

*Tower Hamlets Education Safeguarding Service has provided this policy structure guide to assist schools when reviewing their Child Protection Policy before ratification by the Governing Body or Trustees. If schools decide to use this policy structure, then they should ensure that the resulting policy is tailored to the school setting and individualised. The responsibility remains with the Governing Body or Trustees to ensure that the Child Protection Policy is compliant and effective for the school setting.*

# HALLEY PRIMARY SCHOOL CHILD PROTECTION POLICY

September 2023



## OUR INTENT

### OUR VALUES



### OUR VISION

Provide a safe, supportive, and stimulating environment that enables and encourages highest standards of achievement (**ambition**).

Broad, balance and **creative** curriculum which makes the most of the learning opportunities offered by the richness and diversity of the **cultures** and environment on our doorstep.

Provide an **enriched practical** curriculum based on excellence and **enjoyment** that allows for **exploration, enquiry,** and opportunities to ask questions.

### OUR AIMS

- 1 All of our children to become **successful independent** learners.
- 2 All of our children are equipped with skills and knowledge to meet their current and future needs and **creative** potential.
- 3 All of our children are **confident** individuals who can live safe and **healthy** lives.
- 4 All of our children **respect** and value each other's contributions, irrespective of race, gender, religion or ability.
- 5 All of our children are **self-aware** and able to manage their own behaviour understanding it has an impact on others.
- 6 All of our children are active and motivated **citizens** within the wider school community.

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The School aims to develop an atmosphere in which children feel secure, in which their viewpoints are valued, and in which they are encouraged to talk and listen to each other.

As a UNCRC Rights Respecting Schools, Halley promotes the United Nations Convention on the rights of the Child (UNCRC). All articles are of equal importance but for this policy we prioritise UNCRC

**UNCRC Article 12** Children have the right to be looked after, kept safe from harm and know what to do if they need support.

All opinions or behaviours which are contrary to the values and the ethos of the School will be vigorously challenged.

For the safeguarding procedures to work, it relies on the commitment and expertise of every adult within the School to be able to recognise or report concerns. Therefore, we aim to have a School where:



- **There is a belief that ‘it could happen here’.**
- There are clear procedures for reporting concerns.
- There is a commitment to take action in relation to concerns raised.
- There is a set of standards for professional conduct.
- Child protection is part of induction training.
- There is an ongoing culture of vigilance.

The school aims to ensure that:

- An ethos in which children feel safe and secure, their views are valued and they are encouraged to talk and listen.
- Appropriate action is taken in a timely manner to safeguard and promote children’s welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

This Policy sits alongside several other policies which include reference to Safeguarding practices (Staff Safer Care and Code of Conduct, Recruitment Policy, Allegations against staff, Complaints Policy, Visitor Policy as well as Pupil Behaviour for Learning and the Online Safety Policy). The policy will be reviewed annually by the Governing Body unless an incident or sooner if there are significant changes to guidance.

This Safeguarding Policy is available on the school website, the shared 'Teacher' drive and the school Office. The policy will be reviewed at least annually unless an incident, new legislation or guidance calls for the need for a review.

Procedures within this policy apply to all staff, volunteers, visitors and governors. All procedures have been written in accordance with Keeping Children Safe in Education 2022 and Tower Hamlets Safeguarding Children Partnership supplementary guidance (THSCP) on Child Protection Procedures and the Management of Allegations.

## 1. CORE SAFEGUARDING PRINCIPLES

- The welfare of the child is paramount and underpins all discussions, decision making, and actions taken at the school.
- All concerns disclosed and reported 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 disclosure 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; its safeguarding policies, procedures and systems; and underpin the whole school approach to safeguarding at **Halley Primary School**.

## Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).



EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.



LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
[Academies] MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single Central Record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.

VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.
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## 2. PURPOSE OF POLICY

- 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/carers and other partners.

## 3. SAFEGURDING LEGISLATION AND GUIDANCE

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

### Legislation

- Section 175 of the Education Act 2002 (maintained schools only)
- Section 157 of the Education Act 2002 (Independent schools only, including academies and Free Schools)
- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguarding Children 2018 (Updated July 2022)
- [Keeping Children Safe in Education 2022 \(1 September 2023\)](#)
- What to do if you’re worried a child is being abused 2015
- [Statutory Framework for the Early Years Foundation Stage \(1 September 2021\)](#)
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Sexual Offences Act 2003
- UKCIS Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People (December 2020)

- Sexual Violence and Sexual Harassment between Children in Schools and Colleges: Advice for Schools and Colleges on how to prevent and respond to reports of sexual violence and harassment between children (Updated July 2021)
- The Teacher Standards 2012

### Statutory guidance

- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- **DfE (2022) 'Keeping children safe in education 2023'**
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

### Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2022) 'Recruit teachers from overseas'

## 4. TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP SUPPLEMENTARY SAFEGUARDING GUIDANCE

The following THSCP safeguarding guidance has informed the content of this policy:

- **London Child Protection Procedures revised 7th Edition (London Safeguarding Children Board, 31<sup>ST</sup> March 2023)**
- Tower Hamlets SCP Multi-Agency Safeguarding Thresholds Guidance

- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Child Protection Procedures - September 2023
- 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 – September 2023

## 5. 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:

<http://www.childrenandfamiliestrust.co.uk/the-lscb/>

The School has been named as a ‘relevant agency’ and as such is under a statutory duty to cooperate with the THSCP arrangements.

The School will engage with the borough’s Designated Safeguarding Lead Forums, co-operate with the Rapid Review process and any Local Learning Reviews,<sup>1</sup> participate in the THSCP multi-agency safeguarding training offer, and co-operate with the borough’s Section 175/157 School Safeguarding Audit cycle.

## 6. KEY DEFINITIONS

Safeguarding and promoting the welfare of children is:

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<sup>1</sup> For more information on the Rapid Review process, Local Learning Reviews and Child Death Reviews, Working Together 2018 Chapters 4 and 5 should be consulted. Working Together 2018 paragraphs 25-27 provide more information on the expectation of school’s role within the safeguarding partnership arrangements.

- protecting children from maltreatment
- preventing the impairment of a child's physical and mental health or development
- 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/ren** 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.

**Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause 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.

For the purposes of this policy, "**sexual harassment**" refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.

- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
  - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
  - Sharing unwanted explicit content.
  - Upskirting.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including on social media.
  - Sexual exploitation, coercion, and threats.

For the purposes of this policy, “**upskirting**” refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the “**consensual and non-consensual sharing of nude and semi-nude images and/or videos**”, colloquially known as “**sexting**”, is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, “**indecent imagery**” is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

## 7. ROLES AND RESPONSIBILITIES

The Governing Body/Trustees/Proprietor 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 Keeping Children Safe in Education, and ensure 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.

In accordance with the statutory requirement the named member of the Governing Body who takes leadership responsibility for safeguarding at the school is **Keith Clarke** and they are referred to as the Safeguarding Link Governor.



The Headteacher is responsible for ensuring that the school’s Child Protection Policy and other safeguarding 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 the school on a day-to-day basis, **including online safety and understanding the filtering and monitoring systems and processes in place.** During school closures (holidays) safeguarding queries are directed to the Child Protection Advice Line.

ROLE	POSTHOLDER	CONTACT DETAILS	TRAINING
Headteacher Designated Safeguarding Lead	Shoshannah Thompson	020 7265 8061 or <a href="mailto:head@halley.towerhamlets.sch.uk">head@halley.towerhamlets.sch.uk</a>	Valid
Deputy Headteacher Designated Safeguarding Lead (DDSL)	Rebecca Stainsby	020 7265 8061 or <a href="mailto:rstainsby@halley.towerhamlets.sch.uk">rstainsby@halley.towerhamlets.sch.uk</a>	Valid
Assistant Headteacher Inclusion & SEND Lead (DDSL)	Shan Hardy	020 7265 8061 or <a href="mailto:shardy25.211@halley.towerhamlets.sch.uk">shardy25.211@halley.towerhamlets.sch.uk</a>	Valid
Safeguarding Link Governor	Keith Clarke	<a href="mailto:keith.a.g.clark@gmail.com">keith.a.g.clark@gmail.com</a>	Valid

All staff should recognise that as frontline workers they are in an 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. This should be done either face to face or via CPOMS without delay. For those without access to CPOMS, then making contact with the DSL or Deputy DSLs should be done immediately. (pg. 46-47 Staff Handbook).

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

All **staff** have a responsibility to:

- Consider, **at all times**, what is in the best interests of the pupil.
- Maintain an attitude of '**it could happen here**' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- **Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.**
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.

**Teachers, including the headteacher, have a responsibility to:**

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.

If any member of staff is concerned about a child, they must inform one of the Designated Safeguarding Leads (listed above). The DSLs are most likely to have the

complete safeguarding picture and be the most appropriate people to advise on the response to safeguarding concerns' (KCSIE23).

- Information regarding concerns must be recorded immediately on the school CPOMs system and referred to a Designated Safeguarding Lead (DSL).
- The concern must be recorded immediately on the same day using the CPOMS online recording system. The recording must be a clear, precise, factual account of the observation.
- The designated officer to whom the report has been directed will abide by the guidance of the Local Safeguarding Children Board, and may refer the matter to the Multi-Agency Safeguarding Hub (MASH) in Tower Hamlets Children's Social Care. The DSL must be briefed before a referral is made. In some circumstances, parents may be notified, but staff should not notify parents in advance if there is any risk of:
  - (a) further endangering the child or children involved;
  - (b) compromising the integrity of any evidence which may later be used in court, (c) causing any alleged perpetrator of child abuse to be protected from investigation.
- Only Designated Safeguarding Leads should make decisions about when to disclose Child Protection issues to parents and other staff must assume that information about Child Protection issues is strictly confidential, and act accordingly.
- If a referral is made to MASH, the designated officer will ensure that a written report of the concerns is sent to the social worker dealing with the case within the time specified by MASH (as identified – high, medium or low risk cases).
- Particular attention is paid to the attendance and development of any child who has been identified as 'at risk' or who has been made subject to a Child Protection Plan.
- If a pupil about whom safeguarding concerns have been raised changes school, one of the designated officers will inform the social worker responsible for the case (if there is one), transfer the appropriate records to the receiving school, and provide specific information relating to support and wellbeing where appropriate.
- Staff who have ongoing concerns about 'poor or unsafe practice and potential failures in the school's safeguarding regime' (KCSIE2022) should follow the

protocols described in the school's **Whistleblowing Policy**. There is also an NSPCC Whistleblowing helpline, available at 0800 028 0285 or by email at [help@nspcc.co.uk](mailto:help@nspcc.co.uk).

- If in doubt about any safeguarding matter, staff should always speak to the DSL or any member of the Senior Leadership Team.

All staff are expected to keep safeguarding values at the core of their daily conduct. The best interests of the child should determine their decision making, behaviour and any action taken.

The **governing board** has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children](#)'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part one of **KCSIE 2023**.
- Ensure that staff who do not work directly with children read either Part one or Annex A of **KCSIE 2023**. **NB:** Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior leader takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.

- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- **Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.**
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in

regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.

- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- **Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.**

The **headteacher** has a duty to:

- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.



### The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns. **NB:** Individual schools, working with the DSL, define what “available” means and whether, in exceptional circumstances, availability via phone, videocall, or other media is an acceptable substitution for in-person availability.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
  - **To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.**
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs’ Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and

child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:

- Ensuring that the school knows which pupils have or had a social worker.
  - Understanding the academic progress and attainment of these pupils.
  - Maintaining a culture of high aspirations for these pupils.
  - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
  - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
  - Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
    - Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
    - Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
    - Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
    - Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
    - Undergo training, and update this training at least every two years.
    - Obtain access to resources and attend any relevant or refresher training courses.
    - Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
    - Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

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.

## 8. 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.

Staff are encouraged to read the Whistleblowing Policy as part of Induction and the annual instruction to read updated safeguarding documents.

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 including:

The NSPCC Whistleblowing Advice Line 0800 028 0285 which is free & anonymous, more information can be found at [nspcc.org.uk/whistleblowing](https://www.nspcc.org.uk/whistleblowing).

## 9. ALLEGATIONS AGAINST STAFF & REPORTING OF 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 2023 Part 4 and the THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – September 2023](#).

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 Headteacher and ensure that it is put in writing, signed and dated. If the subject of the allegation is the Headteacher, 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.

**LBTH Local Authority Designated Officer (LADO):** Melanie Benzie

**Email:** [Melanie.Benzie@towerhamlets.gov.uk](mailto:Melanie.Benzie@towerhamlets.gov.uk) or [LADO@towerhamlets.gov.uk](mailto: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 on, 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.

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.

## 10. 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 in place.

Governors will be invited to join school safeguarding training sessions and there will be a standing Safeguarding Update at each Full Governing Board meeting.

As part of Induction, the following policies are shared and explained to all staff:

Child Protection & Safeguarding Policy (including safeguarding response to children who go missing from education; and name and role of the Designated Safeguarding Lead and the Deputies)

- Staff Code of Conduct

All new members of staff are provided with a Staff Handbook and Termly Action Plan that provides succinct outline of key policies and procedures.

A copy of Keeping Children Safe in Education 2023 (Part 1) is provided at Induction (including volunteers).

These policies and documents are shared annually in September (a refresher session) and all staff are required to read them and provide signed declaration stating they have read and have understood these. The HR and Office Manager will maintain a Safeguarding Training Register to ensure that all staff are appropriately trained.

All staff are provided with statutory safeguarding and child protection triennially.

All staff will have regular training and weekly updates (within phase and whole school briefings). These areas include:

- Child protections procedures, the Child Protection Policy, KCSIE Part 1 and the Code of Conduct;
- Updates on changes to legislation, policy and procedures in the area of child protection;
- Specific guidance in recognising signs of abuse, Peer on Peer, FGM, child trafficking and exploitation, child sexual exploitation, child at risk from extremism and radicalisation, domestic violence, e-safety (use of ICT, the internet and social media), forced marriage, violence against women and girls, involvement in gangs, drugs and neglect;
- Training on procedure and processes for making referrals and what to do if child makes a disclosure.
- Professional conversations to ensure there is an ongoing culture of vigilance.
- Copies of all policies are accessible on the School shared W drive and the School website. Hard copies are kept staffroom and main office.
- DSL/DDSL undergo regularly (termly) training to ensure they have the knowledge and skills required to carry out the role.

## 11. VISITORS

If the visitor is unknown to the School, we will check their credentials and reasons for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in using the electronic Inventory system and wear a visitor's badge to identify themselves to school staff.

Staff challenge unidentified visitors on site and report all unregistered visitors to the Headteacher, LADO and Local Authority.

Visitors to the School who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:



- Will be asked to show their DBS certificate, which will be checked alongside their photo ID;  
or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the School any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

- The School monitors the activities of any clubs or groups operating under the name of the School, or using its premises or facilities.
- Family visitors are welcomed on site by staff for organised staff supervised events.

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](#).

All visitors to the school will be given a leaflet with advice on safeguarding procedures at [Halley Primary School \(See Appendix 5\)](#).

## 12. EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

The school's Educational Visits Coordinator (EVC) is Shan Hardy and will coordinate all residential and off-site activities. These are planned in accordance with the School's Trips and Visits Policy. The process of risk assessment and trip permission prior to the activity taking place ensures that the school is assured that safeguarding arrangements are in place.

All residential or extended school visits are risked assessed through EVOLVE processes and are subject to approval by Headteacher and Local Authority. Trip planning for visits off-site include consideration of the venue's own risk assessments. All safeguarding checks are adhered to according to EVOLVE check lists to ensure effective safeguarding arrangements are in place for any extended, residential off-site visits.

Where services or activities are provided separately by another organisation **outside of the 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 these external organisations, when they are not currently regulated, are set out in the Department for Education’s Keeping Children Safe during community activities, after school-clubs and tuition: non-statutory guidance for providers running out-of-school activities (April 2022).**

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.

### 13. 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 **immediately** as soon as possible to the DSL, **this takes priority over all other activity for School staff.**
- 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 **using CPOMs. Recordings must be clear, precise, factual account of the observation. If CPOMs is not accessible then a member Safeguarding/SLT team should be contacted as a matter of urgency.**
- seek support for yourself if you are distressed.

### 14. 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 under section CHILDREN WHO MAY BE POTENTIALLY MORE AT RISK OF HARM on page 34 of this policy.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

When there is multi agency support in place for a child in the form of an Early Help Assessment and Team Around the Family meetings, the DSL will consider whether to refer to the borough's Social Inclusion Panel to aid with coordination of support, when requiring support and advice, and to help prevent escalation to Level 3 Needs: [This.Child@towerhamlets.gov.uk](mailto:This.Child@towerhamlets.gov.uk)

The DSL will contact the LBTH Early Help Hub for support and advice if required:

**LBTH Early Help Hub:**  
0207 364 5006 (option 2)

Alternatively, the DSL will complete an Early Help Enquiry form which can be accessed via <https://bit.ly/2AA2WNy>

### Social Inclusion Panel

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 LBTH Thresholds 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 Safeguarding Hub (MASH) for a discussion.

**MASH:**  
020 7364 5006 (Option 3) 020 7364 5601/5606

**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.

## 15. 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.

Where appropriate, we will discuss any concerns about a child with the child's parents. This will usually only happen after a call to CPAL and following their advice about whether a parent/carer should be contacted or not.

The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of **all** the children involved.

## 16. 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.

*'All schools have a clear responsibility placed on them by the Children Act 1989 and by DfE guidance to safeguard the welfare of all pupils. In doing so, schools are expected to with Children's Social Care if they believe there is a possibility that a child may be suffering from abuse or neglect.'*

*'A referral to Children's Social Care is not intended to be an accusation of any particular action or against any particular person. It is the reporting of concerns which have come to the School's attention. This is in accordance with Tower Hamlets Local Safeguarding Children Board's Child Protection Procedures.'*

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.

The DSL will have due regard to 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.

Where confidentiality or anonymity has been breached, the School will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

The School aims to work alongside associated professionals from a range of disciplines – including social care, health and so on – to ensure the safety and wellbeing of the children in its care, and information is normally shared with these agencies with the consent of the person identified in or by the information.

We presuppose that the adult with the authority to decide about the disclosure of a child's information is their parent or legal guardian. In some circumstances, where a child or vulnerable person has suffered or is at risk of suffering significant harm, the school may legally share information with other services without the consent of the relevant individual.

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.

## 17. REFERRING TO CHILDREN'S SOCIAL CARE

The DSL will make a referral to children's social care applying the LBTH Threshold 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/MASH in the first instance to seek advice and guidance. When the DSL completes a MASH referral form and sends it securely to the Multi-Agency Safeguarding Hub, the referral form will be accurate and sufficiently detailed to enable the MASH Assessment and Intervention Team to make a decision on the level of statutory response required in accordance [with the LBTH Thresholds Guidance](#).

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

See Appendix 3 for the Halley Primary School Safeguarding Flowcharts

### **Multi-agency working**

- The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.
- The school will be fully engaged, involved, and included in local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.
- The School will work with CSCS, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.
- Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.
- The School also recognises the particular importance of inter-agency working in identifying and preventing CSE.

### **Information sharing**

- The School recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.
- Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a

barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

- Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL, Deputy DSLs or Headteacher.

## 18. 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 Tower Hamlets Threshold Guidance (Appendix D) the DSL will first make contact 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 1: MASH Poster

Appendix 2: MASH Interagency Referral Form

Appendix 3: Tower Hamlets Safeguarding Children Partnership Supplementary Guidance of Education Settings

Appendix 4: Halley Primary School Safeguarding Flowcharts

Appendix 5: THSCP Managing Allegations Flowchart

## PART TWO - CHILDREN WHO MAY BE POTENTIALLY MORE AT RISK OF HARM

### 19. RIGHTS OF THE CHILD

The school upholds the human rights of the child in accordance with the Human Rights Act 1998.<sup>2</sup> 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:

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

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

**UNCRC Article 8:** the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity

**UNCRC Article 12:** Children have the right to be looked after, kept safe from harm and know what to do if they need support

**UNCRC Article 14:** requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination

**UNCRC 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). 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.

The School within the context of safeguarding and promoting the welfare of children, are committed to supporting all pupils with protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

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.<sup>3</sup> 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.<sup>4</sup> The action plan recognises that

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

<sup>4</sup> [https://www.towerhamlets.gov.uk/lqnl/community\\_and\\_living/Inequality-Commission/Black-Asian-and-Minority-Ethnic-Inequalities-Commission.aspx](https://www.towerhamlets.gov.uk/lqnl/community_and_living/Inequality-Commission/Black-Asian-and-Minority-Ethnic-Inequalities-Commission.aspx)

schools have a powerful and significant role in changing narratives and bringing about social change through education.

## 20. 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

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; is at risk of so-called honour-based abuse such as Female Genital Mutilation or Forced Marriage;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- 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 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.

## 21. 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.

## 22. 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. All staff 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.

If staff have concerns related to a parent or carer's mental health or a child's mental health, they should report this to a Designated Safeguarding Lead/Child Protection Officer and/or School's **Mental Health Lead** (Shan Hardy, AHT Inclusion and SEND Lead). In this way plans can be implemented to support all involved through starting an EHA with the family and involving appropriate external agencies e.g. Catholic Children's Society, CAHMS or THEWS (Tower Hamlets Educational Wellbeing Service)

## 23. LOOKED AFTER CHILDREN AND PREVIOUS LOOKED AFTER CHILDREN

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

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

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.

We have appointed a designated teacher, [Shan Hardy, AHT Inclusion and SEND Lead], who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children and Care Leavers, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

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.

## 24. SEND CHILDREN

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), 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 SEND children. All staff need to be aware that SEND children 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.

Staff are trained to understand and be aware of these additional barriers to ensure this group of children are appropriately safeguarded.

## 25. CHILDREN MISSING EDUCATION AND CHILDREN MISSING

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 wider range of safeguarding issues** 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 *Working together to improve school attendance*, the school follows up on absences and addresses persistent 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.**

The school follows up on absences as part of its safeguarding duty. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

As a day school, Halley, is required by law to have an admission register and an attendance register. All pupils must be placed on both registers. The School should hold more than emergency contact number for each pupil 'where reasonably possible'.

No pupil will be deleted from the admissions register under any of the following circumstances:

- Where a child has been taken out of school by their parents and is being educated outside the school system (e.g. home education);
- Where a child has ceased to attend school and no longer lives within reasonable distance of the school;
- Where a child is in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period; and,
- Where a child has been permanently excluded.

## **PROCEDURES FOR CHECKING ABSENCES WITHIN THE SCHOOL**

The registration is completed twice a day; every morning by 9:00am and by 1:15pm in the afternoon so that absence calls can be made as soon as possible to follow up on any unexplained absences.

The School will monitor 'blocks of absences' occurring for all children including those who are particularly vulnerable.

The School will monitor when a child applies for or does not return from extended leave in discussion with the AWA

The School will monitor those children with

- Unexplained absences are marked as unauthorised absence.
- If parents/carers fail to inform School of reason for absence, Attendance Lead will contact the parents/carers.
- If this is unsuccessful, the School will persist with alternative contacts child's until the child's whereabouts are known.

- School has been unable to make contact with parents/carers we will make a formal referral to the Attendance and Welfare Team.
- The School will ensure the appropriate local authority CME form is complete in all cases when as child is missing, about to be removed from the School register. All efforts will be made to confirm new address, contact details and school placement whether in UK or abroad.
- In all applicable cases, the Local Authority will be notified when the condition for deletion is met, but not before the child is deleted from the admission register. This enables the Local Authority to follow up on any concerns that may exist around the child's welfare.
- Notification to London Borough of Tower Hamlets of Child taken off School Admissions and Attendance Registers

**Governors are kept informed of pupil's attendance, pupil admissions and leavers termly.**

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](mailto: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.

## 26. 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 LBTH Policy this meeting must 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 SEND children.

## 27. 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 beyond the family home. 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.

## 28. 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 or carer 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.

**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 or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.

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

## 29. 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.

As a Rights Respecting School, children at Halley Primary School are able to articulate their views openly and through a number of established systems.

- A clear PHSE policy including Relationships and Sex Education curriculum.
- A network of pastoral support with trained Mental Health First Aiders across school.
- Access for children to an onsite Play Therapist with opportunity for children to self-refer.
- An embedded process of using circle time from Nursery to Year 6 so that children can articulate ideas and feelings.
- Clear systems of reporting any concern or disclosures made by children through CPOMS.
- **Each class has a WWW (Worries, Wonders, What if...?) boxes in their classroom to report any concern.**
- A positive behaviour policy with a focus on rewarding achievement and personal development.



## **PART THREE - SAFEGUARDING ISSUES**

### **30. 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.

At Halley a broad, age appropriate curriculum is in place to support children to develop and recognise the difference in relationships, understanding on how to develop positive and healthy relationships and to develop an understanding on the coercive nature to relationships. The school follows the JIGSAW scheme of work for PHSE and Christopher Winters for RSE, as well as holding annual events through the NSPCC PANTs on personal safety.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

For further information staff can read the [Home Office Statutory Guidance](#) on Child Sexual Exploitation as well as speaking to the DSL.

### 31. 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 at Halley Primary School are not permitted to keep a mobile phone in their possession during the school day and will be asked to hand this into the school office.**
- 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:

- absent/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

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

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](#).

[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]

## 32. 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.

## 33. ONLINE HARMS

Children should have the right to explore the digital environment but also the right to be safe when on it. However, 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 **such as cyberbullying and nudes and semi-nudes**.

In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse **other children** online, this 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, 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 report concerns to the Anti-Phishing Working Group (<https://apwg.org/>).

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](http://cyberchoices.uk)). It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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.

The School has a robust filtering system in place, both at a school and service provider level. The school uses the London Grid for Learning. This has several layers of filtering:

- There is a global list of filtered sites that is determined by the Internet Watch Foundation, followed by a pan-London layer, also in compliance with the Internet Watch Foundation, applied across the capital by Atomwide.
- There is a Local Authority layer (administered in Tower Hamlets by Nic Teeman ([nic.teeman@towerhamlets.gov.uk](mailto:nic.teeman@towerhamlets.gov.uk)) where additional bespoke filtering for the borough can be applied, such as key words and URLs.
- There is a School layer. This gives the school the ability to request that specific URLs should be blocked (or unblocked), or to add key words to the proscribed list.

The School has the right to amend its filtering settings. ICT Consultant and ICT technician have the necessary access rights, and they also receive training from LGFL and Atomwide. The School chooses to share its access rights with the Turn it On Consultancy / LA and seeks appropriate support in applying bespoke filtering policies.

The LGFL website has documents to explain these policies and processes in detail under the Support tab on their website [www.lgfl.net](http://www.lgfl.net). Pupils are required to log in using individual USOs (Unified Sign Ons) so that it is possible to track their personal online activity. Further levels of security can be added with other LGFL services such as Webscreen2 and MailProtect.

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.

The School enforces an Acceptable Use Policy, which includes provisions such as preventing access to private email on the network, ensuring web connected computers are in public areas, and monitoring browsing history. There is also, as always, a need to ensure that everyone knows what to do should they become concerned about something they find, or contact they receive, online: [teaching online safety in schools](#).

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, physical environments, as the two 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.

## 34. 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. 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 follows up with Children's Social Care where appropriate.

## 35. 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. [HM Government Multi-Agency Statutory Guidance on FGM](#) (Updated 30<sup>th</sup> 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.

### [FGM Fact Sheet](#)

## 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 can play an important role in safeguarding children from forced marriage.

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk).

Forced Marriage Unit's Statutory Guidance and Multi Agency Guidelines [The Right to Choose](#) [Updated June 2022]

### [Force Marriage Unit Statutory Guidance and Multi-Agency Guidelines](#)

## 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).

## 36. 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).

The School has a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

As of 1 July 2015, all schools have a legal duty to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent duty. Further advice on schools' duties is available here: [The Prevent Duty June 2015](#)

Since 2012, it has been required by law that teachers should not "undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs."

We will assess the risk of children in our School being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of

normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

[Prevent Duty Guidance](#) (Paragraphs 57-76 pertain to schools. There is specific statutory guidance for further education colleges)

**In our School, there are five key values help us to deter violent extremism.**

**We aim:**

1. To understand how an extremist narrative, which can lead to harm, can be challenged by staff in schools; and to model to pupils how diverse views can be heard, analysed and challenged in a way which values freedom of speech and freedom from harm;
2. To understand how to prevent harm to pupils by individuals, groups or others who promote violent extremism; and to understand how to manage risks within the school;
3. To understanding how to support individuals who are vulnerable, through strategies to support, challenge and protect;
4. To increase the resilience of pupils and of the school community by helping pupils to acquire skills and knowledge to challenge extremist views, and by promoting an ethos and values that promote respect for others;
5. To use teaching styles and curriculum opportunities which allow grievances to be aired, explored and which demonstrate the roles of conflict resolution and active citizenship.

Exposing children to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or participate in an act of violence. The processes by which young people can be radicalised are often comparable to grooming for sexual exploitation.

Staff should **always** take action if they are worried.

In LBTH the Prevent Education Officer is Iona Karrman-Bailey  
[Iona.Karrman-Bailey@towerhamlets.gov.uk](mailto:Iona.Karrman-Bailey@towerhamlets.gov.uk).

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



## 37. 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 attention 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 peer on peer 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.

The School recognises that children are capable of abusing other children. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Staff must base their decision on whether behaviour directed at another child should be categorised as harmful or not on the circumstances of each case. It will be helpful to consider the following factors:

- The relative chronological and developmental age of the two children (the greater the difference, the more likely the behaviour should be defined as abusive);
- Whether the alleged abuser is supported or joined by other children;
- A differential in power or authority (e.g. related to race, gender, physical, emotional or intellectual vulnerability of the victim);
- The actual behaviour (both physical and verbal factors must be considered);
- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation;
- The degree of physical aggression, intimidation or bribery;
- The victim's experience of the behaviour and the impact it is having on their routines and lifestyle;
- Attempts to ensure secrecy;
- Duration and frequency of behaviour.

Most cases of children hurting other children will be dealt with under the School's behavior for Learning policy, the child protection and safeguarding policy will only apply to any allegations that raise safeguarding concerns. This might include where the alleged behavior All professionals should make a referral to LA children's social care in line with Referral and Assessment Procedure when there is a suspicion or an allegation of a child:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)

If a pupil makes an allegation of abuse against another pupil:

- Staff will record the allegation and tell the DSL, but will not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

The School will seek to identify the most appropriate pathway for dealing with alleged sexualised behaviour, including:

- Managing the matter internally;
- Providing early help;
- Referring the matter to Social Care;
- Referring the matter to the Police

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent

- Ensuring pupils know they can talk to staff confidentially that staff at Halley are seen as trusted adults.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

### 38. 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 a '**it could happen here**' approach in regard to child on child sexual violence or sexual harassment and understand that children may be experiencing such forms of peer on peer 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, co-ercion 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.

School takes seriously its 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.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.

### **Responding to reports of sexual violence and sexual harassment**

When a report of peer on peer sexual violence and/or sexual harassment are brought to the attention of the DSL in accordance with KCSIE 2021 Part 5; relating to 'Immediate Response, Risk Assessment and Ongoing Response and Support for the Victim and Perpetrator the school will ensure:

That at least two members of staff are present when speaking with either victim or perpetrator (where possible)

That next steps will be discussed and shared

- Staff will only share the report with those who are necessary in order progress the disclosure
- It is important that the person to whom the child discloses recognises that they are placed in a position of trust by the child
- The need to supportive and respectful of the child; recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- Staff should keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation; listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how

the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.

- It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- Considering the best way to make a record of the report; best practice is to wait until the end of the report and immediately write up a thorough summary. **It is essential a written record is made;**
- It may be appropriate to make notes during the report (especially if a second member of staff is present).
- Only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children’s social care and/or part of a criminal investigation

If staff have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told.

**Risk assessment** When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their pupils and put adequate measures in place to protect them and keep them safe. The designated safeguarding lead (or a deputy) should ensure they are engaging with children’s social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of ‘it could happen here.’ Schools will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school. The designated safeguarding lead (or deputy) is likely to have a

complete safeguarding picture and be the most appropriate person to advise on the school's initial response. The school will take immediate response when reports of peer on peer sexual violence and sexual harassment are brought to the attention of the DSL, making sure it is in accordance with Keeping Children Safe in Education 2021 Part 5. The initial action will be to contact the CPAL advice line and then take action accordingly.

### 39. 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 young people 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 disclosures of Youth Produced Sexual Imagery, **staff must be aware that it is illegal for staff to view or share such imagery**. Staff should immediately report the disclosure to the Designated Safeguarding Lead. In accordance with UKCIS's non-statutory guidance, [Sharing Nudes and Semi-Nudes. Advice for Education Settings working with Children and Young People 2020](#), staff should:

- **Never** view, copy, print, share, store or save the imagery, or ask a child to share or download – **this is illegal**.

- If they have already viewed imagery by accident (e.g. if a young person has shown it before you can ask them not to,) report this to DSL (or equivalent) and seek support.
- **DO NOT** delete imagery or ask the young person to delete it.
- **DO NOT** ask the child/ren or young person(s) who are involved in the incident to disclose information regarding the imagery. This is responsibility of the DSL (or equivalent)
- **DO NOT** share information about the incident with other members of staff, the young person(s) it involves or their or other, parents and/or carers.
- **DO NOT** say or do anything to blame or shame any young people involved.
- **DO** explain to them that you need to report it and reassure them that they will receive support and help from DSL (or equivalent).

#### 40. 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/Peer on Peer Abuse Policy. [in accordance with Keeping Children Safe in Education 2023 and Behaviour in Schools. Advice for Head teacher and School Staff \(September 2022\).](#)

The School Anti-Bullying Policy can be found on the school website.

#### 41. 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](mailto:Host@towerhamlets.gov.uk)

## 42. 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 separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers

## 43. 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.

## 44. 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](#).

## 45. 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. School recognises that young carers have the right to an assessment by the Local Authority to identify needs and support and the person they are caring for can have a reassessment of their needs.

The DSL will follow the LBTH guidance for schools, 'Young Carers in School: A guide for education practitioners to identify and support young carers in schools' (January 2023) and refer to the Young Carers program accordingly: [Young.Carers@towerhamlets.gov.uk](mailto:Young.Carers@towerhamlets.gov.uk)

## 46. 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.




## 47. 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.

Review Date: September 2023

Headteacher signature: 

Chair of Governors signature

Shared with staff: September 2023

Next Review Date: September 2024