Learning Together for Life

Jesus said, 'Love one another as I have loved you' John 15:12, New Testament

Stepney Greencoat

Church of England Primary School

Child Protection and Safeguarding Policy

2026-2027

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This policy follows the model Child Protection policy developed by the London Borough of Tower Hamlets.

INTRODUCTION

At Stepney Greencoat, the health, safety and well-being of every child is our highest priority. We expect all staff, governors and volunteers to share this commitment to safeguarding our pupils.

We listen to our pupils and take seriously what they tell us. All school staff are trained in Child Protection, and children are made aware of the adults they can talk to if they have any concerns. Staff are trained to look out for signs of physical/emotional harm or neglect and are required to report these to the Designated Safeguarding Leads (DSL).

We follow the procedures set out by the Tower Hamlets Local Authority Safeguarding Team and our school has adopted a Child Protection policy in line with this, for the safety of all.

Procedures within the Child Protection and Safeguarding Policy apply to all staff, volunteers and governors and they have been written in accordance with Keeping Children Safe in Education 2026 and reflect local safeguarding arrangements including the Tower Hamlets Safeguarding Children Partnership supplementary guidance documents (THSCP) on Child Protection Procedures and the Management of Allegations and Concerns that do not meet the Harm Threshold.

Our Child Protection and Safeguarding policy is available on the school website, the staff shared drive, in the staff room and the school office. It is shared with all staff in September and then given to new staff during their induction period. This policy will be reviewed at least annually unless an incident, new legislation or updated guidance calls for the need for a review sooner than this.

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

- These 6 core principles are embedded within the school's safeguarding arrangements; underpin the school's safeguarding policies, procedures and systems; and pervade the whole school approach to safeguarding at Stepney Greencoat.

2. PURPOSE OF POLICY

- To ensure all pupils on the school roll are effectively safeguarded including those pupils in Alternative Provision placements.
- To provide all staff with key information to enable them to identify safeguarding concerns and know what action to take in response.
- To ensure consistent good practice throughout the school.
- To demonstrate the school's commitment to safeguarding to the whole school community: pupils, parents/carers and other partners.

3. SAFEGUARDING LEGISLATION AND GUIDANCE

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

Legislation

- Section 175 of the Education Act 2002
- The Apprenticeships, Skills, Children and Learning Act 2009
- Education and Training (Welfare of Children) Act 2021
- Human Rights Act 1998
- The Equality Act 2010
- Data protection legislation including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025
- The Safeguarding Vulnerable Groups Act 2006

Guidance

- Working Together to Safeguard Children 2023 (HM Government December 2023, Updated 18th March 2026)
- Keeping Children Safe in Education 2026 (Department for Education, 1st September 2026)
- Information Sharing: advice for practitioners providing safeguarding services (Department for Education, 2015, Updated May 2024)
- What to do if you're worried a child is being abused 2015 (Department for Education, March 2015)
- Early Years Foundation Stage Statutory Framework for group and school-based providers (July 2025)
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (Updated 28th June 2018)
- The Teacher Standards 2012 (Updated 13th December 2021)

4. PAN LONDON & TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP GUIDANCE

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

- London Child Protection Procedures revised 8th Edition (London Safeguarding Children Board, 30th March 2026)

- Tower Hamlets Safeguarding Children Partnership Levels of Need Guidance (September 2023)

- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Child Protection Procedures - September 2026

- Tower Hamlets SCP LADO Procedures and Flowchart re Allegations made against staff working in the children's workforce - Information about reporting and managing allegations

- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Managing Allegations of Abuse against Staff and Concerns that do not meet the harm threshold – September 2026

- Tower Hamlets SCP Multi-Agency Escalation and Resolution Policy

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: www.thscp.org.uk

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

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

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

6. LOCAL AUTHORITY STRATEGY

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

- TH: Is Accelerate: The Tower Hamlets Children and Families Partnership Strategy 2024-2029
- Tower Hamlets Special Educational Needs, Disabilities and Inclusion Strategy 2024-2029
- Tower Hamlets Early Help Strategy 2025-28: Going further to make support easy to access for all families
- VAWG and Women's Safety Strategy 2024-2029
- Tower Hamlets Serious Violence and Exploitation Strategy

7. KEY DEFINITIONS

Safeguarding and promoting the welfare of children is:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of a child's physical and mental health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

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

Child includes everyone under the age of 18.

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

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

8. ROLES AND RESPONSIBILITIES

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

In accordance with the statutory requirement for a named member of the Federation Board to take leadership responsibility for safeguarding at the school.

The Head teacher is responsible for ensuring that the school's Child Protection and Safeguarding 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.

Our Designated Safeguarding Team

Designated Safeguarding Lead (DSL):
Tom Jakobsson, Head of school

Strategic Safeguarding Lead:
Elizabeth Figueiredo, Executive Headteacher

Deputy Designated Safeguarding Leads (DDSL):
Charlotte Young, Inclusion Lead / Natalie Bailey-Green, Assistant SENCo

Designated Safeguarding Governor:
Angela Hancock

Designated Online Safety Governor:
Angela Hancock

Designated Teacher for Looked After Children:
Tom Jakobsson, Head of School

If you have a safeguarding concern about a child, you must speak to a Designated Safeguarding lead and follow the expectations and procedures set out in this Child Protection and Safeguarding Policy.

Out of school hours and outside of term time, any concerns should be directed to the Child Protection Advice Line: 020 7364 3444.

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

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

All staff should recognise that as frontline workers they are in a vitally 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. All concerns should be logged on CPOMS, regardless of how incidental they may seem ensuring that the DSL team are all alerted to the incident. When logging a safeguarding concern, staff can also alert the DSL in person. If in doubt about any safeguarding matter, staff should always speak to the DSL.

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

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

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

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

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

The school has robust arrangements to ensure safeguarding leadership is available during school hours and during out-of-hours activities. Appropriate systems are in place to enable safeguarding concerns to be received, monitored and responded to during periods when the DSL is unavailable.

9. RIGHTS OF THE CHILD

The school upholds the Human Rights of the child in accordance with the Human Rights Act 1998.[2] It is unlawful for schools to act in a way that is incompatible with the European Convention on Human Rights. Specifically, the school embeds and upholds the following Convention rights of the child across its safeguarding policies and procedures:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination
- Protocol 1, Article 2: protects the right to education.

In accordance with the Equality Act 2010, the school must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Our school's Equality Policy provides further details on our commitment to the Equality Act. 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

[2] https://www.equalityhumanrights.com/en/human-rights

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.

At Stepney Greencoat, we address the issue of Human Rights and Equality through our whole school collective worship program, our PSHCE curriculum and continued work regarding our school values.

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

The school shares the London Borough of Tower Hamlet's commitment to being an anti-racist borough and to tackle and eliminate race discrimination. The council's Black, Asian, and Minority Ethnic Inequalities Commission (2021) concluded that racism still exists within institutions and structures in the borough and has developed an action plan to achieve race equality at pace.[4] The action plan recognises that schools have a powerful and significant role in changing narratives and bringing about social change through education. The school along with other safeguarding partners is fully committed to implementing the Tower Hamlets Safeguarding Children Partnership's Anti-Racist Charter (2025) across its safeguarding practice.

10. 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 pregnant and/or is a parent themselves;
- has exhibited early signs of abusive, violent and/or harmful behaviours;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;

[3] https://chscp.org.uk/wp-content/uploads/2022/03/Child-Q-PUBLISHED-14-March-22.pdf
[4] https://www.towerhamlets.gov.uk/lgnl/community_and_living/Inequality-Commission/Black-Asian-and-Minority-Ethnic-Inequalities-Commission.aspx

- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves;
- has returned home to their family from care; and
- is at risk of so-called honour-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day.

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

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

All staff must be aware of children known to a Social Worker, remain professionally curious, and report any welfare concerns immediately to the DSL. Staff should provide appropriate support, follow safeguarding procedures, and work with relevant agencies to help safeguard and promote the child's welfare.

12. 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 or other adverse experiences.

Staff should be aware of the impact that trauma, bereavement, family adversity, domestic abuse, bullying, discrimination and other safeguarding concerns can have on a child’s emotional wellbeing and mental health

Staff should recognise that safeguarding concerns and mental health difficulties can often overlap and interact. Children experiencing mental health difficulties may be more vulnerable to safeguarding risks, whilst children who have experienced abuse, neglect, exploitation or trauma may present with emotional, behavioural or mental health needs. Early identification and appropriate support can help prevent concerns from escalating and promote positive outcomes for children.

Whilst all staff should be alert to behaviour, presentation and emotional responses that may indicate a child is experiencing difficulties with their mental health or wellbeing, only appropriately trained professionals should attempt to make a diagnosis of a mental health condition. Concerns about a child's mental health should be discussed with the Designated Safeguarding Lead and considered alongside any other safeguarding information known about the child.

The school is committed to promoting positive mental health and emotional wellbeing through a whole-school approach. Appropriate support will be provided at the earliest opportunity, and where necessary the school will work in partnership with parents/carers and relevant agencies to ensure that support is coordinated and proportionate to the child's needs.

Where we have concerns about the mental health of pupils in our school we, after speaking with the child and with the parents, either together, separately or both, would make a referral to CAMHS for further advice and support for the child and family. We would also follow our usual safeguarding procedures in logging concerns and seeking support from Social Care as needed. Our SENCO is the Mental Health Lead. The school works closely with Tower Hamlets Educational Wellbeing service and has an allocated practitioner supporting families in school.

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

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

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

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

The Head of School is also the Designated Teacher for Looked After Children and Previous Looked After Children. The head teacher works closely with the Tower Hamlets Virtual School Head teacher and staff to ensure that pupils are supported emotionally and academically and are effectively safeguarded. Guidance suggests that the virtual school head teacher also has a responsibility to promote the educational achievement of all children in kinship care.

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

The school will work with the Tower Hamlets Virtual School to promote and champion the attendance, attainment and progress of children in kinship care arrangements. Since September

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

14. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

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

- professionals and other adults making assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- the potential for children with SEN and disabilities or certain medical conditions being vulnerable to experiencing peer exclusion and isolation and being disproportionally 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.
- the need for intimate care or that these children are isolated from others and that these children are more likely to be dependent on adults for care, and
- children with SEN and disabilities may have issues understanding the impact of their behaviour or the consequences they receive. They may be unable to understand the difference between fact and fiction in online content and then repeat the content/behaviours in school or college.

For some disabled children, their dependency on parents and carers for practical assistance in daily living, including intimate personal care, may increase their risk of exposure to abusive behaviour. Some children may also have an impaired capacity to resist or avoid abuse. Looked After Disabled Children may be particularly susceptible to possible abuse because of their additional dependency on residential and hospital staff for day-to-day physical care needs.

Further information on safeguarding SEND children is available in the non-statutory guidance Safeguarding Disabled Children (2009); NSPCC Safeguarding Children with Special Educational Needs and Disabilities (May 2022), and NSPCC Safeguarding Deaf Children and Children who have disabilities at greater risk of abuse (September 2025). Staff should speak with the DSL and SENDCO in the first instance.

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

To help safeguard these pupils, the school ensures that safeguarding systems are accessible to all children through appropriate communication methods, reasonable adjustments, and tailored support. Staff work closely with the SENDCo, Designated Safeguarding Lead (DSL), parents/carers, and external agencies where appropriate to ensure pupils' individual needs are understood and met.

All staff must remain professionally curious and vigilant when working with pupils with SEND. Staff should not assume that changes in behaviour, communication, attendance, presentation, or emotional wellbeing are solely related to a child's additional needs or disability. Any safeguarding concerns, however small, must be recorded and reported immediately to the DSL in accordance with the school's safeguarding procedures. Staff should take time to listen to pupils, use communication strategies appropriate to their needs, and ensure that any barriers to disclosure are identified and reduced so that all children are able to seek help and have their voices heard.

CHILDREN WITH MEDICAL CONDITION

Children with medical conditions may face additional safeguarding vulnerabilities, particularly where their condition affects communication, independence, emotional wellbeing or attendance. Staff should be mindful that safeguarding concerns may present differently and should work alongside health professionals and parents to support these children.

Children with medical conditions may be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school or where they are repeatedly sent without essential medication, thereby putting the individual at risk. In these cases, the school will take appropriate action and make referrals to the Children Social Care.

15. CHILDREN ABSENT FROM EDUCATION & CHILDREN MISSING EDUCATION

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

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

The school's Attendance Policy provides further details on the procedures following absence and issues with attendance.

When a pupil does not return to school and the whereabouts of the child and their family are not known, the school will make reasonable enquiries and refer the child to the Attendance & Welfare

Advisor to support with those enquiries to ascertain the child's whereabouts, and only after these steps have been taken refer to the Local Authority using a Missing Children referral form.

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

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

16. ELECTIVE HOME EDUCATION

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

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

17. 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.

For further details of the whistleblowing procedures, please refer to the school Whistleblowing Policy.

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

18. REPORTING OF ALLEGATIONS AGAINST STAFF & CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

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, trainee teachers and volunteers, the school's Managing Allegations Procedures should be followed, and all action taken needs to be in line with KCSIE 2026 Part 4 and the THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – September 2025.

An allegation is made against a member of staff including supply staff, volunteers, contractors and governors, when an individual has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

All staff must report all allegations, irrespective of the source, directly to the 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 headteacher will make immediate contact with the Local Authority Designated Officer for an initial discussion. If the allegation concerns the headteacher, then the Chair of Governors shall contact the LADO.

When an allegation is made against a supply member of staff, the headteacher 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 or LADO@towerhamlets.gov.uk

Telephone: 0207364 0677

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

Concerns about staff that do not initially seem to fulfil the allegation criteria set out above are known as Concerns that do not meet the Harm Threshold, sometimes called low-level concerns, not because they are insignificant but because they do not initially seem to meet the harm threshold. Staff should report and self-report such concerns in accordance with the school's procedures, which

are found in the school's Staff Code of Conduct. Contact will be made with the LADO for advice and guidance when appropriate as part of the Headteacher's or Chair of Governor's response to the report.

The school's Staff Code of Conduct is included in our suite of policies shared annually as part of our Safeguarding INSET. Our Staff Code of Conduct Policy can be found on our school website, in our staff room and can be acquired from the school office.

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.

19. STAFF SAFEGUARDING TRAINING INCLUDING TRAINING FOR GOVERNORS

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

Safeguarding training is a vital part of our September INSET for all staff annually. At this time, all staff receive copies of our safeguarding polices including the Child Protection and Safeguarding policy and Keeping Children Safe in Education, and are informed of any updates made. All staff sign a policy receipt to confirm that they have received copies and that they commit to reading and complying with the documentation. Where staff are absent for this training, or join the school at other times in the academic year, they will receive safeguarding training, and the relevant documents on their return or as part of their induction. Regular safeguarding updates are also given at daily staff briefing meetings.

The safeguarding team monitor the number of concerns logged by individual staff on CPOMS and the quality of these referrals. Where further support is needed for individual staff in relation to safeguarding referrals, this is done by the DSL or the Deputy DSL.

In addition to School Staff, Governors 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 as part of continuous professional development should include Online Safety. Further information on this can be found within our school's ICT and Security Policy.

Through regular safeguarding training and updates, staff are given the relevant skills and knowledge to safeguard children effectively and governors will be empowered and equipped

to provide strategic challenge and gain assurance that effective safeguarding arrangements in place.

20. VISITORS

All visitors to the school must sign in at the school office. If the visitor will have contact with children, a copy of their ID and DBS is taken, checked and entered on the Single Central Record. Visitors without an up to date DBS will not be allowed onto the premises unaccompanied. Further information can be found in our Visitor's Policy.

When a Social Worker, Police Officer or another professional visits the school to meet with a child as part of statutory investigations or other work, the ultimate safeguarding responsibility remains with the school. Visitors may include professionals, contractors, guest speakers, performers, family members and community organisations. The school will undertake appropriate checks, and supervision arrangements proportionate to the purpose of the visit.

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.

21. VOLUNTEERS

From September 2026, volunteers undertaking teaching, training, instruction or supervision of children frequently, on more than three days in a thirty-day period, or overnight, are engaged in regulated activity and will require appropriate DBS checks, including children's barred list information where required.
Volunteers who are not undertaking regulated activity will be subject to a written risk assessment to determine the level of safeguarding checks required.

22. ALTERNATIVE PROVISION PROVIDERS

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

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

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

changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

23. EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

All extended and off-site activities are subject to a risk assessment, approved by senior leadership, and take into account the school's Child Protection and Safeguarding Policy and procedures. When pupils attend off-site activities, including day and residential visits and work-related activities, the school ensures that Risk Assessments are completed by the lead adult and that they take into consideration information from the venue. School staff will always attend these events with children and have responsibility to ensure that safeguarding arrangements as outlined in this policy are maintained.

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

24. IDENTIFYING ABUSE

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

The school is aware that children can be at risk of abuse, harm and exploitation outside of the family home. Such extra familial harms include sexual exploitation, criminal exploitation, serious youth violence, and abuse that occurs on digital and online platforms. All staff especially the DSL and Deputy DSLs must consider whether children are at risk of harm and exploitation in environments outside the family home. All staff should therefore apply a Contextual Safeguarding approach when safeguarding pupils, which includes applying a Contextual Safeguarding approach in the school context.

25. INDICATORS OF ABUSE

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

Sexual - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) 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 failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.

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

26. 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.

At Stepney Greencoat, we encourage and support children to speak up through our PSHE curriculum, collective worship program and ongoing pastoral work. We continually encourage children to voice any concerns they may have to a trusted adult.

The school also provides age-appropriate opportunities for children to share concerns through pastoral support, wellbeing check-ins, worry boxes, and other appropriate communication methods where required. Staff ensure that reasonable adjustments are made for pupils who may need alternative ways to communicate, including those with SEND or additional communication needs.

All staff have a responsibility to listen carefully to children, take their concerns seriously, reassure them that they have been heard, and report any safeguarding concerns immediately to the Designated Safeguarding Lead in accordance with the school's safeguarding procedures.

27. SAFEGUARDING ISSUES

28. 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 and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery - https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims/modern-slavery-statutory-guidance-for-england-and-wales-under-s49-of-the-modern-slavery-act-2015-and-non-statutory-guidance-for-scotland-and-northe. Where a child is identified as a potential victim of CSE or CSE, a child protection and modern slavery referral will be made.

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 physical and non-physical contacts including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, 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.
This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. 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.

We follow the Jig-Saw scheme of work for PSHE to support children's understanding of safeguarding related issues as well as a whole school Relationships and Sex Education curriculum that is regularly reviewed.

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

29. CHILD CRIMINAL EXPLOITATION INCLUDING COUNTY LINES

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

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

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

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

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

- Children who are in possession of multiple phones and overly anxious to check their phones

- Children who experience sudden changes in behaviour e.g. looking agitated, children who want to leave the school premises at lunchtime
- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

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

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

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

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

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

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

30. 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 disrupted education (e.g. suspensions, permanent

exclusions, time in alternative provision) or a history of offending, 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. Children involved may be both victims and perpetrators of harm. School staff will consider whether involvement in serious violence forms part of a wider safeguarding concern.

31. ONLINE HARMS

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

In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, which can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In accordance with Behaviour in Schools. Advice for headteachers and school staff (September 2022), the school promotes as part of its culture of excellent standards of behaviour that the same standards of behaviour are expected online as apply offline, and that every pupil should be treated with kindness, respect and dignity.

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

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

- Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racism, prejudice-based content, misogyny, misinformation, disinformation, conspiracies, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- Contact: being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention of grooming or exploiting them for sexual, criminal; financial or other purposes;
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (e.g. consensual or non-consensual sharing of nudes and semi-nudes), and/or pornography, sharing other explicit images and online bullying.

- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. When pupils are at risk of phishing, school can reports concerns to the Anti-Phishing Working Group (https://apwg.org/).

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

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

When there are concerns about a child in this area, staff should notify the DSL, who will consider referring the child into the Cyber Choices programme (cyberchoices.uk), which provides early intervention where children are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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

- identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- The effectiveness of filtering and monitoring systems will be formally reviewed at least annually by the senior leader responsible for filtering and monitoring, working alongside the DSL and IT support provider. Records of these reviews and checks will be maintained.
- 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 appropriate filtering and monitoring systems in place to safeguard pupils when accessing the internet on school devices and the school network. Internet filtering and web monitoring are provided through LGFL, while Senso is used to monitor device activity and provide alerts where safeguarding concerns may be identified, including through keystroke monitoring and online activity.

Filtering systems are designed to block access to inappropriate and harmful content while allowing access to educational resources. Monitoring systems help identify potential safeguarding concerns, including indicators of abuse, exploitation, self-harm, bullying, radicalisation, or other online risks. Monitoring alerts are reviewed promptly by designated members of staff, with safeguarding concerns referred immediately to the Designated Safeguarding Lead (DSL) where appropriate.

The school regularly reviews the effectiveness of its filtering and monitoring arrangements to ensure they remain appropriate for the age and needs of pupils, are proportionate, and continue to meet the Department for Education's Digital and Technology Standards. Reviews are undertaken by the safeguarding and leadership teams, with support from the school's IT provider where necessary. The governing body receives appropriate assurance that filtering and monitoring systems are effective and operating as intended.

Where remote learning is provided, the school takes appropriate steps to ensure it is safe for both pupils and staff. Remote learning takes place using school-approved platforms and systems. Staff communicate with pupils only through authorised school communication channels using

professional standards at all times. Appropriate safeguarding, behaviour, attendance and online safety expectations apply during remote learning in the same way as they do within school. Any safeguarding concerns arising during remote learning are reported immediately to the Designated Safeguarding Lead and managed in accordance with the school's safeguarding procedures. Pupils and parents are reminded regularly about safe online behaviour, appropriate use of technology, and how to report any concerns encountered whilst learning remotely.

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.

Further information about the school's approach to online safety can be found in the Online Safety Policy, Pupil Behaviour Policy, and the Acceptable Use Policies for staff and pupils, all of which should be read alongside this Child Protection and Safeguarding Policy.

In accordance with Department for Education's guidance, Mobile Phones in Schools (February 2026), the school prohibits the use of mobile/smart phones throughout the school day as set out in the Behaviour Policy. The school's Mobile Phone Policy forms part of the wider safeguarding framework and sets out expectations relating to pupils, staff and visitors concerning the safe and appropriate use of mobile devices.

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

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

32. DOMESTIC ABUSE

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

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

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

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

33. 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.

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

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

Forced Marriage

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

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

Virginity Testing and Hymenoplasty

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

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

In response to any reports of a child/young person being subject to or at risk of virginity testing or hymenoplasty, the DSL will take action in accordance with the government's non-statutory guidance Virginity testing and hymenoplasty: multi-agency guidance (August 2025).

34. 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).

As a school we follow the Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism. This includes completing and reviewing the Prevent Risk Assessment and Prevent Checklists as part of the Prevent Duty.

Prevent training is part of our ongoing cycle of safeguarding training for staff and is also addressed in briefing meetings as needed.

Our curriculum is designed to meet the needs of our children and reflects the diverse nature of our school community, living in the heart of London, in terms of ethnicity, religion and culture and allows regular opportunities for children to learn from and about the views of others which may be different to their own.

The school promotes fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) through Collective Worship, PSHCE and the wider curriculum.

LBTH Prevent contact
Tom Llewellyn-Jones - Tom.Llewellyn-jones@towerhamlets.gov.uk
Prevent, Hate Crime and Protective Security Programme Manager

In LBTH all Prevent related concerns should be referred through completing a National Referral Form (NRF) and sent to the Multi Agency Support Team and **Prevent.referrals@towerhamlets.gov.uk**

35. CHILD-ON-CHILD ABUSE (INCLUDING HARASSMENT AND VIOLENCE)

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

Child-on-child abuse is a safeguarding issue for both the child who has experienced harm and the child displaying the behaviour. It is preventable and may involve serious physical violence, threats, intimidation or the use of weapons.

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, or otherwise causing physical harm,
- physical assault and harm, or the threat of harm with a weapon,
- harmful sexual behaviour, sexual violence and sexual harassment including misogyny/misandry,
- 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 making or sharing of nudes and semi-nudes images and/or videos including those generated using AI,
- 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 or cause the victim humiliation, distress, or alarm. 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. This includes behaviours driven by misogyny, misandry and other forms of prejudice, discrimination or hostility

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

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

The school recognises that some children may not identify with the terms 'victim' or 'perpetrator'; therefore, careful consideration will be given to the language used when discussing incidents and support arrangements with children and their families.

Child-on-child abuse is taken seriously by the school and a range of actions are taken both to stop this and to support all involved parties in understanding why the actions are wrong and to prevent such incidents happening in the future.

Actions include, observations, individual and joint meetings, meetings with parents, therapeutic activities, agreements put in place, whole staff awareness, referrals to outside agencies, including social care if appropriate

At our school, we seek to minimise the risk of child-on-child abuse through the implementation of our curriculum and associated policies:

- Our Anti-bullying policy acknowledges the process and procedures followed by staff.
- Our Relationships and Sex Education Policy and Jigsaw scheme of work prepares the children for age appropriate relationships and physical contact.

Our school values are fundamental in our work to develop children who are respectful of one another and who take responsibility for their impact upon others.
We are clear however that abuse is abuse, it could happen here, and if it does, it will not be tolerated. As staff we must remain objective to the facts and we must avoid passing incidences off as 'banter' or 'part of growing up'. Part of our duty for safeguarding is also teaching the children appropriate behaviours/language to avoid safeguarding matters escalating for them.
If staff are concerned about potential child-on-child abuse, they must report it to the Designated Safeguarding leads and record incidents and concerns on CPOMs to be reviewed by senior leadership.
In partnership with the child and their family, the Designated Safeguarding leads will decide what further action to take which may include, but is not limited to, the following:

- Discussions with alleged victim and perpetrator to understand the extent of the harm;
- Discussions with the alleged victim and perpetrators parents regarding the extent of the harm and a support plan to respond;
- The use of restorative practices to enable children to fully learn about and understand the extent of the harm that has been committed and to empower them to take responsibility for their actions;
- A support plan may include a referral to the school's pastoral team
- Discussions with the Early Help Hub may be sought to determine what support could be sought by both the alleged victim and perpetrator. This is likely to be appropriate if the abuse may have stemmed from a lack of structured time outside of school.

36. CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

All staff must be aware that sexual violence and sexual harassment can occur between two children of any age and sex and it can happen in any environment including schools, the family home as part of intra-familial abuse and via online platforms. It can also occur when a group of children sexually assaulting or sexually harassing a single child or a group of children. The abuse may be perpetrated by a younger child towards an older child because of an imbalance of power caused by factors such as height difference or cognitive ability.

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

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

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

Staff should be aware of the importance of:

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

Sexual violence offences are defined under the Sexual Offences Act 2003

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

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

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

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

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

All Staff need to be aware of the following:

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

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

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 Social Care 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 Social Care, the Police and other specialist services.

All reports of child-on-child sexual violence or sexual harassment will be taken seriously and responded to promptly, proportionately and in accordance with Keeping Children Safe in Education (2026), Part Five. The Designated Safeguarding Lead (DSL) will ensure that a clear, accurate and contemporaneous written record is made of all concerns, disclosures, decisions, actions taken and the rationale for those decisions. Records will be stored securely in line with the school's safeguarding and data protection procedures.

The DSL will undertake a written safeguarding risk assessment for all cases where appropriate to determine how the school can protect and support the children involved while the matter is being investigated or managed. Risk assessments will be regularly reviewed and updated as circumstances change, taking account of the wishes of the victim, the nature of the incident, the level of risk, and any advice received from external agencies.

The school will adopt a child-centred approach and provide ongoing support for the victim, ensuring they feel safe, are listened to, and are able to continue accessing education wherever possible. Support will be tailored to the individual's needs and may include pastoral support, counselling, adjustments to timetables or supervision arrangements, and referrals to external services where appropriate.

The alleged perpetrator will also receive appropriate support and intervention, recognising that they may have unmet needs or be vulnerable themselves. The school will manage any identified safeguarding risks, implement appropriate behaviour and safeguarding measures, and work with parents/carers and relevant external agencies where appropriate. Disciplinary action, where necessary, will be considered separately from safeguarding support.

The DSL will regularly review the effectiveness of the support and risk management arrangements for all children involved and ensure that records are updated accordingly. The school will work closely with Children's Social Care, the police and other relevant agencies where referrals have been made, ensuring that information is shared appropriately and that the safety and welfare of all pupils remains paramount throughout the process.

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

37. YOUTH PRODUCED SEXUAL IMAGERY

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

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

Incidents may also occur where:

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

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

Nude and semi-nude images may also be digitally altered or wholly generated through artificial intelligence technologies, including so-called 'deepfake' or 'deep nude' images. Such images should be treated as safeguarding concerns and responded to in accordance with KCSIE 2026 and relevant UKCIS guidance.

When handling reports of Youth Produced Sexual Imagery, **staff must be aware that it is illegal for staff to view or share such imagery**. Staff should immediately inform the Designated Safeguarding Lead who will act in accordance with KCSIE 2026 and non-statutory guidance, Sharing Nudes and Semi-Nudes. Advice for Education Settings working with Children and Young People (Updated March 2024).

38. BULLYING (INCLUDING CYBERBULLYING)

Bullying is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the school's Anti-Bullying Policy/Pupil Behaviour Policy/Child-on-child abuse Policy, in accordance with Keeping Children Safe in Education 2026 and Behaviour in Schools. Advice for Head teacher and School Staff (September 2022).

Please refer to the school's Behaviour and Relationships policy and procedures for further details.

39. 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

40. CHILDREN AND THE COURT SYSTEM

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

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

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

41. 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.

42. 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 MAST Request for Support Form, 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.

43. 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 condition
• a mental health condition

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

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

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

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

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

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

School recognises that in accordance with the Care Act 2014 and the Children and Families Act 2014 young carers have the right to an assessment by the Local Authority to identify needs and support and the person they are caring has the right to have a reassessment of their needs.

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

44. 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.

45. 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.

Child Sexual Exploitation may be committed by an individual or organised network. Victims may identify as belonging to the group exploiting them and may not recognise themselves as victims.

Child Criminal Exploitation may constitute modern slavery. Children who have been criminally exploited may commit offences while under coercion and should be recognised primarily as victims.

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 MAST.

46. TAKING SAFEGUARDING ACTION

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

- in an emergency take the action necessary to help the child (including calling 999)
- report your concern as soon as possible to the DSL, no later than the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern using your CPOMs login ensuring you alert the DSL team. If for any reason you cannot access CPOMs the concern should be shared with a member of the DSL team in person
- seek support for yourself if you are distressed.

47. EARLY HELP

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

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

All staff need to recognise that all children may benefit from Early Help at any point in their childhood, but some children may benefit from Early Help more than others. These are children with known vulnerabilities, which are listed on page 11 of this policy.

The school recognises that support may be provided through universal services, community-based early help services and targeted Family Help arrangements. The DSL will work with relevant partners to ensure children and families receive the right support at the right time.

Where needs cannot be met through universal or community-based support alone, the DSL may work with partner agencies to access Family Help services. The school will contribute information to assessments, planning and reviews and will continue to support the child throughout any Family Help intervention.

Our school is committed to ensuring everything possible is done to prevent the unnecessary escalation of issues or problems. Children, young people and their families will be offered help when needs and/or concerns are first identified and, as a consequence of the early help offered, children's circumstances should improve and, in some cases, the need for more intrusive and intensive services are lessened or avoided.

We will work with children and families at the earliest possible point to help them by listening to their needs and developing a support plan which takes into account any access that may be required to additional resources, expertise or to consider any adjustments that can be made in school. We will also assist children and families who may need further support through the use of the "Early Help Assessment" and the organisation of a "Team Around the Family", a team which consists of members of staff from the school, parent/carer(s), the child or children (if it's appropriate) and other professionals from services who may be able to support the family.

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

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

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

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

Child Protection Advice Line
020 7364 3444

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

48. 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.

The school will follow the advice of the MAST team with regards to when to inform parents of a disclosure and what to share with them with regards to the disclosure

49. CONFIDENTIALITY AND INFORMATION SHARING

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.

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

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

Staff will have due regard to the Data protection legislation including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025
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.

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. Staff should recognise that timely and proportionate

information sharing supports effective safeguarding practice and must not be delayed through concerns about data protection legislation where there is a safeguarding need. 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.

The school will gain consent unless doing so would put the child at further risk of harm. The school would always seek advice from Social Care and or the Data Protection Officer when appropriate.

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.

50. REFERRING TO CHILDREN'S SOCIAL CARE

The DSL will make a referral to Children's Social Care applying the THSCP Levels of Need Guidance if it is believed that a pupil is suffering or is at risk of suffering significant harm, or the child is considered to be in need, that is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services.

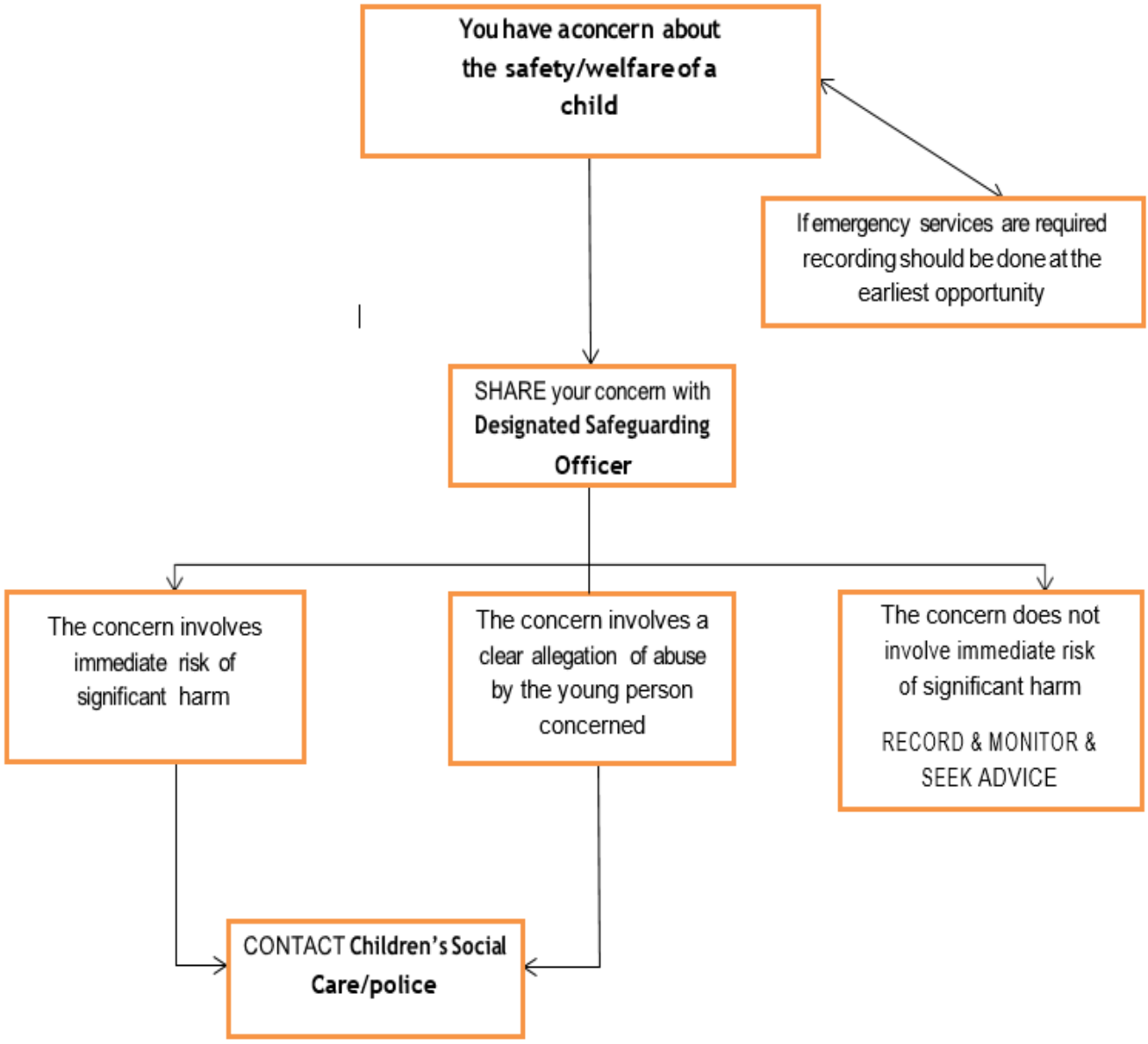
LBTH Multi-Agency Support Team:
020 7364 5006 (Option 3) 020 7364 5601/5606/5358/7796

Child Protection Advice Line:
020 7364 3444

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

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

Making a Child Protection Decision - Flow Chart

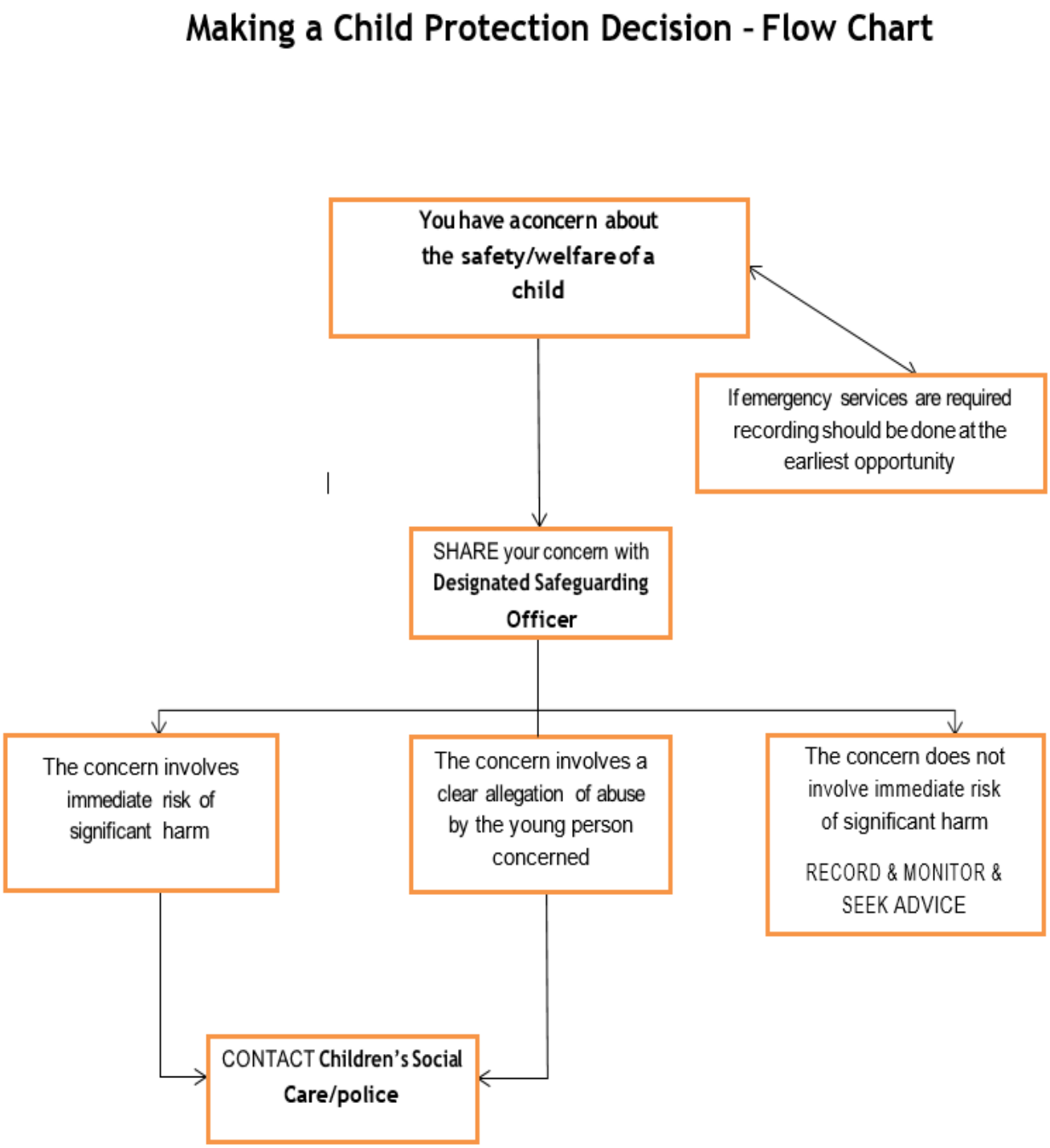


51. ESCALATION PROCEDURES

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

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

APPENDIX 1 – MAKING A CHILD PROTECTION DECISION FLOW CHART



APPENDIX 2 – GOLDEN RULES FOR INFORMATION SHARING

Eight Golden Rules for Information Sharing

1. **Remember that the Data Protection Act is not a barrier to sharing information** but provides a framework to ensure that personal information about living persons is shared appropriately.
2. **If there are concerns that a child may be at risk of significant harm or an adult at risk of serious harm**, then it is your duty to follow the relevant procedures without delay. Seek advice if you are not sure what to do at any stage and ensure that the outcome of the discussion is recorded.
3. **Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
4. **Seek advice** if you are in any doubt, without disclosing the identity of the person where possible.
5. **Share with consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You should go ahead and share information without consent if, in your judgement, that lack of consent can be overridden in the public interest, or where a child is at risk of significant harm. You will need to base your judgement on the facts of the case.
6. **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
7. **Necessary, proportionate, relevant, accurate, timely and secure**: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
8. **Keep a record** of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

APPENDIX 3 – CHILD PROTECTION KEY INFORMATION POSTER

Our Safeguarding Team

2026-2027

Designated Safeguarding Lead (DSL)	Deputy Designated Safeguarding Lead (DDSL)	Deputy Designated Safeguarding Lead (DDSL)	Deputy Designated Safeguarding Lead (DDSL)
			
Thomas Jakobsson	**Charlotte Young**	**Elizabeth Figueiredo**	**Natalie Bailey-Green**
Head of School	Inclusion Lead	Executive Headteacher	Assistant SENCo

Report all concerns using the CPOMS system:

https://stepneygreencoat.cpoms.net/login

If urgent, also alert any lead in person.

Usually, the DSL will report concerns to the appropriate authorities but all staff should be aware that ANY staff can refer on if they think this is necessary to protect a child.

ROLE	CONTACT
LBTH Multi Agency Support Team (MAST)	020 7364 5006 (Option 3) 020 7364 5601/5606
Child Protection Advice Line	020 7364 3444
NSPCC Whistleblowing Advice Line	0800 028 0285

PREVENT - If you suspect someone is engaged in terrorist activity, you should also contact the police or the anti-terrorist hotline immediately on 0800 789 321.

APPENDIX 4 – MAST Poster

Tower Hamlets Safeguarding Children Partnership

MULTI – AGENCY SUPPORT TEAM (MAST)

0207 364 3444 / 5601 / 5606 / 5358 / 7796 / 3342 / 7828 / 6469 / 3181

direct line 9.00am – 5.00pm weekdays
(excluding bank holidays)

Designated Safeguarding Lead:.....**Date**.....

APPENDIX 5: MAST Request for Support Form