that provided by statutory services.

School is also committed to providing further pastoral and academic support to children who have had historic contact with a Social Worker, in recognition that the abuse and trauma is likely to have an impact on the child beyond the duration of the involvement of statutory services. Staff with concerns about a child who has previously had social worker intervention should refer immediately to the DSL and safeguarding team, who will consider next steps and appropriate additional support.

CHILDREN REQUIRING MENTAL HEALTH SUPPORT

All staff have an important role in supporting the mental well-being of children and to identify behaviour that may suggest a child is experiencing mental health problems.⁵ All staff

⁵ For further information staff should read relevant government guidance including [Promoting and supporting mental health and wellbeing in schools and colleges](#) (2022) and [Mental Health and Behaviour in Schools](#) (2018)

need to recognise that mental health may be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should be aware of the trauma and mental health impact on a child who has had adverse childhood experiences including abuse, bereavement and separation of parents. Staff should also be aware that the pandemic has had a negative impact on the mental health of many children, some of whom have never previously experienced difficulties with their mental health. However, all staff should be clear that only appropriately trained professionals should attempt to make a diagnosis of a mental health difficulty.

As a federation, we are committed to supporting the emotional health and wellbeing of our pupils and staff.

We have a supportive ethos and we try to follow the school's values of care, respect and inspire at all times. We aim to provide an excellent education that enables children to flourish in their potential as a child of God and where all souls thrive.

At our school, we know that everyone experiences life challenges that can make us vulnerable and at times, anyone may need additional emotional support. We take the view that positive mental health is everybody's business and that we all have a role to play.

At our school we:

- help children to understand their emotions and feelings better
- help children feel comfortable sharing any concerns or worries
- help children socially to form and maintain relationships.
- promote self-esteem and ensure children know that they count.
- encourage children to be confident and 'dare to be different'
- help children to develop emotional resilience and to manage setbacks.

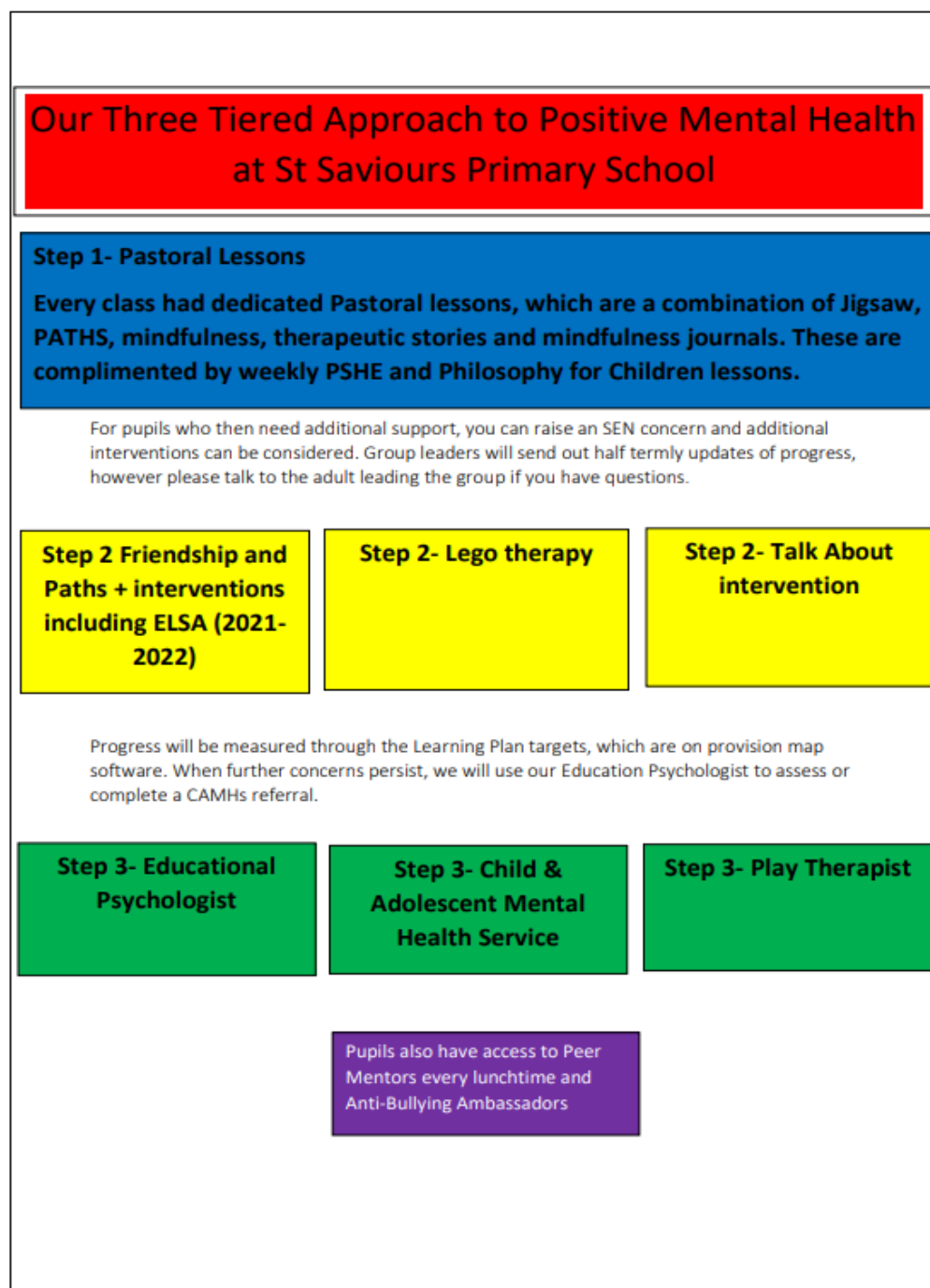
We promote a mentally healthy environment through:

- Promoting our school values and encouraging a sense of belonging.
- Promoting pupil voice and opportunities to participate in decision-making.
- Celebrating academic and non-academic achievements
- Providing opportunities to develop a sense of worth through taking responsibility for themselves and others
- Providing opportunities to reflect.
- Access to appropriate support that meets their needs

We pursue our aims through:

- Universal, whole school approaches
- Support for pupils going through recent difficulties including bereavement.

- Specialised, targeted approaches aimed at pupils with more complex or long-term difficulties including attachment disorder or trauma.



Whilst all staff have a responsibility to promote the mental health of students, staff with a specific, relevant remit include:

Mental Health First Aiders	
St Paul with St Luke: Mark Ali	St Saviour's: Tom Dunford-Crozier Rachel Sablon

LOOKED AFTER CHILDREN, PREVIOUSLY LOOKED AFTER CHILDREN & CHILDREN IN KINSHIP CARE ARRANGEMENTS

The most common reason for children becoming looked after by the Local Authority is as a result of abuse including neglect.

Staff need to have the skills, knowledge and understanding to safeguard Looked After Children and Previously Looked After Children in recognition of their heightened vulnerability.

The DSL and Designated Teacher will work **together alongside** relevant agencies and take immediate action to safeguard and provide support to this vulnerable group of children. The designated teacher will work with the Virtual School to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan.

Children who are looked after, or have left care (through adoption, special guardianship or child arrangement orders or who were adopted from state care outside of England or Wales) remain vulnerable, both for safeguarding and child protection reasons and, consequently, often underachieve in their learning. It is essential that we work closely with additional agencies to support all children within the federation who are, or who were, in care.

Staff have the skills, knowledge and understanding to safeguard Looked After Children and Care Leavers. The DSL and Designated Teacher will work with relevant agencies and take immediate action to safeguard and provide support to this vulnerable group of children.

As a federation our Designated teacher for Looked After Children is **Louise Wilcox (SENDCo.)** The Designated teacher for Looked After Children will work with the Virtual School and ensure that PEP's are undertaken, reviewed and evaluated with the parent, Virtual School teacher, class teacher and SENDCo as necessary. The Designated teacher for Looked After Children will notify the teacher if a child who is looked after, or was previously looked after, is in their class or care. The school's role will be to exercise continued vigilance, to ensure that the child continues to be safe, and to make educational progress, and will take swift and effective action in line with our procedures if we have any concerns. Teachers will need to

consider adjustments and interventions to enable a child to catch up or progress further with their learning.

The school's Designated Safeguarding Lead will work with the local authority's Personal Advisor appointed to guide and support Care Leavers, so that any issues or concerns affecting the care leaver can be explored and effective support put in place.

The schools will work with the Tower Hamlets Virtual School to promote and champion the attendance, attainment and progress of children in kinship care arrangements. Since September 2024, the Virtual School has a non-statutory responsibility to promote the education of children in kinship care arrangements regardless of whether the children have been previously looked after by the Local Authority. [Kinship Care](#) is any situation in which a child is being raised in the care of a friend or family member who is not their parent. The arrangement may be temporary or longer term. Examples of kinship care arrangements include Private Fostering Arrangements, Special Guardianship Order, and Child Arrangements Order, where the child is being cared for by a relative or friend who is not a parent.

CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

Children with special educational needs and disabilities (SEND) or physical health issues can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- professionals and other adults making assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- the potential for children with SEN and disabilities or certain medical conditions being vulnerable to experiencing peer exclusion and isolation and being disproportionately impacted by behaviours such as bullying (including prejudice-based bullying), without outwardly showing any signs;
- children not understanding that what is happening to them is abuse; and
- communication barriers when reporting abuse and difficulties in overcoming these barriers.

For some disabled children, their dependency on parents and carers for practical assistance in daily living, including intimate personal care, may increase their risk of exposure to

abusive behaviour. Some children may also have an impaired capacity to resist or avoid abuse. Looked After Disabled Children may be particularly susceptible to possible abuse because of their additional dependency on residential and hospital staff for day-to-day physical care needs.

Further information on safeguarding SEND children is available in the non-statutory guidance [Safeguarding Disabled Children](#) (2009); [NSPCC Safeguarding Children with Special Educational Needs and Disabilities](#) (May 2022), and [NSPCC Safeguarding d/Deaf Children and Children who have disabilities at greater risk of abuse](#) (June 2024), but staff should speak with the DSL and SENDCo in the first instance.

All staff are regularly trained to understand and be aware of the additional barriers that exist when safeguarding children **with SEND**. All staff need to be aware that children **with SEND** may be more vulnerable when online and using digital platforms, and it is important that Online Safety lessons and related advice are tailored to their individual needs.

Any child with a disability is by definition a 'child in need' under section 17 of the Children Act 1989 and disability has been shown to confer an increased level of vulnerability. Studies have shown that disabled children are more likely to be neglected, physically abused, sexually abused and emotionally abused.

As a federation we understand and are aware that children with special educational needs (SEND) or physical health issues can face additional safeguarding challenges.

Staff report any concerns to the DSL, they take the following steps for guidance and advice:

Multi Agency Safeguarding Hub (MASH)/ Child Protection Advice Line (CPAL):
020 7364 5006 (option 3) or 020 7364 3444 (manned between 9am-5pm)

or

The Children's Social Care Emergency Out of Hours' Duty Team
020 7364 4079 (from 5pm onwards)

Or

Prevent Education Officer

Iona Karrman Bailly

Iona.Karrman-Bailey@towerhamlets.gov.uk

07842301565

CHILDREN ABSENT FROM EDUCATION & CHILDREN MISSING EDUCATION

The school closely monitors attendance, absence, suspensions, and exclusions. A child absent from education, whether prolonged or on repeat occasions, can be a vital warning sign of a wide range of safeguarding issues and is a potential indicator of abuse and neglect, including child sexual abuse, child sexual exploitation, and child criminal exploitation (county lines):-

In accordance with the DfE's statutory guidance [*Working together to improve school attendance*](#), the school follows up on absences and addresses persistent and severe absence as part of its safeguarding duty. Such an approach prevents the risk of these children becoming children missing education in the future. Staff address daily absence and persistent absence as soon as these problems emerge as part of school's early help response. Staff should be alert to children already known to be vulnerable especially Children known to a Social Worker and Looked After Children, since absence from education may increase known safeguarding risks within the family or in the community. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Both schools carry out daily registration and absences will be dealt with in accordance with their statutory Attendance Policy, and as part of its safeguarding duty, starting immediately with first day calling.

Where reasonably possible, we will hold more than one emergency contact number for each pupil. This is to give us additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. Both schools have the support of an attendance and welfare advisor who will work with the schools officer to identify any concerns. These are then reported to the DSL and followed up with the schools EHW who then arranges support meetings

When a pupil does not return to school and the whereabouts of the child and their family are not known, the school will make reasonable enquiries and refer the child to the Attendance & Welfare Advisor to support with those enquiries to ascertain the child's whereabouts, and only after these steps have been taken refer to the Local Authority using a Missing Children referral form.

Contact: LBTH CME Officer, Tower Hamlets Education Safeguarding Service, Saadia.Anwer@towerhamlets.gov.uk 020 7364 3426 / 07562 431 817

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

ELECTIVE HOME EDUCATION

The school recognises that parents have a legal right to electively home educate their child at home; however, it is expected that the parents' decision to do this is made with their child's best education and best interests at its heart. Staff should be aware that even though most home educated children have a positive experience, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

When a parent informs the headteacher of their intention to electively home educate their child, the school will convene and coordinate a meeting between the LA, relevant school staff, parents and all key professionals currently working with the child and family. In accordance with [Keeping Children Safe in Education](#) and LBTH Policy this meeting has to occur before any final decision is made by the parents, to ensure that the best interests of the child have been taken fully into account and carefully considered. The occurrence of this meeting is especially important when the children have known vulnerabilities including Children known to a Social Worker and children [with SEND](#).

WHISTLEBLOWING

All staff members have a responsibility to raise concerns about poor or unsafe practice and potential failures in any aspect of the school's safeguarding arrangements and staff should feel confident that such concerns will be taken seriously by the senior leadership team.

The staff and governors of the federation seek to run all aspects of business and activity with full regard for high standards of conduct and integrity. In the event that members of School staff, parents, governors or the community at large become aware of activities which give cause for concern, the federation has established a whistleblowing policy, or code of practice, which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

The federation has designated a number of individuals to specifically deal with such matters and the whistleblower is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

Executive Headteacher: Fanoula Smith

Chair of Governors: Chris Coyle contact: ccoyle9.211@lgflmail.org

This is shared with the staff via the school handbook and website.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, they should consider other channels available to employees as set out in [Government's guidance on whistleblowing](#). To raise whistleblowing concerns externally school staff are advised to report to the Prescribed Bodies in the [Government's List of Prescribed Bodies and Persons](#), which includes for safeguarding related concerns the NSPCC: Whistleblowing Advice Line 0800 028 0285 which is free & anonymous, more information can be found at nspcc.org.uk/whistleblowing.

REPORTING OF ALLEGATIONS AGAINST STAFF & CONCERNS THAT DO NOT MEET THE HARM THRESHOLD (Low Level Concerns)

Allegations of harm may indicate that a person who works with children might pose a risk of harm to children if they continue in that role. When an allegation is made against a member of staff including supply staff and volunteers, the school's Managing Allegations Procedures should be followed, and all action taken needs to be in line with [KCSIE 2025](#) Part 4 and the THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – [September 2025](#).

An allegation is made against a member of staff including supply staff, volunteers, contractors and governors, when an individual 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 he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

All staff must report all allegations, irrespective of the source, directly to the Executive Head Teacher and ensure that it is put in writing, signed and dated. If the subject of the allegation is the Executive head teacher, then the allegation should be directly reported to the Chair of Governors.

On receipt of a report of an allegation, the head teacher will make immediate contact with the Local Authority Designated Officer for an initial discussion. If the allegation concerns the head teacher, then the Chair of Governors shall make contact with the LADO.

When an allegation is made against a supply member of staff, the head teacher will be the case manager and take the lead in contacting the LADO.

When schools receive a report of an allegation relating to an incident that happened when an individual or external organisation was making use of the school premises for activities involving children, the headteacher should seek the advice of the LADO.

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

Each school will keep a log of all concerns raised

LBTH Local Authority Designated Officer (LADO): Melanie Benzie

Email: Melanie.Benzie@towerhamlets.gov.uk or LADO@towerhamlets.gov.uk

Telephone: 0207364 0677

In accordance with the Early Years Framework registered Early Years settings must notify Ofsted of serious allegations of harms and the actions taken by the setting as soon as is reasonably practicable but no longer than 14 days. A registered provider who, without reasonable excuse, fails to comply with this requirement, commits an offence.

Concerns about staff that do not initially seem to fulfil the allegation criteria set out above are known as Concerns that do not meet the Harm Threshold, sometimes called low-level concerns, not because they are insignificant but because they do not initially seem to meet the harm threshold. Staff should report and self-report such concerns in accordance with the school's procedures which are found in the school's Staff Code of Conduct. Contact will be made with the LADO for advice and guidance when appropriate as part of the Headteacher's or Chair of Governor's response to the report.

As per the school's Code of Conduct Policy, staff are always representatives of the school and the educational profession. Attitudes and conduct need to reflect the ethos and values of the organisation and instil public confidence. This is exemplified in the preamble to the standards that stipulates that "Teachers make the education of their pupils their first concern and are accountable for achieving the highest possible standards in work and conduct. Teachers act with honesty and integrity; have strong subject knowledge, keep their

knowledge and skills as teachers up-to-date and are self-critical; forge positive professional relationships; and work with parents in the best interests of their pupils.”

The standards apply to all members of our school community, teachers, teaching assistants, admin and premises staff.

It is important that the organisation makes clear actions that constitute minor or gross disciplinary action so that they can be avoided. These lists are for guidance and not exhaustive:

Minor Misconduct could be;

- Failure to carry out your contract or conditions of employment
- Failure to stay at work during work time
- Frequent failure to be punctual
- Failure to notify the school of absence
- Making unauthorised phone calls or using the school’s internet for personal use
- Failure to follow a manager’s reasonable instructions
- Failure to exercise proper control or supervision over pupils
- Abusive behaviour or language toward staff, parents, pupils or members of the public
- Victimisation or intimidation of others
- Dishonesty
- An attempt to mislead

Misconduct of a gross nature may be;

- Theft, fraud, deliberate falsification of records
- Fighting or assault of another
- Deliberate damage to school property
- Violent or intimidating conduct
- Serious incapability due to alcohol or drugs
- Serious breach of confidence
- Bringing shame on the employer
- Child abuse
- Serious misuse of the internet
- Negligence that causes unacceptable loss, damage, or injury
- Serious act of insubordination
- Unauthorised entry to computer records
- Continue and repeated offences

All staff should understand their responsibility to report all concerns about staff conduct which has taken place at the school or outside of the school including online environments, no matter how small or insignificant they might be perceived to be.

STAFF SAFEGUARDING TRAINING INCLUDING TRAINING FOR GOVERNORS

In addition to School Staff, Governors and Trustees are required to have compulsory safeguarding training as part of their induction and to maintain their knowledge through regular safeguarding training and updates. The safeguarding training at induction and indeed as part of continuous professional development should include Online Safety covering among other things an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring systems in place at the school. Through regular safeguarding training and updates staff are given the relevant skills and knowledge to safeguard children effectively and governors/trustees will be empowered and equipped to provide strategic challenge and gain assurance that effective safeguarding arrangements are in place.

All staff complete regular training, including annual safeguarding training that addresses changes to Keeping Children Safe in Education (KCSiE). Alongside this training, staff are quizzed on their understanding of safeguarding children and amendments/ changes to KCSiE.

All staff are required to complete the training and those that miss the training **must** catch up with the training at the next available opportunity.

Staff have regular weekly briefings where any changes/ updates to safeguarding children are addressed and staff are informed.

Governors are informed of safeguarding training that is available to them and are required to read part 2 of KCSiE, with the recommendation being that governors read the entire document.

VISITORS

The federation appreciates and values the educational benefits of visitors visiting the school to address pupils and/or staff. However, we recognise our responsibilities to the pupils in our care and require a number of Safeguarding procedures to be followed:

- The DSL must be informed in advance that a visitor is to be invited to the school.
- The DSL can then give outline authorisation for the visitor to be booked.
- The DSL then initiates the vetting process.
- Final clearance for the visitor can then be granted by the DSL.

- If the school has any concerns during the vetting process, we will pass any relevant information to the Local Authority Prevent officers.

All visitors:

- Are met on arrival at reception where they sign in and an ID badge is issued. Staff should question any adult in the building that is not wearing a lanyard.
- Are accompanied by a member of staff to and from Reception.
- Are provided with an overview of CP safeguarding procedures (Read on arrival on the schools electronic sign in system) and named staff/contacts (if working with children)
- If concerns are raised regarding the visitor, the designated Safeguarding lead will take action to address the concern in line with the school's Safeguarding and Child Protection policy.

When a Social Worker, Police Officer or another professional visits the school to meet with a child as part of statutory investigations or other work, the ultimate safeguarding responsibility remains with the school. The school is aware of the need for the child to have an appropriate adult when interviewed by the Police in accordance with the [PACE Code C statutory guidance](#).

ALTERNATIVE PROVISION PROVIDERS

When the school places a pupil with an alternative provision provider in the best interests of the child, the school will continue to be responsible for the safeguarding of that pupil and will take action to be satisfied that the placement meets the pupil's needs.

In accordance with KCSIE and the statutory guidance [Arranging Alternative Provision](#), as a minimum, the school will have a written record of where a child is based during school hours, the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. The school will regularly review at least half termly the alternative provision placements to obtain assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the school will immediately review the placement and consider termination, if necessary, unless or until those concerns have been satisfactorily addressed.

In fulfilment of its safeguarding responsibilities towards the pupil placed there, the school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the Alternative Provider, for example, the checks that schools would otherwise perform on their own staff. The school will also

obtain written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

If you are booking a trip:

Be mindful of the time factor; if public transport needs to be booked, we MUST allow at least 21 days for tickets.

Be aware of the time of the year – venues do get fully booked especially during the Summer term.

Staff complete a risk assessment for any trip where children are taken off site. This completed risk assessment should be checked and signed by a member of SLT and overseen by the designated safeguarding lead.

Where services or activities are provided separately by another organisation outside of normal school hours, the school will seek assurance that the organisation has effective safeguarding policies and procedures in place. This applies regardless of whether or not the children who attend any of these services or activities are pupils on the school register. The safeguarding standards expected of non-regulated external organisations are set out in the Department for Education's [After-School Clubs, Community Activities and Tuition: Safeguarding Advice for Providers \(September 2023, Updated 29 May 2025\)](#). The school will ensure that all safeguarding requirements are set out clearly in the lease or hire agreement with the organisation, as a condition of use and occupation of the school premises; and that failure to comply would lead to the termination of the agreement.

IDENTIFYING ABUSE

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Abuse may be carried out by adults and other children.

The school is aware that children can be at risk of abuse, harm and exploitation outside of the family home. Such extra familial harms include sexual exploitation, criminal exploitation, serious youth violence, and abuse that occurs on digital and online platforms. All staff especially the DSL and Deputy DSLs must consider whether children are at risk of harm and

exploitation in environments outside the family home. All staff should therefore apply a Contextual Safeguarding approach when safeguarding children in the setting.

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[Further information on Contextual Safeguarding can be found at the Contextual Safeguarding Program](#), which also contains self-assessment resources for schools namely the [Beyond Referral Toolkit: Harmful Sexual Behaviours](#) and [Beyond Referral Toolkit: Extra-familial harms in schools](#). The council's Exploitation Team is providing training sessions for School DSLs on Harms outside the Home. To book please contact THESS.

INDICATORS OF ABUSE

Physical - 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 fabricates the symptoms of, or deliberately induces, illness in a child.

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

Further guidance and resources for schools on Child Sexual Abuse can be found on the [Centre for Expertise on Child Sexual Abuse website](#) which includes the guidance documents *Communicating with Children for Education Professionals* and *Communicating with Parents and Carers*.

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

Neglect - the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.

The DSL is aware of the borough's [LBTH Neglect Guidance toolkits](#) and all school staff understand their important frontline role in identifying children who may be suffering from Neglect.

VOICE OF THE CHILD

All those with a responsibility to safeguard children need to recognise that it takes great courage for a child to share a concern and speak up about any form of abuse especially child sexual abuse.

There are many reasons why children are not able to articulate what they are experiencing. Children may feel embarrassed, humiliated, or are currently being threatened by the perpetrator of abuse. Also, children may not feel ready or know how to tell a trusted adult

that they are being abused, exploited, or neglected. They may not even realise that their experiences are harmful.

The barriers preventing a child communicating their concerns may be connected to their vulnerability, disability, sexual orientation, or language. The child's behaviour including misbehaviour may be the first sign that a child has experienced harm. Staff will therefore exhibit professional curiosity and understand that a child may be communicating a concern through their actions and behaviours and take a safeguarding approach when responding to behaviours.

Staff need to be aware of and promote the systems in place at the school which enable children to share their concerns and report abuse confidently. Children need to be assured that their concerns will be taken seriously by staff and action will be taken to safeguard and protect them. It is also important that staff determine how best to build safe and trusted relationships with children and young people which facilitates communication and the sharing of concerns.

The voice of the child

- the staff are aware of the importance of the child's voice
- Staff will take children's disclosures and concerns seriously and refer to the DSL and safeguarding with reference to school safeguarding procedures.
- Children are encouraged to share feelings/disclosures with trusted members of staff and the safeguarding team.
- Posters around the school identify the members safeguarding team for staff and children alike.
- Children are made aware of the school's play therapist, and mentoring programmes, and the support that can be offered.
- Children are encouraged to use their class 'worry box' to communicate a need/worry/concern if they wish to.
- Mental wellbeing, healthy relationships and staying safe online are embedded into PSHE/Relationships education, relationships and sex education (RSE) and health education curriculum.
- Class circle time/P4C provides opportunities for children to voice any concerns.

SAFEGUARDING ISSUES

CHILD SEXUAL EXPLOITATION

Child Sexual Exploitation is a form of child sexual abuse. CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Apart from age

other factors that could make a child more vulnerable to exploitation, include gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, as they may believe they are in a genuine romantic relationship. Children may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Staff should be vigilant and be aware of the following indicators of CSE, which is by no means an exhaustive list, and report all concerns immediately to the DSL:

- Children who are in possession of multiple phones and overly anxious to check their phones
- Children who experience sudden changes in behaviour e.g. looking agitated, children who want to leave the school premises at lunchtime
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant.
- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

CSE risks to children are communicated through the schools PSHE and RSE curriculum.

For further information staff can read the [Home Office Statutory Guidance](#) on Child Sexual Exploitation as well as speaking to the DSL. [The Children's Society has provided useful guidance on Child Sexual Exploitation.](#)

CHILD CRIMINAL EXPLOITATION INCLUDING COUNTY LINES

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

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country through County Lines, forced to shoplift or pickpocket, or to threaten other young people. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to

All Staff should be aware that girls as well as boys can be risk of CCE. It is important for staff to note that boys or girls being criminally exploited are at higher risk of being sexually exploited.

Staff need to be aware of some of the indicators of CCE:

- Children who are in possession of multiple phones and overly anxious to check their phones
- Children who experience sudden changes in behaviour e.g. looking agitated, children who want to leave the school premises at lunchtime
- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;

- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

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

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Many of the indicators of children involved in County Lines are as described above under CCE. However, in addition they can include children who:

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

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office and The Children’s Society [County Lines Toolkit For Professionals](#). Metropolitan Police information leaflets raising awareness about Cuckooing are available from the [council website](#) in English, Bengali and Somali.

When referring children at risk of Exploitation to MAST, the school will give consideration to completing an Exploitation Screening Tool to support the Local Authority's assessment of risk to the child.

N.B. Primary schools should be alert to the increase vulnerability of children under 10 years old being exploited because they are under the age of criminal responsibility.

SERIOUS YOUTH VIOLENCE

All staff are aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

ONLINE HARMS

Children should have the right to explore the digital environment but also the right to be safe when on it. However, technology often provides the platform that facilitates harm, and the use of technology has become a significant component of many safeguarding issues. Examples of which include child sexual exploitation; child criminal exploitation; radicalisation; sexual predation/grooming; and forms of child-on-child abuse such as cyberbullying and nudes and semi-nudes. [The Online Safety Act 2023 among other things makes cyberflashing, threatening communications and the promotion of self-harm criminal offences.](#) Artificial Intelligence is the current technological innovation evolving with speed, which will benefit society including the education sector but also generate great risks and challenges compromising the safety of children, for example, Generative Artificial Intelligence is being misused to create sexualised images and videos of children especially girls.

[Further information can be found at the Internet Watch Foundation's Professionals Guide: Understanding and Responding to AI-Generated Child Sexual Abuse Material and the IWF's Report and Remove Tool that may be useful for pupils.](#)

In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, which can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially

around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In accordance with Behaviour in Schools. Advice for headteachers and school staff (September 2022), the school promotes as part of its culture of excellent standards of behaviour that the same standards of behaviour are expected online as apply offline, and that every pupil should be treated with kindness, respect and dignity.

An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk that should form the framework for school's approach to Online Safety:

Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racism, prejudice-based content, misogyny, **misinformation, disinformation, conspiracies**, self-harm, suicide, anti-Semitism, radicalisation and extremism;

- Contact: being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention of grooming or exploiting them for sexual, criminal; financial or other purposes;
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (e.g. consensual or non-consensual sharing of nudes and semi-nudes), and/or pornography, sharing other explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. When pupils are at risk of phishing, school can reports concerns to the Anti-Phishing Working Group (<https://apwg.org/>).

School is committed to reviewing and implementing its Online Safety Risk Assessment to keep staff and pupils safe when using technology including the use of Artificial Intelligence.

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).

When there are concerns about a child in this area, staff should notify the DSL, who will consider referring the child into the Cyber Choices programme (cyberchoices.uk), which provides early intervention where children 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.

In accordance with the Prevent Duty the school has appropriate filtering and monitoring systems in place when children access the internet via school devices and when using the school network. The school meets the Department for Education's Filtering and Monitoring Standards through

- identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- reviewing filtering and monitoring provision at least annually.
- blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- having effective monitoring strategies in place that meet their safeguarding needs.

Both Schools are committed to ensuring that Online Safety is a running and interrelated theme throughout its safeguarding arrangements including policy and procedure, the curriculum, staff training and induction, the role of the DSL, and parental engagement:

Both schools are part of LGFL which is used for the schools' filtering purposes and is regularly checked by the consultancy team.

Both schools have SENSO installed on all devices which will inform DSL's of critical incidents. As an extra measure DSL's meet weekly to check devices.

We ask that all staff take this into consideration when observing children's on line behaviour as well as when delivering the On Line Safety and RSE Curriculum each year.

We ask that staff recognise that children with known vulnerabilities such as SEND, LAC and PLAC children and Children known to a Social Worker, may be more vulnerable to harm and exploitation in the online and digital environments.

We encourage our parents and carers not to give their children mobile phones especially before Y6 and in Y6 only if they independently travel to and from school. This is because most young children are not yet ready to manage themselves safely with such easy access to the on-line world.

All staff must read and sign the Acceptable Use Policy before using any school ICT resource. We have a separate Internet Safety Policy which addresses online use and safety and also a behaviour policy. Staff are expected to read these in partnership with this policy. It addresses how we seek to protect children from potentially harmful and inappropriate online material

and behaviours with appropriate filters and monitoring systems in place **for school devices and on the school network – this is regularly monitored by our consultancy team.**

Children participate in online safety workshops which are delivered annually by the school's computing consultancy team - Levetts. Any concerns identified are immediately shared with the DSL and followed up appropriately. Levetts are also responsible for the monitoring and filtering of the schools software.

School is committed to ensuring that Online Safety is a running and interrelated theme throughout its safeguarding arrangements including policy and procedure, the curriculum, staff training and induction, the role of the DSL, and parental engagement. This includes promoting an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring systems in place when children access the internet via school devices and the school network.

As part of a whole school approach the school is committed to ensure that all parents have the opportunity to be empowered and upskilled in keeping children safe online through the sharing of Online Safety information, advice and guidance including the offer of workshops to support parents for example in installing safeguards on to their children's digital devices.

In accordance with Department for Education's guidance, Mobile Phones in Schools (February 2024), the school prohibits the use of mobile/smart phones throughout the school day as set out in the Behaviour Policy.

Staff should report Online Safety concerns about pupils to the Designated Safeguarding Lead as with all other safeguarding concerns. When it comes to the safety and well-being of the child, the response to the risks and harms that children may experience in the online or digital environment should be no different than the offline, face to face world. For most children there is little distinction between the online and face to face interactions as the two environments often intersect with one another in their daily lives. Staff should recognise that children's experience of abuse in the digital environment may be even more pronounced, where the identity of the abuser is unknown and the abuse can continue 24 hours a day, 7 days a week.

Staff should be aware that children with known vulnerabilities such as SEND, LAC and PLAC children and Children known to a Social Worker, may be more vulnerable to harm and exploitation in the online and digital environments.

DOMESTIC ABUSE

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse recognises that domestic abuse may occur in different types of relationships, including ex-partners and family members and is not restricted to the family home. According to the definition the person perpetrating the abuse and the person to whom the abusive behaviour is directed towards must be aged 16 or over and be “personally connected”. Domestic Abuse may involve a range of abusive behaviours, which may be a single incident or a pattern of abuse, including physical, sexual, emotional and economic abuse, and coercive and controlling behaviour.

Staff should be aware that all children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home because of the abuse. Children can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’.

In response to safeguarding reports received about children involving Domestic Abuse, the school will make contact with Children’s Social Care for advice and guidance. Where appropriate school will complete a DASH Risk Assessment with the individual reporting as a victim of Domestic Abuse.

The school has signed up to the Metropolitan Police’s Operation Encompass project. Operation Encompass ensures that when police are called to an incident of domestic abuse, and where there are children in the household, the police will notify the school’s Designated Safeguarding Lead before the child arrives at school the following day, so that the school can provide ‘silent support’ to the child and follow up with Children’s Social Care where appropriate.

Schools can contact the Tower Hamlets Violence Against Women and Girls Team for support required on any of the VAWG strands including training needs. Please contact the Prevent Training Officer: Amy-Kate.Garwood2@towerhamlets.gov.uk. Schools can also sign up to the VAWG Pledge.

SO-CALLED HONOUR-BASED ABUSE

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of so-called Honour Based Abuse are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of Honoured Based Abuse, or already having suffered Honour Based Abuse.

If staff have a concern regarding a child who might be at risk of Honour Based Abuse or who has suffered from Honour Based Abuse, they should speak to the Designated Safeguarding Lead, who will follow local safeguarding procedures.

Female Genital Mutilation

In England, Wales and Northern Ireland, FGM is a criminal offence under the Female Genital Mutilation Act 2003.

For more information follow the link: [HM Government Multi-Agency Statutory Guidance on FGM](#), Updated 30th July 2020

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. However, teachers should notify the Designated Safeguarding Lead of this action as well as reporting the disclosure of FGM in line with school's safeguarding procedures.

The duty on teachers to report to the police does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures and report concerns to the Designated Safeguarding Lead. If in doubt, staff should speak to the Designated Safeguarding Lead.

Forced Marriage

In England and Wales, the practice of Forced Marriage is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Schools and colleges play an important role in safeguarding children from forced marriage.

School staff should contact the Forced Marriage Unit if they need advice or information:
Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. In England and Wales, the practice of Forced Marriage is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

Both schools are sensitive to differing family patterns and lifestyles and child-rearing patterns that vary across different racial, ethnic and cultural groups. Forced marriage is a form of child, adult and domestic abuse and, in line with statutory guidance, is treated as such by the school. Child abuse cannot be condoned for religious or cultural reasons.

There are a range of potential indicators that a girl may be at risk of Forced Marriage. Warning signs that a forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of Multi-agency guidelines: handling case of forced marriage.

Information about Forced Marriage will be incorporated into staff Safeguarding and Child Protection training and briefings and the school's Safeguarding and Child Protection Policies will be used to protect a victim or potential victim of forced marriage.

If a case of forced marriage is suspected, parents and carers will not be approached or involved about a referral to any other agencies.

'Keeping Children Safe in Education', Annex B provides detailed guidance and references on what staff must do when responding to concerns relating to Honour Based Abuse.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - 154 Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case. 155 GOV.UK (www.gov.uk)

Virginity Testing and Hymenoplasty

The government has made it illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK, as part of the Health and Care Act 2022.

It is also illegal for UK nationals and residents to do these things outside the UK.

In response to any reports of a child/young person being subject to or at risk of virginity testing or hymenoplasty, the DSL will take action in accordance with the government's non-statutory guidance [Virginity testing and hymenoplasty: multi-agency guidance](#) (July 2022).

RADICALISATION AND EXTREMISM

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school's safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. 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.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

Prevent Strategy – preventing Violent Extremism

Home Office's definition of extremism:

“Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also calls for the death of members of our armed forces whether in this country or overseas.”

Schools have a statutory responsibility under the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism". The Statutory guidance on the Prevent duty 2023 (updated March 2024) outlines how education providers, including schools, must implement this duty. Paragraphs 141–207 focus specifically on education, emphasising the role schools play in safeguarding children from the risks of radicalisation and extremism. This includes ensuring staff are trained to recognise signs of vulnerability, establishing clear safeguarding procedures, and fostering a school ethos that builds resilience to extremist narratives. At St Paul with St Luke and St Saviour's, these responsibilities are embedded within the wider safeguarding framework, with clear leadership and governance oversight, ensuring a whole-school approach.

The guidance underscores that schools should assess the local threat context and tailor their Prevent strategies accordingly, promoting British values and critical thinking to help pupils challenge extremist ideologies. A risk-based approach is encouraged, where proportionate responses are developed through the curriculum, staff training, policies, and effective safeguarding procedures. Schools are expected to maintain robust partnerships with local safeguarding partners, the local authority Prevent team, and where appropriate, the police. Clear protocols must also be in place for referring concerns about individual pupils, including into Channel, the voluntary early intervention programme for those at risk.

In addition, the Department for Education's supplementary document The Prevent duty: safeguarding learners vulnerable to radicalisation (October 2022) provides further clarity for schools on how to support pupils while respecting freedom of expression and promoting inclusion. It encourages schools to view Prevent not as an additional task, but as part of their core safeguarding duty. It also highlights the importance of providing staff with the confidence and capability to raise concerns, manage disclosures sensitively, and understand the referral pathways. At St Paul with St Luke and St Saviour's these principles are reinforced through regular staff CPD, integration of Prevent themes into PSHE and citizenship education, and open dialogue with families and communities to build trust and cooperation in keeping children safe.

The federation acknowledges protection from radicalisation and extremist narratives as a safeguarding issue. The school recognises that it has a duty of care towards its pupils and that safeguarding against radicalisation and extremism is one of those duties.

Exposure of children to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence.

“Safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm.” Home Office – The Prevent Strategy

Staff of the federation take part in training that is delivered annually via Tower Hamlets - Iona Karrman Baily (Prevent Education Officer) Iona.Karrman_Bailey@towerhamlets.gov.uk 07842301565.

If a member of staff has a concern that a pupil is at risk from extremist narratives and or if it appears the young person is already exposed to or involved with extremist organisations, they must discuss this with the school Safeguarding / DSL Officers.

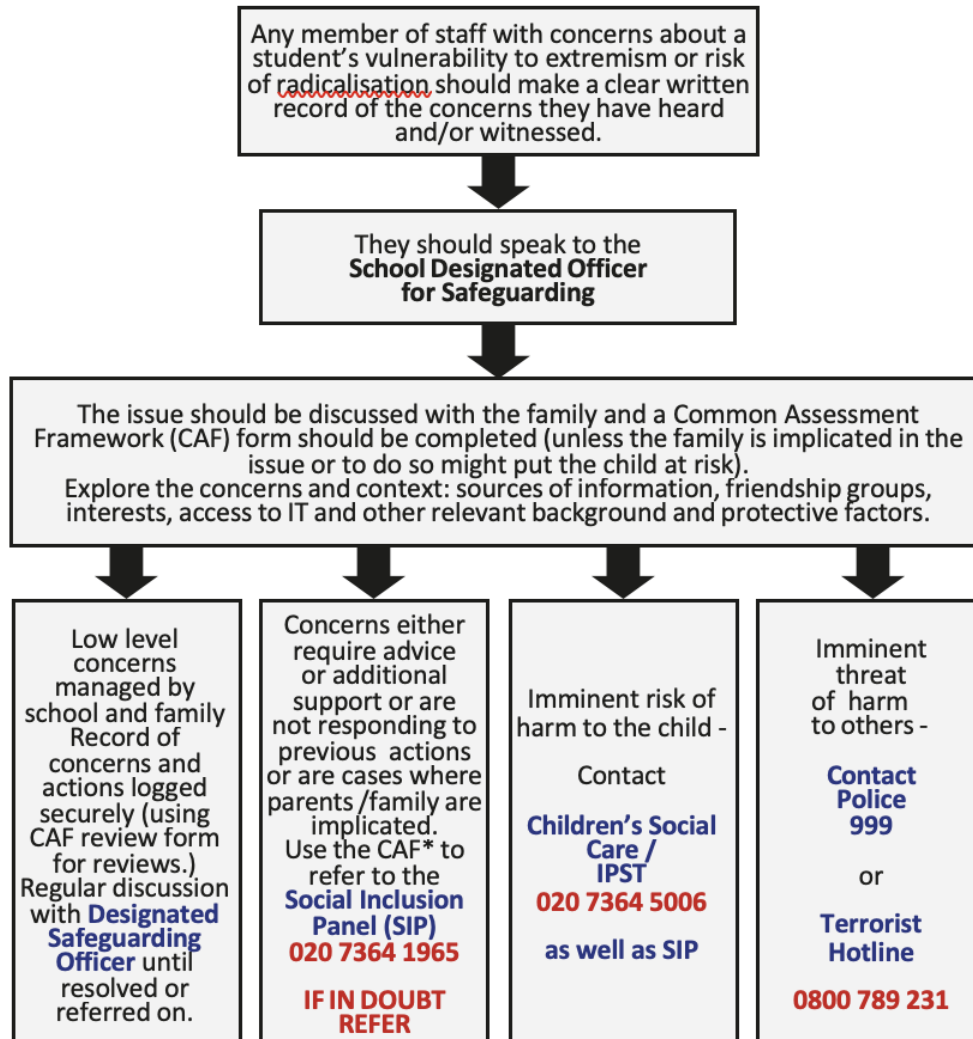
In LBTH the Prevent Education Officer is Iona Karrman-Bailey: Iona.Karrman-Bailey@towerhamlets.gov.uk

In LBTH all Prevent referrals related to children should be made through the Multi Agency Support Team.

If in doubt: REFER.

Prevent Referral Route

Referral route for safeguarding concerns related to Radicalisation or Extremism



**Although involving the family is best practice, you may share information (using a CAF) with other agencies (e.g. SIP) without consent and, if necessary, without the family's participation under the Crime and Disorder legislation which allows for information sharing to prevent crime.*

If in doubt SHARE and REFER to SIP.

*The **Social Inclusion Panel (SIP)** will advise on next steps and provide interventions. PREVENT interventions are voluntary so the family will be consulted and involved prior to further action.*

CHILD-ON-CHILD ABUSE

Staff must be aware that children may be harmed by other children.

Child-on-child abuse can happen both inside and outside of school including online. It is important that all staff recognise the indicators and signs of child-on-child abuse.

Staff should treat all reports of child-on-child abuse very seriously and make it clear that all forms are unacceptable. As with all forms of abuse the occurrence of child-on-child abuse is an infringement of a child's human rights. Abuse is abuse and will never be dismissed as 'banter' or 'part of growing up'. The school adopts a Zero Tolerance Approach to child-on-child abuse.

All staff should recognise that even though there are no reported cases of child-on-child abuse among pupils, such abuse may still be taking place and that it is simply not being reported.

Staff should be aware that it is more likely that boys will be perpetrators of child-on-child abuse and girls will be victims of child-on-child abuse. However, all forms of child-on-child abuse are unacceptable and will not be tolerated at the school.

Staff should recognise that child-on-child abuse can take many forms and may be facilitated by technology, including:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse such as biting, hitting, kicking or hair pulling
- sexually harmful behaviour and sexual abuse including inappropriate sexual language, touching, sexual assault or rape
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos
- teenage relationship abuse – where there is a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- upskirting – taking a picture under a person's clothing without their knowledge and/or permission with the intention of viewing their buttocks or genitals (with or without underwear) to obtain sexual gratification. It is a criminal offence.

- initiation/hazing - used to introduce newcomers into an organisation or group by subjecting them to a series of trials and challenges, which are potentially humiliating, embarrassing or abusive.
- prejudice and discrimination - behaviours which cause a person to feel powerless, worthless or excluded originating from prejudices around belonging, identity and equality, for example, prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

Although a child identifying as LGBTQ+ is not in itself a safeguarding concern, such children may be more vulnerable to forms of child-on-child abuse. This includes children who are perceived to be LGBTQ+ even though they do not identify as such. The school is committed to providing a safe space for LGBTQ+ children to share any concerns they may have and in ensuring an inclusive culture is maintained. [In the support that is provided to children questioning their gender, the school will adhere to any specific guidance issued by the Department for Education.](#)

The federation recognises the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys will be perpetrators) however, as in all aspects of safeguarding for all children, vigilance is necessary and any concerns need to be acted upon immediately.

We seek to minimise the risk of child on child abuse through the implementation of our curriculum and associated policies:

Our policy on the prevention and management of bullying acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

Our Relationships and Sex Policy/PSHCE Scheme outline how the school prepares the children for age appropriate relationships and physical contact. In particular, our relentless focus on our school values, strives to enable children to be respectful of one another and to be responsible for their 'positive' impact upon one another in a safe way.

We are clear however that abuse is abuse, it could happen here, but if it does, it will not be tolerated. Part of our duty for safeguarding is also teaching the children appropriate behaviours/language to avoid safeguarding matters escalating for them.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If you are concerned about potential child on child abuse, you must report it to the Designated Safeguarding leads.

If you suspect that children are involved in sexting – please refer to the guidance produced by the UK Council for Children Internet safety (Appendix 8) and report to the DSL.

In partnership with you, the Designated Safeguarding leads will decide what further action to take which may include, but is not limited to, the following:

- Discussions with alleged victim and perpetrator to understand the extent of the harm;
- Discussions with the alleged victim and perpetrators parents regarding the extent of the harm and a support plan to respond;
- The use of restorative practices to enable children to fully learn about and understand the extent of the harm that has been committed and to empower them to take responsibility for their actions;
- A support plan may include a referral to the school's Psychological Therapist or ELSAs;
- Discussions with the Early Help Hub may be sought to determine what support could be sought by both the alleged victim and perpetrator. This is likely to be appropriate if the abuse may have stemmed from a lack of structured time outside of school.
- If it is suspected that a device may contain inappropriate images the school will follow the DfE's guidance on 'Searching, screening and confiscation, January 2018' to seize the evidence.
- If there is evidence of producing or sharing sexual imagery, social care and the police will be informed immediately.

Further information can be found through THESS's [safeguarding resource webpage](#) that contains links to key organisations that can support schools in their response to forms of child-on-child abuse.

CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

All staff must be aware that sexual violence and sexual harassment can occur between two children of any age and sex and it can happen in any environment including schools, the family home as part of intra-familial abuse and via online platforms. It can also occur when a group of children sexually assaulting or sexually harassing a single child or a group of

children. The abuse may be perpetrated by a younger child towards an older child because of an imbalance of power caused by factors such as height difference or cognitive ability.

As part of school's wider safeguarding culture, staff should maintain an **'it could happen here'** approach in regard to child-on-child sexual violence and sexual harassment and understand that children in the school and the local community may be experiencing such forms of child-on-child abuse, including that facilitated by technology, regardless of the number of reports the DSL receives.

In response to reports of child-on-child abuse school will reassure all victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. As part of the reassurance to children, it will be made clear to children that the law is in place to protect them from abuse rather than to criminalise them.

Staff should be aware that some groups of children are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ+ children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting upskirts. Dismissing or tolerating such behaviours will help to normalise them.

Sexual violence offences are defined under the Sexual Offences Act 2003

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

All Staff need to be aware of the following:

- children under the age of 13 can never consent to any sexual activity;
- the age of consent is 16
- sexual intercourse without consent is rape.

Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. In parallel to this the school will make a referral to Children's Services via the Multi Agency Safeguarding Hub.

Sexual Harassment

Sexual Harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual Harassment may include the following:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence such as:
 - consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.
 - sharing of unwanted explicit content;
 - upskirting
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation, coercion and threats

On a case-by-case basis the school will liaise with Children's Services and the Police as well as specialist services as part of the immediate response to child-on-child sexual harassment and the ongoing support for all the children involved.

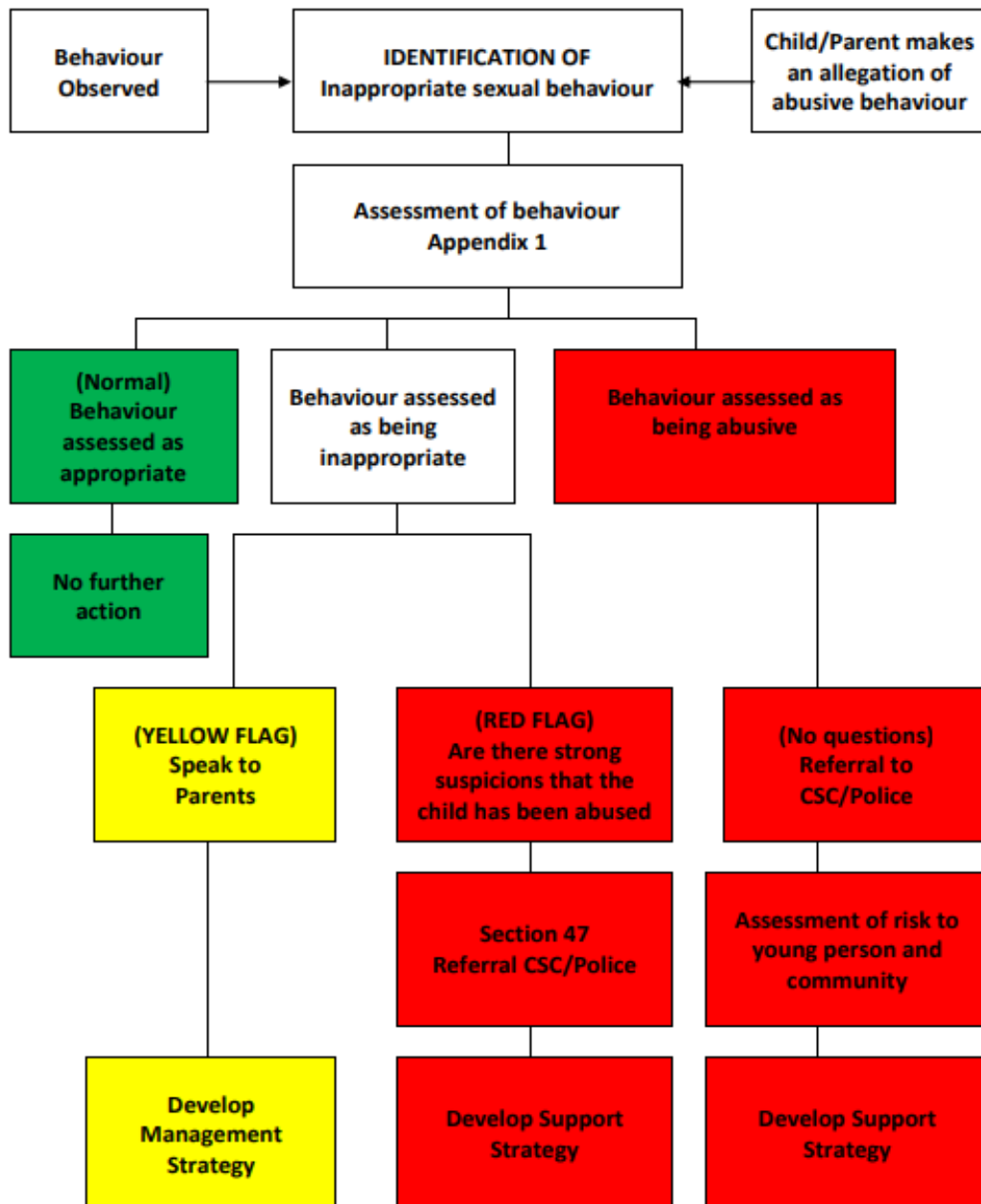
Harmful Sexual Behaviours

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. School recognises that Harmful Sexual Behaviours can, in some cases, progress on a continuum. It is therefore important for all staff to address inappropriate behaviours to help prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma.

Schools take seriously their duty to respond appropriately to all reports and concerns about children's sexual behaviours both online and offline, in and outside of the school, including reports of sexual violence and/or sexual harassment. The DSL has completed relevant training in responding to and managing harmful sexual behaviours and will draw upon appropriate resources such as the AIM Checklists and Assessment Tools. The DSL will liaise where appropriate with Children's Services, the Police and other specialist services.

If a DSL is informed of a child displaying behaviours, then records are kept and shared via CPOMs - Schools safeguarding software. Actions are taken to limit risk; the DSL will seek advice from the Local Authority/Computing consultancy team if needed and follow up. The school also has support from a pastoral team.

Flow Chart of Procedures on the Assessment and Management of Sexualised Behaviour in Children and Young People



The safety plan is a set of external controls and limits designed to help staff in schools safeguard the child and manage potential risk situations in the school environment. The plan has been developed in response to the specific inappropriate or harmful sexual behaviour displayed by the child, therefore the senior staff in school must be fully informed of the case specific details. In order to be effective the School Safety Plan must;

- Be agreed with the child and family
- Be regularly reviewed – in line with an agreed timescales included in the plan
- Be tailored to the specific details of an individual case
- Consider any special needs a

child may have limits and controls that can be easily implemented. Be supported and informed by relevant professionals working with the child. Consider the transportation of the child to and from school. It may also; Where necessary be reviewed in risk management meetings. The School Safety plan will support the child to be able to continue with their education as far as possible in the school setting. In order to do this a number of issues should be considered.

To support its overall prevention of and response to harmful sexual behaviours the school will give consideration to the best practice resources such as that available through the [Contextual Safeguarding Program](#) in particular the [Beyond Referrals Toolkit: Harmful Sexual Behaviours](#)

YOUTH PRODUCED SEXUAL IMAGERY

Youth Produced Sexual Imagery is one of the terms professionals use to describe the sending or posting of nude or semi-nude images, videos or live streams by children and young people under the age of 18 online. The term 'nudes' is used by children and covers all types of image sharing incidents. Alternative terms used by children include 'dick pics' or 'pics'.

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Nude or semi-nude images, videos or live streams may include more than one child or young person.

Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame. Such images can be shared via web pages and social media accounts called 'Bait Out' pages/accounts.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal.

When handling reports of Youth Produced Sexual Imagery, **staff must be aware that it is illegal for staff to view or share such imagery**. Staff should immediately inform the Designated Safeguarding Lead who will act in accordance with non-statutory guidance, [Sharing Nudes and Semi-Nudes. Advice for Education Settings working with Children and Young People](#) (Updated March 2024).

Sharing nudes or semi nudes/Youth Produced Sexual Imagery

Definition:

‘The sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline.’ (KCSIE Dec.2020)

The motivations for this material are not always sexually or criminally motivated.

Images may be created and shared consensually by young people who are in relationships, or not.

A young person in a consensual relationship may be coerced into sharing an image with their partner.

Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or sharing images more widely without consent to publicly shame.

Creating and sharing nudes and semi-nudes under-18s (including those created and shared with consent) is illegal. The law criminalising indecent images of children was created to protect children and young people from sexual abuse. It was not intended to criminalise children and was developed long before mass adoption of the internet, mobiles and digital photography.

Children and young people who share nudes and semi-nudes of themselves, or peers, are breaking the law. However, children and young people should not be unnecessarily criminalised and police involvement does not automatically mean a criminal record.

There are 2 types of incident:

Aggravated incidents:

Adult involved: adult offenders attempt to develop relationships by grooming children and young people. Victims may be family friends, relatives, community members or contacted via the Internet. The images may be solicited by adult offenders

Youth only:

intent to harm: Cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people

reckless misuse: no intent to harm but images are taken or sent without consent or knowledge. Pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result

Experimental Incidents:

Incidents involving the creation and sending of images with no adult involvement, no apparent intent to harm or reckless misuse.

These can further be subcategorised into:

romantic: incidents in which young people in ongoing relationships make images for themselves or each other only.

‘attention seeking’: incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image

other: May involve young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives

In a majority of cases, the school is likely to be dealing with experimental incidents, with no need for police involvement.

Where the incident is aggravated, and there is reckless misuse and/or intent to harm, then the school will refer the incident to the police through MASH. A police criminal justice response against a young child would be considered exceptional, as the primary concern must be for the welfare and protection of the children/young people involved, not criminalisation.

If staff have any concerns, they must report concerns/disclosure to the DSL who will determine how to proceed with reference to the procedures set out in 'Sharing nudes and Semi-Nudes' DEC 2020.

Namely:

- Hold an initial review meeting with appropriate staff and safeguarding or leadership team who deal with safeguarding concerns
- Hold interviews with the children or young people involved (if appropriate)
- Inform parents and carers at an early stage in the process unless, there is good reason to believe that involving them would put the child or young person at risk of harm
- Refer to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process (aggravated incidents)

School's response will be proportional and will differ depending on the motivations behind the incident and the appropriateness of the child or young person's/people's behaviour.

The primary concern must be the welfare and protection of any children/young people involved. No blaming or shaming.

When a disclosure is made, the member (or members) of staff should ensure the child is feeling comfortable and appropriate and sensitive questions are asked, in order to minimise any further distress or trauma.

Staff must explain to the child that they will need to report the incident and reassure them that they will receive support and help from the DSL.

Information must be shared only with the DSL and treated as confidential.

All staff must avoid intentionally looking at any images that have been disclosed. Where possible actions should be based on what staff/DSL's have been told about content.

Any decision to view will be recorded and based on the professional judgement of the DSL/Safeguarding team, Such a decision will comply with the CP procedures and will be because viewing is the only way to:

- Make a decision about whether to involve other agencies;
- Report to a website/app/reporting agency to have it taken down;
- Support the child/young person or parent/carers in making a report.

All incidents regarding the sharing of nude or semi-nude images will be recorded and kept in line with statutory requirements set out in [KCSIE 2025](#), local safeguarding procedures and this policy.

For more detailed information please see: [Sharing Nudes and Semi-Nudes. Advice for Education Settings working with Children and Young People Updated March 2024.](#)

BULLYING (INCLUDING CYBERBULLYING)

Bullying 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 the school's Anti-Bullying Policy/Pupil Behaviour Policy/Child-on-child abuse Policy, in accordance with [Keeping Children Safe in Education 2025](#) and Behaviour in Schools. Advice for Head teacher and School Staff (September 2022).

Our values and PSHE curriculum contribute to the addressing of bullying concerns and relationships; as well as collective worship, circle time, cooperative group work and class led sessions. We believe in a restorative justice approach, striving to be restorative rather than punitive, with the ethos of actively listening to others and mending relationships through mutual agreement, if possible.

HOMELESSNESS

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. 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 DSL will raise concerns at the earliest opportunity about a family at risk of homelessness through the [Tower Hamlets Homeless and Housing Options service](#).

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. However, it is also 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 should be contacted in the first instance. For general enquiries about support for young people who might be at risk of or experiencing homelessness in the borough, please contact Tower Hamlets Housing Options: Host@towerhamlets.gov.uk

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.

The DSL will ensure that the children concerned are supported and where appropriate make use of the guides provided by the HM Courts & Tribunals Service for [children 5-11-year olds](#) and [12-17 year olds](#).

Making child arrangements via the family courts following parental separation can be stressful and entrench conflict in families. This can be stressful for children too. Where appropriate parents can be signposted to the Department of Justice's [information toolkit](#) for families on making child arrangements which sets out each party's responsibility including the importance of putting the needs of the children first in the process.

CHILDREN WITH FAMILY MEMBERS IN PRISON

An estimated 310,000 children every year have a parent in prison in England and Wales and 10,000 visits are made by children to our public prisons every week. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

The DSL will draw upon the resources and guidance offered through [The National Information Centre on Children of Offenders](#) (NICCO) to support the children involved and mitigate negative consequences for those children.

PRIVATE FOSTERING

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Staff should be vigilant about children who are in private fostering arrangements and report concerns to the DSL, who will notify the Local Authority through a MASH referral, as set out in the THSCP Multi-Agency Private Fostering Guidance (January 2022). The Local Authority

will check the arrangement is suitable and safe for the child in accordance with the [Private Fostering statutory guidance](#).

YOUNG CARERS

A young carer is a person aged 18 or under who cares, unpaid, for a friend or family member. This can include, but is not limited to a person with:

- a long-term illness or condition
- a physical or learning disability
- a substance misuse problem
- a mental health problem

The support provided by a child can vary based on the condition of the person they are caring for, but typically young carers provide a combination of personal (such as helping to dress or bath them), practical (such as cooking, cleaning and shopping) and emotional care (such as talking through their concerns with them).

It is estimated by the Children's Society that 1 in 5 children are young carers and many are hidden and unidentified.

No young carer or young adult carer should take on caring roles which are inappropriate, excessive, or which negatively impact their life opportunities, health or wellbeing.

The school is committed to raising awareness about young carers, among staff, pupils and parents/carers, so that young carers can be identified and receive the support they need. The school will utilise the Young Carers in Schools program resources provided by the Carers Trust and the Children's Society: <https://youngcarersinschools.com/> alongside the Tower Hamlets guidance for schools, '[Young Carers in School: A guide for education practitioners to identify and support young carers in schools](#)' and other resources available from [THESS's safeguarding resource webpage](#).

The DSL will take the lead for Young Carers at the school and ensure that there is a whole school approach to improving the outcomes for young carers.

When young carers are identified, the DSL or Deputy DSL will have a conversation with the child using if helpful the [Tower Hamlets Young Carers Identification Tool](#).

School recognises that in accordance with the [Care Act 2014](#) and the [Children and Families Act 2014](#) young carers have the right to an assessment by the Local Authority to identify

needs and support and the person they are caring has the right to have a reassessment of their needs.

If the school thinks that the child or young person or a member of their family requires more support than the school alone can provide, the DSL/Deputy DSL should refer to the [Tower Hamlets Multi-Agency Support Team \(MAST\)](#), so that a Young Carers Assessment can be undertaken. This assessment can help to identify what additional support can be provided from other services including housing and adult social care. Schools should complete the [Tower Hamlets Young Carers Identification Form](#) and attach it to the MAST referral form that is sent.

CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is the unauthorised removal or retention of a child 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.

All incidents of Child Abduction should be reported immediately to the Police and Children's Social Care.

Other community safety incidents in the vicinity of a school can raise concerns amongst staff, children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. All incidents that occur during the school day should be immediately reported to the DSL, and steps taken to ensure the safety and well-being of the children involved.

MODERN SLAVERY

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer to the National Referral Mechanism is available in the [Modern Slavery Statutory Guidance](#).

The DSL will refer all potential child victims of modern slavery to the Local Authority via MASH.

TAKING SAFEGUARDING ACTION

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here". Key points for staff to remember are:

- in an emergency take the action necessary to help the child (including calling 999)
- report your concern as soon as possible to the DSL, **preferably immediately but no later than the end of the day**. The DSL will then seek support.
- if a child makes a disclosure, do not promise to keep this secret
- 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 – upload information to CPOMs and alert DSL/DDSL
- seek support for yourself if you are distressed.

EARLY HELP

All staff are trained and prepared to identify children who may benefit from Early Help, which is providing support as soon as a problem emerges at any point in a child's life. This can be support provided through school's internal pastoral system and resources and/or Local Authority services and other external agencies.

The Tower Hamlets Early Help Strategy recognises the important role schools have in identifying children and families who are at risk of poor outcomes without early intervention.

All staff need to recognise that all children may benefit from Early Help at any point in their childhood, but some children may benefit from Early Help more than others. These are children with known vulnerabilities, which are listed on page 9 of this policy.

Early sharing of information or concern in regards to a child or their family could trigger support for the child and their family that in turn means a more serious safeguarding matter is avoided.

We recognise that any child may benefit from Early help, as such we are consistently vigilant for all children, however we recognise the need to be particularly alert to the potential need for early help, for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan)

- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
 - Is frequently missing/goes missing from care or from home;
 - Is misusing drugs or alcohol themselves;
 - Is at risk of modern slavery, trafficking or exploitation;
 - Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
 - Has returned home to their family from care;
 - Is showing early signs of abuse and/or neglect;
 - Is at risk of being radicalised or exploited;
 - Is a privately fostered child.

The DSL will contact the LBTH MAST for support and advice if required: 020 7364 5006 (Option 3) 020 7364 3444/5601/5606/5358/7796

When an EHA has been completed and a Team Around the Family is in process, the school can refer to the borough's Social Inclusion Panel in support of a co-ordinated and targeted plan to bring about improvement in the child's outcomes.

The DSL will apply the THSCP Levels of Need Guidance to decide what level of safeguarding response is required as part of the Early Help response. If in doubt about the level of need the DSL will telephone the LBTH Multi Agency Support Team (MAST) for a discussion.

MAST:

020 7364 5006 (Option 3) 020 7364 5601/5606/5358/7796

Child Protection Advice Line

020 7364 3444

If a child has been receiving Early Help support from the school and other agencies and there is no improvement in the child's outcomes, then the DSL must refer the child to Children's Social Care.

HANDLING THE REPORTING OR SHARING OF CONCERNS

When a child shares that they have been or are being abused including exploitation and neglect, they may feel ashamed, especially if the abuse is sexual, and may feel frightened lest their abuser finds out they have sought help and support from a professional. The child

may have been threatened and may have lost all trust in adults; or they may believe that they are to blame for the abuse. Sometimes the child may not understand that what is happening is abusive.

All staff should reassure children that what they are sharing is being taken seriously and that they will be supported and kept safe. A child should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a child ever be made to feel ashamed for making a report.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. During their conversations with the pupils, staff will:

- allow the child to speak freely
- remain calm
- allow silences
- refrain from asking leading questions
- tell the pupil what will happen next
- inform the DSL as soon as possible
- seek support from their line manager if they feel distressed.

CONFIDENTIALITY AND SHARING INFORMATION

Staff should never assume a colleague or another professional will take safeguarding action through the sharing of information that might be critical in keeping children safe. Staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Serious Case Reviews have highlighted failures in safeguarding systems in which people did not share information at the earliest opportunity or did not share at all. If in any doubt about sharing information, staff should speak to their Designated Safeguarding Lead or a deputy.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

All staff should understand that safeguarding requires a high level of confidentiality. Staff should only discuss concerns with the DSL, Deputy DSL or the headteacher.

Any member of staff can contact children's social care if they are concerned about a child but should inform the DSL as soon as possible that they have done so.

Staff will have due regard for the Data Protection Act 2018 and General Data Protection Regulation (GDPR) to ensure that personal information is processed fairly and lawfully and they will adhere to the seven golden rules for sharing information. Information sharing will take place in a timely and secure manner.

The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, as safeguarding and protecting children provide a legal basis for sharing information.

Staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Serious Case Reviews have highlighted failures in safeguarding systems in which people did not share information at the earliest opportunity or did not share at all.

Any member of staff can contact children's social care if they are concerned about a child but should inform the DSL as soon as possible that they have done so.

Staff ensure that confidentiality protocols are followed and information is shared appropriately. All staff will understand that safeguarding requires a high level of confidentiality. Staff should only discuss concerns with the DSL, Deputy DSL, Head of School or Executive Head.

The Executive Head, Head of School, the Designated Safeguarding Lead and the Deputy Designated Safeguarding leads will disclose any information about a pupil to other members of staff on a need to know basis only. The DSL will have due regard for the Data Protection Act 2018 and General Data Protection Regulation (GDPR) and will adhere to the golden rules for sharing information:

Golden Rules for Information Sharing

1. **Remember that the Data Protection Act is not a barrier to sharing information** but provides a framework to ensure that personal information about living persons is shared appropriately.
2. **If there are concerns that a child may be at risk of significant harm or an adult at risk of serious harm**, then it is your duty to follow the relevant procedures without delay. Seek advice if you are not sure what to do at any stage and ensure that the outcome of the discussion is recorded.
3. **Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

4. **Seek advice** if you are in any doubt, without disclosing the identity of the person where possible.
5. **Share with consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You should go ahead and share information without consent if, in your judgement, that lack of consent can be overridden in the public interest, or where a child is at risk of significant harm. You will need to base your judgement on the facts of the case.
6. **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
7. **Necessary, proportionate, relevant, accurate, timely and secure:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
8. **Keep a record** of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Our approach to working with parents/carers is one of transparency and honesty and the school's responsibility is to safeguard and promote the welfare of all the pupils in its care. We aim to do this in partnership with its parents/carers. In most cases parents and carers will be informed when concerns are raised about the safety and welfare of their child. Parents and carers should be given the opportunity to address any concerns raised.

The school will make every effort to inform parents and carers if a referral is to be made to an external agency. Where this has not been possible, and the welfare of the child is considered at risk, or where requesting consent is considered to put the child at further risk of imminent harm, information will be shared without consent. In such cases the Designated Safeguarding Leads, the Strategic Safeguarding Lead or the head of school will seek advice from the Borough's Children's Social Services team.

We will not allow fears about sharing information to stand in the way of the need to promote the welfare and protect the safety of children. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. We understand our responsibilities to process personal information fairly and lawfully and to keep the information we hold safe and secure, but will not let that become a barrier to sharing information when the failure to do so would result in risk of harm.

Information sharing decisions will be recorded and Child protection information will be stored securely separate from the pupil's school file, both in confidential online systems and in hard copy. Child protection information is stored and handled in line with the school's Retention and Destruction Policy.

All staff and volunteers must understand that they have a professional responsibility to share information in order to safeguard pupils. This includes sharing any information with their line managers or the headteacher where their relationships and associations both within and outside of the workplace (including online) may have implications for the safeguarding of children in school. It also includes sharing information with other agencies, where that is necessary to safeguard the child. Information sharing will take place in a timely and secure manner. The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, as safeguarding and protecting children provide a legal basis for sharing information.

We have developed effective links with other relevant agencies and co-operate as required with any enquiries regarding child protection issues. The school will notify relevant external agencies if:

- A child subject to a child protection plan is about to be excluded.
- There is an unexplained absence of a pupil who is subject to a child protection of more than two days from school.
- It has been agreed as part of any child protection plan or core group plan.

Staff should never assume a colleague or another professional will take safeguarding action through the sharing of information that might be critical in keeping children safe. Staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Serious Case Reviews have highlighted failures in safeguarding systems in which people did not share information at the earliest opportunity or did not share at all. If in any doubt about sharing information, staff should speak to their Designated Safeguarding Lead or a deputy.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

All staff should understand that safeguarding requires a high level of confidentiality. Staff should only discuss concerns with the DSL, Deputy DSL or the head of school.

Any member of staff can contact children's social care if they are concerned about a child but should inform the DSL as soon as possible that they have done so.

Information sharing decisions will be recorded, whether or not the decision to share has been taken. Child protection information will be stored securely separate from the pupil's school file. Child protection information is stored and handled in line with the school's Retention and Destruction Policy. Where safeguarding information is stored electronically and online, the school has cybersecurity measures in place, which meets the Department for Education's Cybersecurity Standards, to ensure the data is safe and not vulnerable to evolving cyber-crime.

REFERRING TO CHILDREN'S SOCIAL CARE

The DSL will make a referral to children's social care applying the **THSCP Levels of Need** Guidance if it is believed that a pupil is suffering or is at risk of suffering significant harm, or the child is considered to be in need, that is 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.

LBTH Multi-Agency Safeguarding Hub:

020 7364 5006 (Option 3) 020 7364 5601/5606

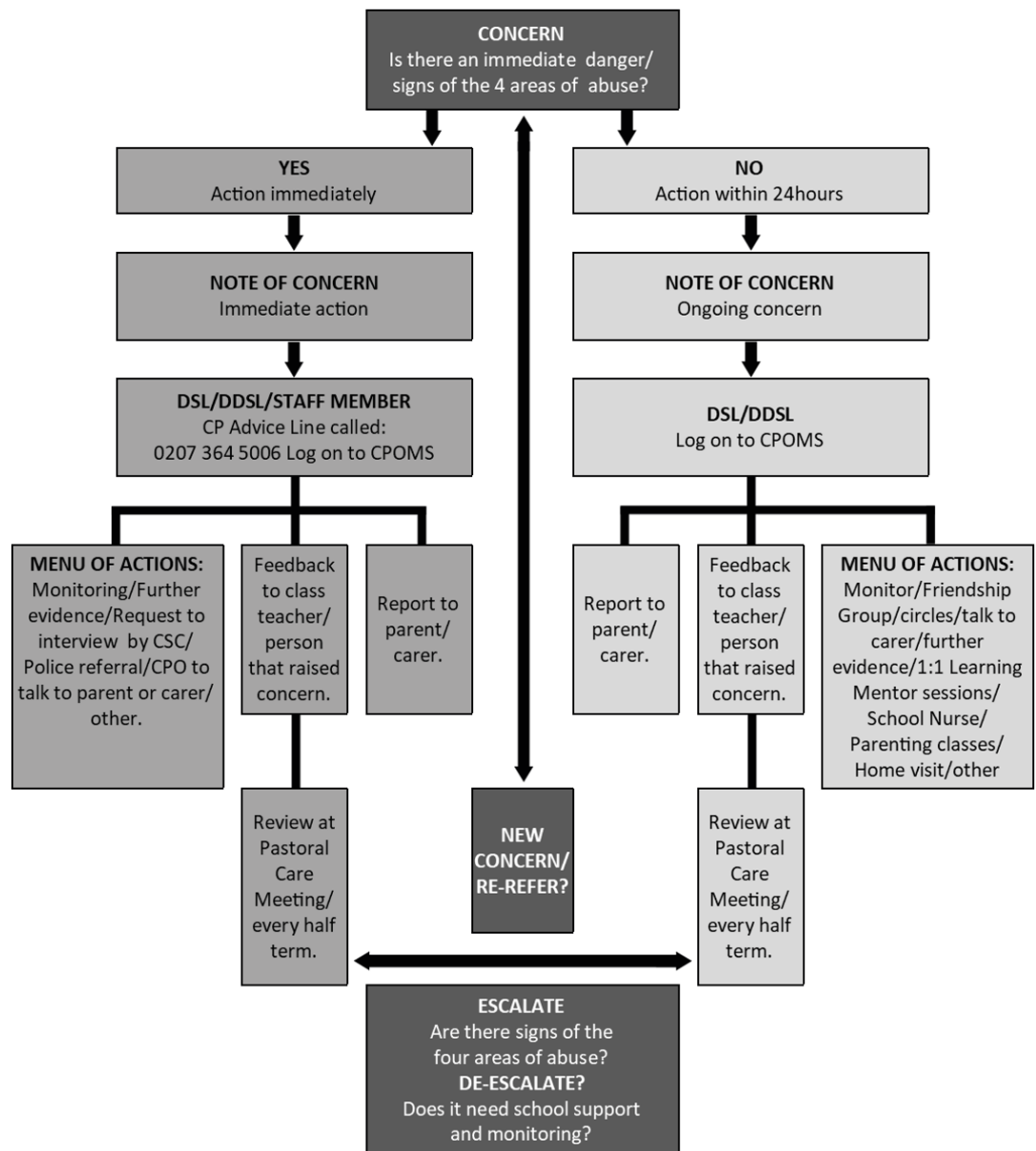
Child Protection Advice Line:

020 7364 3444

The DSL will contact CPAL/MAST in the first instance to seek advice and guidance. When the DSL completes a MAST Request for Support form and sends it securely to the Multi-Agency Support Team, the referral form will be accurate and sufficiently detailed to enable the MAST Assessment and Intervention Team to make a decision on the level of response required in accordance with the THSCP Levels of Need Guidance.

If the child is already known to Children's Social Care, then the DSL will communicate safeguarding concerns to the allocated Social Worker.

How we handle a safeguarding concern:



ESCALATION PROCEDURES

If, after a referral to Children's Social Care, the child's situation does not appear to be improving, the DSL will consider following local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

In accordance with the [THSCP Multi-Agency Escalation and Resolution Policy](#) the DSL will first make contact in writing with the team manager followed by the service manager followed by the divisional director. At every level of escalation there should be discussion and concerted effort to resolve any professional difference. It is important that the DSL at each point of escalation puts the concerns in writing.

Appendix

Appendix 1: MAST Poster

Appendix 2: School Record of Concern Form (if not online)

Appendix 3: [MAST Request for Support Form](#)

APPENDIX 1:

Multi-Agency Support Team (MAST)

020 7364 3444 / 5601 / 5606 / 5358 / 7796

If there is a concern about the welfare of a child or young person and you would like to talk it through then you should contact the Tower Hamlets Children Services' Multi-Agency Support Team (MAST).

The Duty Officer will be able to discuss the concern, assist in deciding whether a referral is appropriate and facilitate the reporting of a referral in accordance with Tower Hamlets Safeguarding Children Partnership (THSCP) Procedures and to offer advice.

When there is a specific concern of a child protection nature whereby it is thought that a child has been harmed or at risk of being harmed then the MAST should then be contacted on 0207 364 3444 / 5601 / 5606 / 5358 / 7796 in the first instance to discuss the matter followed by the completion of the [LBTH MAST Request for Support Form](#) to MAST@towerhamlets.gov.uk.

The MAST operates between 9.00am and 5.00pm except at weekends and on public holidays. If the concern arises outside of the hours operated by the MAST and it is believed the child may be at immediate risk the Children's Social Care Emergency Out of Hours Duty Team or the Police should be contacted without delay.

Important contact information:

The Multi Agency Support Team (MAST) Note – information should only be emailed following prior discussion with the Duty Officer.	MAST@towerhamlets.gov.uk
Children's Social Care Emergency Out of Hours Duty Team (5.00pm onwards)	020 7364 4079

LOCAL AUTHORITY DESIGNATED OFFICER FOR ALLEGATIONS (LADO)

Melanie Benzie

Tel: 020 7364 0677

Email: LADO@towerhamlets.gov.uk

APPENDIX 2:

Multi Agency Support Team (MAST) Request for Support Form

If you are concerned about a child or family, use this form to get support from the team at Tower Hamlets Council and our partners.

You can expect feedback within 24 to 48 hours upon submission of this referral form. We are dedicated to actively collaborating with you and other relevant services to guarantee every child receives the necessary support.

**Please indicate the relevant option by placing a tick in the corresponding box.*

Agency

We work with several agencies and partner organisations in Tower Hamlets.

Do you work for an agency or partner organisation?

Yes		No	
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Anonymous reporting

If you are not working for an urgency or partner organisation, do you want to make this referral anonymously? If you are reporting anonymously, by reporting this anonymously we will not be able to email you conformation of the report and will not be able to let you know about the outcome.

Yes		No	
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Consent

If a child is giving consent, they must be over 16.

Someone with parental responsibility is an adult who is a biological parent or an adult that has a court order to care and make decisions about the welfare of the child daily

Child over 16		Someone with parental responsibility		Neither	
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If you have selected 'Neither,' Consent should be given by the child or family before making a referral, unless the child is at risk of immediate significant harm.

Is the child at risk of immediate significant harm?

Yes		No	
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What's your name (if you are not reporting anonymously)?

What is your first name?	
What is your last name?	

Referrer's agency

What agency do you work for?

Name and Details	
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What is your role at your Organisation/ Institute?

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What is your phone number?

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What is your email address?

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Child's name

What is the child's first name?	
What is the child's last name?	

Date of Birth

Do you know the date of birth of the child?	Yes		No	
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Date of Birth or expected date of birth.	Day		Month		Year	
Sex at Birth	Male		Female		Not Known	

Child's ethnicity

What is child's ethnic group?

Choose from the following: English, Welsh, Scottish, Northern Irish, British, Irish, Gypsy or Irish Traveler, Roma, Any other White background, White and Black Caribbean, White and Black African, White and Asian, Any other Mixed or Multiple background, Bangladeshi, Pakistani, Indian, Chinese, Any other Asian background, Caribbean, Somali, Other African, Any other Black, Black British or Caribbean background, Arab, Other, Prefer not to say, Don't know.

Child's religion

What is the religion of the Child?

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Choose from the following: Christian, Muslim, Hindu, Buddhist, Sikh, Prefer Not to say, Don't Know, No Religion, Other.

Does the child have a disability or special educational need?

Yes		No		Don't Know	
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Child's Education

Is Child being educated?

Yes, at School	
Home schooled	
Not in education	
Don't know	

Name of the School:

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Child's Address

Do you know the child's address?	Yes		No	
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If 'Yes', provide the following	
Postcode	
Address	

Child's first Language

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Choose from the Following: Don't know, English, British Sign Language, Bengali, Italian, Spanish, French, Portuguese, Chinese, Polish, Romanian, Greek, Russian, Arabic, Somali, German, Turkish, Other (Please Mention)

Sign language

We are able to offer a British Sign Language interpreter to anyone who needs it.

Does Child need a British Sign Language interpreter?	Yes		No		Don't Know	
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Child's immigration status

What is child's immigration status?

British or Irish citizen, habitually resident in UK, Ireland, Channel Islands, or Isle of Man, or deported from another country	
EEA citizen residing in the UK prior to 31 December 2020: worker	
EEA citizen residing in the UK prior to 31 December 2020: self-employed	
EEA citizen residing in the UK prior to 31 December 2020: settled status	
EEA citizen residing in the UK prior to 31 December 2020: other	
EEA citizen residing in the UK prior to 31 December 2020: A family member of one of the above groups	
Non-UK: Granted refugee status	
Non-UK: Exceptional Leave to Remain	
Non-UK: Indefinite Leave to Remain	
Non-UK: Limited Leave to Remain	
Non-UK: Other protection (e.g. humanitarian, discretionary, family of Northern Ireland and stateless persons under Immigration rules)	
Don't know	

Is child a young carer?	Yes		No		Don't Know	
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What is child's NHS number? (Optional)	
What is child's unique pupil number? (Optional)	

Has child or their family ever been the subject of a Children Social Care assessment?

Yes		No		Don't know	
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Is there a Private Fostering agreement for child?

Yes		No		Don't know	
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Are there any other children in the household?

Yes		No		Don't know	
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Number of other children	
How many other children are there in the household?	

Other children's information

Child's first name	
Child's last name	

Is there a Private Fostering agreement for Child	Yes		No		Don't know	
Do you know Child's date of birth?	Yes		No			

Date of Birth	DD		MM		YYYY	
Child's Sex	Male		Female		Don't know	

What is Child's ethnic group?	
What is Child's religion?	

Does Child have a disability or special educational need?	Yes		No		Don't Know	
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Is Child being educated?

Yes, at School	
Home Schooled	

Not in Education	
Who provides education for Child?	

Has Child previously been referred to Children's Services?	Yes		No		Don't Know	
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What is Child's first language?	
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Does Child need an interpreter to translate for them?	Yes		No		Don't Know	
Does Child need a British Sign Language interpreter?	Yes		No		Don't Know	

What is Child's immigration status?	
What is Child's NHS number? (Optional)	
What is Child's unique pupil number? (Optional)	

Principal carer's details

Do you know child's principal carer's information?	Yes		No	
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Principal/main carer

The person who has most parenting time with child

Principal carer's first name	
Principal carer's last name	
Principal carer's relationship What is Principal carer's relationship to child	
Parent	
Guardian	
Carer	
Other Family Member	
Other	

Principal carer's sex

Male		Female		Not Known	
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Do you know the principal carer's date of birth?	Yes		No	
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Principal carer's date of birth	DD		MM		YYYY	
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Principal carer's ethnicity

Choose from the following: English, Welsh, Scottish, Northern Irish, British, Irish, Gypsy or Irish Traveler, Roma, Any other White background, White and Black Caribbean, White and Black African, White and Asian, Any other Mixed or Multiple background, Bangladeshi, Pakistani, Indian, Chinese, Any other Asian background, Caribbean, Somali, Other African, Any other Black, Black British or Caribbean background, Arab, Other, Prefer not to say, Don't know.

Principal carer's first language

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Don't know, English, British Sign Language, Bengali, Italian, Spanish, French, Portuguese, Chinese, Polish, Romanian, Greek, Russian, Arabic, Somali, German, Turkish, Other (Please Mention)

Principal carer's contact number

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Principal carer's sign language

Does Principal carer need a British Sign Language interpreter?

Yes		No		Don't know	
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Does child have another parent, guardian or carer in their household?

Yes		No		Don't know	
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If the child has another parent, guardian or carer in their household, do you know the other parent, guardian or carer's details?

Yes		No	
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If 'Yes', please fill the following details

Other parent, guardian, or carer details	
Other parent's first name	

Other parent's last name	
Relationship to the child and contact number	
Parent	
Guardian	
Carer	
Other family member	
Ethnic group	

Are there any other significant people in child's life. Other significant people in the child's life, this might be grandparents, aunts, uncles, or other family members.

Yes		No		Don't know	
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If the child has any other significant people in child's life, details of the person.

What is this person's first name?	
What is this person's last name?	
What is the relationship to child	
Parent	
Guardian	
Carer	
Other family member	
Other (Please mention)	

Has anyone in the household ever had a Child Protection Plan?

Yes		No		Don't know	
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If anyone in the household ever had a Child Protection Plan, please provide details of the person with a Child Protection Plan, dates and all relevant information.

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Has anyone in the household ever been looked after by a local authority?

Yes		No		Don't know	
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Child looked after by a local authority details

Please provide details of name of person being looked after, dates and all relevant information

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Child in need

Under Section 17 Children Act 1989, a child is considered “in need” if:

- They are unlikely to achieve or maintain a reasonable standard of health or development without services from the Local Authority.
- Their health or development is likely to be significantly impaired without such services.
- They have a disability, which includes conditions like blindness, hearing impairments, mental disorders, and permanent illnesses or congenital deformities

Has anyone in the household ever been a ‘child in need’?

Yes		No		Don’t know	
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Child in need details

Which children are or were considered to be a 'child in need? Please tell us the name of the child, the dates they were in need and any other relevant information.

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Early help

‘Early help’ describes any service that supports children and families as soon as problems emerge.

Has anyone in the household ever received support from Early Help?

Yes		No		Don’t know	
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Early help details

Which children are or were receiving 'early help? Please tell us the name of the child, the dates they were receiving early help and any other relevant information.

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Are any other agencies or professionals working with the family?

Yes		No		Don’t know	
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If 'Yes', please provide the following

What is the name of the professional working with the family?
What is the role of the professional working with the family?
What is the name of the agency or organisation working with the family?
What is the contact email address for this agency or organisation?
What is the contact phone number for this agency or organisation?

Level of need

More information on level of need: [The Four Levels of Need](#)

Level 1: No Additional Needs	
Level 2: Early Help	
Level 3: Children with Complex Multiple Needs	
Level 4: Children in Acute Need	
Don't know	

Family strengths

What is currently working well for the child and family? Share positive aspects or abilities within the family that can be further supported.

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Worry

What are you most worried about?

Describe your concerns for the family or any issues that require assistance or support

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Further information

Please provide us with any further information about the child's development and any other presenting issues.

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Current situation

How safe do you think child is? On a scale of 0 to 10 where 0 means the child is at risk of harm and 10 means the child is safe.

0 1 2 3 4 5 6 7 8 9 10

Please tell us how you reached this score?

Action

Please tell us if any action has taken place to help the family resolve the difficulties, they are experiencing

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Supporting documents

Do you have any relevant supporting documents, like assessments or the latest review that you would like to upload?

(Attach and submit the files)