



Woolmore  
Primary School

# **SAFEGUARDING AND CHILD PROTECTION POLICY**



## CONTENTS

<b>1. CORE SAFEGUARDING PRINCIPLES</b>	<b>4</b>
<b>2. PURPOSE OF POLICY</b>	<b>5</b>
<b>3. SAFEGUARDING LEGISLATION AND GUIDANCE</b>	<b>5</b>
<b>4. TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP GUIDANCE</b>	<b>6</b>
<b>5. TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP</b>	<b>7</b>
<b>6. KEY DEFINITIONS</b>	<b>7</b>
<b>7. ROLES AND RESPONSIBILITIES</b>	<b>8</b>
<b>8. RIGHTS OF THE CHILD</b>	<b>10</b>
<b>9. CHILDREN WHO MAY BE POTENTIALLY MORE AT RISK OF HARM</b>	<b>12</b>
<b>10. CHILDREN IN NEED OF A SOCIAL WORKER</b>	<b>13</b>
<b>11. CHILDREN REQUIRING MENTAL HEALTH SUPPORT</b>	<b>14</b>
<b>12. LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN</b>	<b>15</b>
<b>13. SEND CHILDREN</b>	<b>16</b>
<b>14. CHILDREN ABSENT FROM EDUCATION &amp; CHILDREN MISSING EDUCATION</b>	<b>18</b>
<b>15. ELECTIVE HOME EDUCATION</b>	<b>19</b>
<b>16. WHISTLEBLOWING</b>	<b>20</b>
<b>17. REPORTING OF ALLEGATIONS AGAINST STAFF &amp; CONCERNS THAT DO NOT MEET THE HARM THRESHOLD</b>	<b>20</b>
<b>18. STAFF SAFEGUARDING TRAINING INCLUDING TRAINING FOR GOVERNORS</b>	<b>22</b>
<b>19. VISITORS</b>	<b>23</b>
<b>20. EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS</b>	<b>24</b>
<b>21. IDENTIFYING ABUSE</b>	<b>24</b>
<b>22. INDICATORS OF ABUSE</b>	<b>25</b>
<b>23. VOICE OF THE CHILD</b>	<b>26</b>
<b>SAFEGUARDING ISSUES</b>	<b>27</b>
<b>24. CHILD SEXUAL EXPLOITATION</b>	<b>27</b>
<b>25. CHILD CRIMINAL EXPLOITATION INCLUDING COUNTY LINES</b>	<b>30</b>
<b>26. SERIOUS YOUTH VIOLENCE</b>	<b>32</b>
<b>27. ONLINE HARMS</b>	<b>32</b>
<b>28. DOMESTIC ABUSE</b>	<b>38</b>
<b>29. SO-CALLED HONOUR-BASED ABUSE</b>	<b>39</b>
<b>30. RADICALISATION AND EXTREMISM</b>	<b>41</b>

<b>31. CHILD-ON-CHILD ABUSE</b>	<b>43</b>
<b>32. CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT</b>	<b>45</b>
<b>33. YOUTH PRODUCED SEXUAL IMAGERY</b>	<b>49</b>
<b>34. BULLYING (INCLUDING CYBERBULLYING)</b>	<b>61</b>
<b>35. HOMELESSNESS</b>	<b>61</b>
<b>36. CHILDREN AND THE COURT SYSTEM</b>	<b>62</b>
<b>37. CHILDREN WITH FAMILY MEMBERS IN PRISON</b>	<b>63</b>
<b>38. PRIVATE FOSTERING</b>	<b>63</b>
<b>39. YOUNG CARERS</b>	<b>63</b>
<b>40. CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS</b>	<b>64</b>
<b>41. MODERN SLAVERY</b>	<b>64</b>
<b>42. TAKING SAFEGUARDING ACTION</b>	<b>65</b>
<b>43. EARLY HELP</b>	<b>65</b>
<b>44. HANDLING THE REPORTING OR SHARING OF CONCERNS</b>	<b>67</b>
<b>45. CONFIDENTIALITY AND SHARING INFORMATION</b>	<b>68</b>
<b>46. REFERRING TO CHILDREN'S SOCIAL CARE</b>	<b>70</b>
<b>47. ESCALATION PROCEDURES</b>	<b>71</b>

At Woolmore Primary School we believe that all pupils have a fundamental right to be protected from harm and that they cannot learn effectively unless they feel safe. We strive to build a school where pupils feel secure, their viewpoints are valued, they are encouraged to talk and adults are always expected to listen.

This policy outlines the safeguarding and child protection procedures for all staff, volunteers, visitors and governors; all the procedures have been written in accordance with Keeping Children Safe in Education 2024 and reflect local safeguarding arrangements including the Tower Hamlets Safeguarding Children Partnership Supplementary Guidance documents on Child Protection Procedures and the Management of Allegations.

This Safeguarding and Child Protection Policy is made available and accessible to staff, parents and visitors via the school website, staff induction, staff training, admissions meetings for new parents, on teams and from the school office as requested.

The policy is reviewed, approved and endorsed by the Governing Body annually **unless an incident, new legislation or guidance calls for the need for an immediate review.**

## **Safeguarding Statement**

The aim of our safeguarding and child protection policy is to create a 'safer culture of vigilance' in our school. We aim to have a school where:

- There is a belief that 'it could happen here'
- All children, without exception, have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs. No child or group of children will be treated any less favourably in being able to access services which meet their needs
- All staff always act in the best interests of the child. A child refers to any individual under 18 years of age
- All staff will not assume that other staff will act in relation to a concern
- All staff should be aware of the process for making referrals to Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments
- All concerns and allegations of abuse will be taken seriously by staff and volunteers and responded to appropriately - this may require a referral to Children's Services, the independent Local Authority Designated Officer

(LADO) for allegations against staff and other volunteers and, in emergencies, the police

- Key individuals and their specific safeguarding roles are identified and known to the whole school community
- We have a commitment to safer recruitment, selection and vetting
- The policy is shared with children and parents as appropriate
- The Headteacher ensures the policy is followed by all members of staff

**The procedures within our Child Protection Policy apply to all staff, volunteers, visitors and governors. All procedures have been written in accordance with Keeping Children Safe in Education 2024 and reflect local safeguarding arrangements including the Tower Hamlets Safeguarding Children Partnership Supplementary Guidance documents on Child Protection Procedures and the Management of Allegations and Concerns that do not meet the Harm Threshold.**

## **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, 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 (DSL) 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 **Woolmore Primary School**.

## 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:

- Section 175 of the Education Act 2002 (Local maintained schools only)
- Section 157 of the Education Act 2002 (Independent schools only, including academies and Free Schools)
- The Education (Independent School Standards) Regulations 2014 (Independent schools only, including academies and Free Schools)
- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- Human Rights Act 1998
- The Equality Act 2010
- Data Protection Act 2018 and the GDPR
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2023 (HM Government December 2023, Updated 23<sup>rd</sup> February 2024)
- Keeping Children Safe in Education 2024 (Department for Education, 2<sup>nd</sup> September 2024)
- Information Sharing: advice for practitioners providing safeguarding services (Department for Education, 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 (4<sup>th</sup> January 2024)
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014)
- The Teacher Standards 2012

#### **4. 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 7th Edition (London Safeguarding Children Board, 25<sup>th</sup> April 2024)
- 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 2024
- 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 2024
- 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: [https://www.towerhamlets.gov.uk/ignl/health\\_social\\_care/children\\_and\\_family\\_care/Safeguarding-Children-Partnership/Safeguarding-Children-Partnership.aspx](https://www.towerhamlets.gov.uk/ignl/health_social_care/children_and_family_care/Safeguarding-Children-Partnership/Safeguarding-Children-Partnership.aspx)

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, and participating fully in the Rapid Review process and ~~any~~ Child Safeguarding Practice Reviews.<sup>1</sup>

## 6. KEY DEFINITIONS

---

<sup>1</sup> 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.



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.

## **7. ROLES AND RESPONSIBILITIES**

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

In accordance with the statutory requirement for a named member of the Governing Body to take leadership responsibility for safeguarding at the school the Safeguarding Link Governor is Sabrina Law.

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

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

<b>Safeguarding Team</b>			
<b>Name</b>	<b>Role</b>	<b>Position</b>	<b>Email</b>
<b>Tracy Argent</b>	DDSL	HT	<a href="mailto:TArgent@woolmore.org">TArgent@woolmore.org</a>
<b>Hannah Williams</b>	DSL	DHT	<a href="mailto:Hwilliams@woolmore.org">Hwilliams@woolmore.org</a>
<b>Susan Sibley Mason</b>	DDSL	FST	<a href="mailto:SSibleymason@woolmore.org">SSibleymason@woolmore.org</a>
<b>Farzanah Seedat</b>	DDSL	AHT	<a href="mailto:FSeedat@woolmore.org">FSeedat@woolmore.org</a>
<b>Sabrina Law</b>	SG Governor	Governor	<a href="mailto:sabrinlaw84@aol.co.uk">sabrinlaw84@aol.co.uk</a>
<b>Samantha Rashid</b>	Chair of Governors		<a href="mailto:samrashid@aol.com">samrashid@aol.com</a>
<b>Hannah Williams</b>	Designated Teacher	DHT	<a href="mailto:Hwilliams@woolmore.org">Hwilliams@woolmore.org</a>
<b>Karen Attard</b>	SENDco		<a href="mailto:KAttard@woolmore.org">KAttard@woolmore.org</a>

**If the DSL is not available then one of the Deputy Designated Leads will be able to respond to any concern. In the event of a safeguarding concern outside of school hours the contact number for the DSL will be made available to the most senior member of staff left on site.**

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

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

All staff have a responsibility to report safeguarding concerns immediately to the DSL. All staff have a responsibility to report

safeguarding concerns immediately to the DSL or directly to Children's Services and/or the police where there is a risk of serious harm. The DSL and/or deputies should always be available to discuss safeguarding concerns and if in exceptional circumstances they are not available this should not delay appropriate action being taken. All staff are also aware that they should be prepared to identify children who may benefit from early help and be aware of their role in referring cases requiring early help. In the first instance staff would discuss early help cases with the DSL or DDSLs. Concerns relating to children are recorded using the yellow Record of Concern. It is expected that staff and volunteers verbally pass on concerns to the DSL or DDSLs without delay. If in doubt about any safeguarding matter, staff should always speak to the DSL or in their absence one of our DDSLs. All staff are expected to keep the school values at the core of their daily conduct and understand that they have a legal duty to safeguard the child. Ultimately, the best interests of the child must be at the centre of all decision making, behaviours and action taken in relation to children.

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

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

## 8. RIGHTS OF THE CHILD

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

- 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). **Please also read our Equality Policy.** The school is committed to supporting and taking positive action towards children with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race- who may be at a disadvantage and be disproportionately vulnerable.

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

**Within the context of safeguarding and promoting the welfare of children, we support our pupils with protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. This can also include taking positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students who have a particular protected characteristic, in order to meet their specific need. This includes a duty to make reasonable adjustments for disabled children, including those with long term conditions. A school could, for example, consider taking positive action to support girls if there was evidence they**

---

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

**were being disproportionately subjected to sexual violence or sexual harassment.**

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

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

## **9. 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;

---

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

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

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves;
- has returned home to their family from care; and
- is at risk of so-called honour based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day.

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

## **10. 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 children can achieve success’ and where familial / personal circumstances have set children at a disadvantage through no fault of their own it is our job to recognise and plan how to compensate for this. True acts of equity are required to ensure all of our children have what they need, we consider ‘what will it take’ in order for all children to reach their potential and achieve success.**

## **11. 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.<sup>5</sup> All staff need to recognise that mental health may be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should be aware of the trauma and mental health impact on a child who has had adverse childhood experiences including abuse, bereavement and separation of parents. Staff should also be aware that the pandemic has had a negative impact on the mental health of many children, some of whom have never previously experienced difficulties with their mental health. However, all staff should be clear that only

---

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

appropriately trained professionals should attempt to make a diagnosis of a mental health difficulty.

**If staff are concerned about the mental well-being of a pupil then it is their responsibility to report it to the school SENDco and / DSL. The SENDco and/or DSL will work together to ensure the best and most appropriate response is sought. This will be a 1 or a combination of the following;**

- **Referral for a drop-in session with our school based therapists**
- **Supportive and thoughtful conversation with family**
- **Exploring links with the Family Support Team where triggers for mental health challenges are linked to challenges at home. This could include referrals to Early Help or the MASH depending on the concern / risk of harm.**
- **Consideration of a formal referral for a series of therapy sessions delivered by the school based therapists.**
- **Consideration of a referral to CAMHs.**
- **Further reflection and discussion with members of the Safeguarding team.**

## **12. LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN**

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

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

The DSL and Designated Teacher will work with 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.

Designated Teacher (DT): Hannah Williams

The role of the DT is to ensure as a minimum they work with the Virtual School to complete statutory duties such as the pupil ePep. As children that have lived through adverse childhood experiences the DT must ensure that all teachers understand the impact that historic



abuse and trauma may have had on a child and that it is likely to last beyond the duration of CSC involvement. Being placed in care or returning to their birth families home doesn't mean that the experiences are negated or erased. Children who are known as Looked After or Previously Looked After are especially vulnerable both emotionally and educationally and therefore require all staff to carefully think about each part of their day, their relationships and their education. Closer scrutiny of their educational outcomes is necessary so that staff can quickly respond to recognised difficulties. Cultivating a positive and trusting relationship with a Looked After or Previously Looked After child will be of the utmost importance so spending time with them, identifying strengths and building on these, following up on their work, their reading, their homework, recognising success and cultivating positive relationships with their family will be at the heart of their success.

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.

### **13. SEND CHILDREN**

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

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

- communication barriers when reporting abuse and difficulties in overcoming these barriers.

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

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

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

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

All class teachers need to know how best to support all their children. The Inclusion and Safeguarding Team work closely with all staff to ensure that they have the knowledge and skill to put things in place so that all children – including those with SEND needs – can achieve success. The values for staff guide staff behaviour to ensure that if there is doubt as to the well-being of any child including those with SEND then staff respond appropriately – seeking help where needed and expecting the help to be swift and effective. The leadership team ensure high expectations are held for themselves, middle

leaders and class teachers ensuring there is a rigorous system of accountability for everyone. For children with communication difficulties, the SENDco and SEND teacher ensure that working to enable effective communication is at the front and centre of that pupil's curriculum. Sensitive subjects such as PSHE lessons that contain important safeguarding lessons for children are delivered in an age and developmentally appropriate way so that all children have the same opportunity to be taught how to keep themselves safe.

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

At Woolmore the Attendance Team is made up of a combination of our FST / DDSLs and the school Attendance Officer. The team is line managed by the DSL and in this way safeguarding is at the heart of the work done to monitor and improve attendance. The Attendance Officer will inform the FST / DDSL and DSL of daily absences where no contact from the family has been forthcoming and attempts to contact the family have been unsuccessful. Vulnerable children, those subject to CIN or CP plans and those where they are known to be currently subject to an assessment / investigation by CSC are

prioritised for a call back. Where this has not been successful despite several attempts then consideration would be given to a home visit. In some circumstances if a home visit has not satisfied the attendance team that the child is safe then a Welfare Call is request is made of the police via 101.

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.

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, [Nasihah.Anwer@towerhamlets.gov.uk](mailto:Nasihah.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.

## **15. ELECTIVE HOME EDUCATION**

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

less visible to the services that are there to keep them safe and supported in line with their needs.

When a parent informs the headteacher of their intention to electively home educate their child, the school will convene and coordinate a meeting between the LA, relevant school staff, parents and all key professionals currently working with the child and family. In accordance with LBTH Policy this meeting 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 SEND children.

## 16. 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.

**All staff should be aware of the Whistleblowing policy available on the school website.**

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, they should consider other channels available as set out in the Government's List of Prescribed Bodies and Persons including:

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

## 17. 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 and volunteers, the school's Managing Allegations Procedures should be followed, and all action taken needs to be in line with KCSIE 2024 Part 4 and the THSCP Supplementary Guidance - Managing Allegations of Abuse against Staff – September 2024

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 (LADO) for an initial discussion. If the allegation concerns the headteacher, then the Chair of Governors shall make contact with 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](mailto:Melanie.Benzie@towerhamlets.gov.uk) or [LADO@towerhamlets.gov.uk](mailto:LADO@towerhamlets.gov.uk)

**Telephone:** 0207364 0677

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

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

**Please see our Staff Code of Conduct policy on the school website.**

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.

## **18. STAFF SAFEGUARDING TRAINING INCLUDING TRAINING FOR GOVERNORS**

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



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

Governors are required to complete the following safeguarding training;

- Induction via Governor Hub on The Key which includes;
  - Reading KCSIE 2023 and completing the staff sign-up sheet
  - Attending in person whole school safeguarding training at the beginning of the academic year. This will include key messages from KCSIE 2023.

Staff receive safeguarding training via the following;

- Staff induction pack includes a copy of the CP policy and Code of Conduct
- Reading KCSIE 2023 and completing the staff sign-up sheet
- Attending in person whole school safeguarding training at the beginning of the academic year. This will include key messages from KCSIE 2023.
- Weekly safeguarding bulletins during whole staff briefing
- Intermittent safeguarding updates sent via emails
- Continuous specific safeguarding training throughout the year as part of whole staff training; Prevent, Online Safety, Staff Code of Conduct

During whole staff training a register is taken and a mop-up session is scheduled for staff who were unable to attend.

## **19. VISITORS**

When the school receives visitors, depending on the role of the visitor, specific safeguarding checks are carried out in line with the KCSIE 2024. Adults in regulated activity are required to show an accepted form of photo ID along with a copy of their enhanced DBS which always includes a barred list check which has been issued by their current employer (agency). We work with agencies to ensure the full battery of safeguarding checks have been carried out before allowing them entry into the building. Where we have visitors who are not engaging in regulated activity then it is a requirement that a member of the staff team accompany them throughout the day and the safeguarding responsibilities they have are explained fully to them.



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

## **20. EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS**

Before any external visit takes place, staff are required to create a risk assessment which is then agreed by the EVOLVE coordinator and head teacher. All staff are aware that our safeguarding and child protection policy remains in place for staff and children when off site. When pupils attend off-site activities such as day or residential trips risk assessments are also carried out with the activity provider so that children are kept safe to and from location and whilst they are staying there. This includes overnight visits.

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 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 Keeping Children Safe during community activities, after school-clubs and tuition: non-statutory guidance for providers running out-of-school activities (April 2022). The school will ensure that all safeguarding requirements are set out clearly in the lease or hire agreement with the organisation, as a condition of use and occupation of the school premises; and that failure to comply would lead to the termination of the agreement.

## **21. IDENTIFYING ABUSE**

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

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

## 22. INDICATORS OF ABUSE

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

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

**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](#) toolkit and all school staff understand their important frontline role in identifying children who may be suffering from Neglect.

## **23. 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 Woolmore being Safe is one of our three rules. Children are taught what this means throughout the school day in conversations with adults as part of our daily interactions. We look for safe walking and we will speak to children when interactions are not safe. All children are familiar with this rule and this makes it applicable to different settings eg the home and in the community. In PSHE we teach children about what healthy relationships look and feel like and in conjunction with their understanding about what safe behaviours are our children build an understanding of what doesn't feel safe too. We reiterate the message of safe adults or trusted adults who children can talk to if they would like to. Building positive trusting relationships is at the core of our approach to ensuring all children can achieve success – it is our aim that the adults in the school are the trusted adults with whom children can confide in when things don't feel safe.

## **SAFEGUARDING ISSUES**

### **24. CHILD SEXUAL EXPLOITATION**

Child Sexual Exploitation is a form of child sexual abuse. CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Apart from age other factors that could make a child more vulnerable to exploitation, include gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually

inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

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

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

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

Staff understand that Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm. One of the key factors found in most cases of child sexual exploitation is the presence of some form of exchange (sexual activity in return for something)

for the victim and/or perpetrator or facilitator. Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). It is critical to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a child/young person does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange: for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family. While there can be gifts or treats involved in other forms of sexual abuse (e.g., a father who sexually abuses but also buys the child toys) it is most likely referred to as child sexual exploitation if the 'exchange', as the core dynamic at play, results in financial gain for or enhanced status of, the perpetrator. Where the gain is only for the perpetrator/facilitator, there is most likely a financial gain (money, discharge of a debt or free/discounted goods or services) or increased status as a result of the abuse. If sexual gratification, or exercise of power and control, is the only gain for the perpetrator (and there is no gain for the child/young person) this would not normally constitute child sexual exploitation, but should be responded to as a different form of child sexual abuse (Child Sexual Exploitation, February 2017). For further information staff can read the Home Office Statutory Guidance on Child Sexual Exploitation as well as speaking to the DSL.

At Woolmore we understand that our children are growing up in an increasingly complex world which presents opportunities, on and offline, but also challenges and risks. Our aim is for our PSHE curriculum to teach our children how to be critical thinkers and how to keep themselves healthy, but also how to successfully manage their personal and social lives in a positive way. We want our children to develop positive personal attributes which are embedded in our school values: the ability to care for each other and keep each other safe, be kind, be effective communicators and to work together, celebrating and respecting difference. PSHE is taught sensitively and inclusively with an understanding that this subject is key in enabling our children to cultivate healthy respectful relationships in all contexts. We value teaching children about their own mental wellbeing: we believe it is a priority to ensure their happiness. We want to empower children to face life's challenges, with a knowledge and the capability to take care of themselves and keep themselves healthy. By fostering pupil wellbeing, nurturing self-belief and enabling them to develop resilience we aim to help them become successful and productive members of society who believe they can achieve their goals.

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

## **25. 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 'trap house 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](#).

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

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

## **26. SERIOUS YOUTH VIOLENCE**

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

## **27. ONLINE HARMS**

Children should have the right to explore the digital environment but also the right to be safe when on it. However, technology often provides the platform that facilitates harm, and the use of technology has become a significant component of many safeguarding issues. Examples of which include child sexual exploitation; child criminal

exploitation; radicalisation; sexual predation/grooming; and forms of child-on-child abuse such as cyberbullying and nudes and semi-nudes.

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, 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/>).

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](https://cyberchoices.uk)), which provides early intervention where children are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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

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

The designated safeguarding lead (DSL) Hannah Williams has lead responsibility for filtering and monitoring and works closely with Clever ICT to implement the DfE filtering and monitoring standards, which require schools to:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

We look to provide 'appropriate filtering and monitoring' (as outlined in Keeping Children Safe in Education) at all times.

We ensure ALL STAFF are aware of filtering and monitoring systems and play their part in feeding back about areas of concern, potential for students to bypass systems and any potential over blocking. They can submit concerns at any point via the DSL and/or Computing Lead (depending on the issue) and will be asked for feedback at the time of the regular checks which will now take place.

Technical and safeguarding colleagues work together closely to carry out annual reviews and check and also to ensure that the school responds to issues and integrates with the curriculum.

We carry out checks throughout the year to ensure all systems are in operation, functioning as expected, etc and an annual review as part of an online safety audit of our strategy. We understand that as a request is made from a device in our school it reaches a firewall which is set up by LGFL. The firewall contains Domain Naming System (DNS) information – in the form of 2 addresses – which form the basis of our filtering system. There are 2 addresses set up as a fail-safe in case one fails.

We use templates from LGfL for this documentation.

## SAFE SEARCH

Safe Search is enforced on any accessible search engines on all devices used by children or staff. It is a setting which remains on permanently.

We recommend the use of Google and Bing. Staff are advised not to use Yahoo or other search engines as they are not as reliable. Our browsers default to Google or Bing.

Our YouTube mode is '**strict**'. Teacher's login setting is **moderate** as long as they are logged into their google account - this is to avoid over-blocking. But the default setting for children is **strict** and this is set by Domain Naming Service (DNS) with Clever ICT setting the parameters within school – it can be adjusted according to need.

During the past year, we have had 0 incidents of breaches of our filter system. This tells us that use of the devices in school is safe. Staff are physically checking pupil use of Chrome books and the systematic reports generated show that our current filtering system is effective.

During out of hours all chrome books are considered 'managed devices' – so they are only useable with a student account and student login. Currently chrome books do not get sent home – where there are rare exceptions this is

done with a conversation with the family and in the context of our acceptable user agreements for children.

Staff will be reminded of the systems in place and their responsibilities at induction and start of year safeguarding as well as via AUPs and regular training reminders in the light of the annual review and regular checks that will be carried out.

The DSL checks filtering reports and notifications each month as a minimum and will randomly generate reports at any point in the year – aiming to do it 12 times per year. The DSL will work with the Clever ICT to take any necessary action following analysis of these reports. We use the reports which are autogenerated by LGFL against the 5 parameters including Blocked Content and Top Blocked Websites. An important parameter is checking to see what websites have been allowed as this gives us an indicator of the effectiveness of the filtering system. We also do an independent check using the following website; **testfiltering.com**

According to the DfE standards, “a variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- network monitoring using log files of internet traffic and web access

At Woolmore we use the above strategies to monitor the use of online devices. Staff devices are managed by Microsoft and as will all managed devices on the network we can see what websites are being searched. Additionally, devices such as school mobiles and iPads are enrolled with Meraki – which is also a management device system. Meraki would enable school devices to be located if lost and if necessary wiped remotely of all information.

If there has been a breach of the filter that has been reported we have the capacity to generate an ‘on demand’ report to understand what the breach was. We will continue to work with Clever ICT to evaluate the risks of a filter breach and the need for a in the moment monitoring system.

Our checks to our filtering provision are recorded as part of our filtering and monitoring review process.

When checking filtering and monitoring systems we make sure that the system setup has not changed or been deactivated. Our checks include a range of:

- school owned devices and services, including those used off site (if necessary)
- user groups, for example, teachers, pupils and guests
- a separate check of photos of students is also completed and recorded

We record the following:

- when the checks took place

- who did the check
- what they tested or checked
- resulting actions

We make sure that:

- all staff know how to report and record concerns
- filtering and monitoring systems work on new devices and services before releasing them to staff and pupils
- blocklists are reviewed and they can be modified in line with changes to safeguarding risks

In the event that children have to revert to home learning again a combination of our Acceptable User policies for adults and children will be the first step in keep children safe. We would ensure that online safety is embedded within the curriculum, to help our pupils understand the risks and responsibilities associated with the internet. This would include continuing to teach them about issues such as cyberbullying, online grooming, and exposure to harmful content. We would ensure our monitoring systems were adjusted where children were using school devices at home to track students' online activity. Additionally, we would ensure that staff training was updated to reflect the different learning environment and all staff felt confident in identifying and responding to safeguarding concerns in as they arose. Clear communication channels would remain for pupils and staff to report concerns, and we would ensure that online interactions were age-appropriate. Finally, we would work more closely with parents and carers to support safe online practices at home, reinforcing the shared responsibility for safeguarding children in today's connected world.

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.

**Please see our Online Safety Policy, Behaviour Policy, and the Acceptable User Agreements for staff and pupils**

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

**We use the LGFL risk assessment to allow us to rate our online provision which supports us in continually risk assessing throughout the academic year.**

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.

## **28. 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.

**We understand that we can contact Tower Hamlets Violence Against Women and Girls Team for support required on any of the VAWG strands including training needs. Please contact the Prevent Training Officer: [Amy-Kate.Garwood2@towerhamlets.gov.uk](mailto:Amy-Kate.Garwood2@towerhamlets.gov.uk). We can also sign up to the VAWG Pledge.**

## **29. 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 Honour 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.

### **We are aware of the HM Government Multi-Agency Statutory Guidance on FGM, Updated 30<sup>th</sup> July 2020**

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

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

## **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 [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

**We are aware of the Forced Marriage Unit's Statutory Guidance and Multi Agency Guidelines The Right to Choose Updated June 2022.**

## **VIRGINITY TESTING AND HYMENOPLASTY**

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

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

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

## **30. 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).

**We understand our duties as written in the Statutory guidance on the Prevent duty 2023 (Updated March 2024), which explains our responsibilities under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism, specifically paragraphs 141-207 which pertain to Education.**

**The DSL works with the Prevent Officer to complete and review our Prevent Risk Assessment and Prevent Checklists as part of our Prevent Duty** (The Prevent duty: safeguarding learners vulnerable to radicalisation. Support for those working in education settings with safeguarding responsibilities (Department for Education, October 2022). We ensure that staff training opportunities are built into staff CPD and the curriculum enables pupils to discuss issues of religion, ethnicity and culture, promoting fundamental British Values as part of our broader SMCS content.

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

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

### 31. CHILD-ON-CHILD ABUSE

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

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

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

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

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse such as biting, hitting, kicking or hair pulling
- sexually harmful behaviour and sexual abuse including inappropriate sexual language, touching, sexual assault or rape
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos
- teenage relationship abuse – where there is a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner

- upskirting – taking a picture under a person's clothing without their knowledge and/or permission with the intention of viewing their buttocks or genitals (with or without underwear) to obtain sexual gratification. It is a criminal offence.
- initiation/hazing - used to introduce newcomers into an organisation or group by subjecting them to a series of trials and challenges, which are potentially humiliating, embarrassing or abusive.
- prejudice and discrimination - behaviours which cause a person to feel powerless, worthless or excluded originating from prejudices around belonging, identity and equality, for example, prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

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

Although a child identifying as LGBTQ+ is not in itself a safeguarding concern, such children may be more vulnerable to forms of child-on-child abuse. This includes children who are perceived to be LGBTQ+ even though they do not identify as such. The school is committed to providing a safe space for LGBTQ+ children to share any concerns they may have and in ensuring an inclusive culture is maintained.

At Woolmore our safeguarding procedures which are in place to minimise the risk of Child on Child Abuse include the emphasis on Respect as a core values. Staff understand that it is part of their duty to model these values and actively teach them to the children either explicitly or implicitly in our everyday practice. Teachers spend time listening to children when they have concerns, no matter how small, and in these conversations staff model how our values keep us safe. Children understand the importance of keeping ourselves and each other safe and can expect a consistent response from all adults. Staff know the expectation for responding to concerns from children is to record behaviours on a Think it Through reflection sheet which is passed on to the Inclusion Lead who records incidents for analysis so patterns of behaviour can be identified and support directed to the right place. Where concerns are greater the DSL and/or DDSL will respond in a timely manner, prioritising the concern and working to repair the relationship between the children where possible. Children

are taught that these situations are sometimes opportunities for emotional growth, acknowledging mistakes, not being shamed but realising there is a value in making amends. Staff are also expected to schedule follow ups with all children involved. We see these situations as opportunities to make sure the children feel successful – even if that takes several attempts and several follow ups. We give immediate consideration to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

We consider the following.

- We consider the wishes of the victim in terms of how they want to proceed.
- We consider the nature of the alleged incident(s).
- We consider the ages and the developmental stages of the children involved;
- We consider any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- We consider whether the alleged incident is a one-off or a sustained pattern of abuse.
- We consider whether there are ongoing risks to the victim, other children, or school staff.

We consider every report on a case-by-case basis. When to inform the alleged perpetrator will be a decision that should be carefully considered. We consider the proportionality of the response. Support and consequences are considered side by side

## **32. 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 Services, the Police and other specialist services.

**Our response and will take when reports of child-on-child sexual violence and sexual harassment are brought to the attention of the DSL are in accordance with Keeping Children Safe in Education 2023 Part 5. Members of the safeguarding team have attended training on how to respond to allegations of this nature. We use the text Understanding and Managing Sexual Behaviours in Education Settings , 2021.**

### **33. YOUTH PRODUCED SEXUAL IMAGERY**

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

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

It could also involve sharing between devices via services like Apple's AirDrop which works offline. Nude or semi-nude images, videos or live streams may include more than one child or young person.

Incidents may also occur where:

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

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

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

### Record Keeping

We understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of our school may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. As per Part one of KCSIE 2023 guidance, staff understand that if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual

violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

When managing a report we understand that effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy)
- careful management and handling of reports that include an online element. Including being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for our staff **not to view or forward illegal images of a child**. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection

Staff know not to promise confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or a deputy) or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.

We keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation

We understand the importance of listening carefully to the child, reflecting back, using the child's language, being non-judgemental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was

We consider the best way to make a record of the report understanding that best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made

It is important to understand that the adult only records the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by local authority children's social care and/or part of a criminal investigation, and

all staff understand the importance of informing the designated safeguarding lead (or a deputy), as soon as practically possible, if the designated safeguarding lead (or a deputy) is not involved in the initial report. **We reference UKCIS's non-statutory guidance, Sharing Nudes and Semi-Nudes. Advice for Education Settings working with Children and Young People Updated March 2024.**

### **Risk Assessments**

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

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

Risk assessments would be recorded (paper or electronic) and kept under review. At all times, we would be actively considering the risks posed to all their pupils and students and put adequate measures in

place to protect them and keep them safe. The designated safeguarding lead (or a deputy) should ensure they are engaging with local authority children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Our risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school or college approach to supporting and protecting their pupils and students and updating their own risk assessment.

### **Ongoing Response and Support for Victim and Perpetrator**

In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or that referrals to statutory services are not required, and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support. Our response would be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment at Woolmore, and it is never acceptable and will not be tolerated.

It is important each report is considered on a case-by-case basis and risk assessments are updated as appropriate. As always when concerned about the welfare of a child, the best interests of the child should come first.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes they share with the victim. We would also consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during before and after school-based activities) and on transport to and from school where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s). As per paragraph 505 of KCSIE 2023, close liaison with the police is essential. Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school or college should take suitable action, if they have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view



that allowing the perpetrator(s) to remain in school would seriously harm the education or welfare of the victim (and potentially other pupils or students). Where a criminal investigation into sexual assault leads to a conviction or caution, we would, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.

Where the perpetrator(s) is going to remain at school, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on school premises. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases. In all cases, we would record and be able to justify our decision making.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support should be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. In all cases, we would record and be able to justify our decision-making. All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

The following principles are based on effective safeguarding practice and would help shape our decisions regarding safeguarding and supporting the alleged perpetrator(s):

We understand that we would have a difficult balancing act to consider. On one hand, the need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

- Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. More information on HSB can be found at paras 455-458 in KCSIE 2023. Advice would be taken, as appropriate, from local authority children's social care, specialist sexual violence services and the police.
- The Lucy Faithfull Foundation has developed a HSB toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.
- The NSPCC provides free and independent advice about HSB: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.
- Contextual Safeguarding Network – Beyond Referrals (Schools) provides a school self-assessment toolkit and guidance for addressing HSB in schools.
- StopItNow – Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Advice on behaviour in schools is clear that teachers can sanction pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair. We could be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions

are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead should take responsibility to ensure this happens as well as transferring the child protection file.

## YOUTH PRODUCED SEXUAL IMAGERY (YPSI)

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

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

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

and Semi-Nudes. Advice for Education Settings working with Children and Young People 2020.

### **What to do if an incident comes to your attention**

Report it to the Designated Safeguarding Lead (DSL) or equivalent immediately.

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if someone has shown it to you before you could stop them), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

### **Staff are aware of legislation surrounding sharing of sexual imagery by young people, specifically:**

- it is an offence to possess, distribute, show and make indecent images of children;
- the Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18. 'Indecent' is not defined in legislation.

When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or District Judge to decide based on what is the recognised standard of propriety. For most purposes, if imagery contains a naked young person, a topless girl, and/ or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other

agencies when responding. It also presents a range of risks which need careful management. Woolmore understands the phrase 'youth produced sexual imagery' and uses this instead of 'sexting.' This is to ensure clarity about the issues this policy addresses. 'Youth produced sexual imagery' best describes the practice because:

- 'youth produced' includes young people sharing images that they, or another young person, have created of themselves;
- 'sexual' is clearer than 'indecent' - a judgement of whether something is 'decent' is both a value judgement and dependent on context;
- 'imagery' covers both still photos and moving videos.

The types of incidents which this covers are:

- a person under the age of 18 **creates** and **shares** sexual imagery of themselves with a peer under the age of 18;
- a person under the age of 18 **shares** sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult;
- a person under the age of 18 is in **possession** of sexual imagery created by another person under the age of 18.

Sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives. 90% of 16-24 year olds and 69% of 12-15 year olds own a smartphone, giving them the ability to quickly and easily create and share photos and videos. This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. Staff understand that this can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation.

### Initial response

All incidents involving youth produced sexual imagery should be responded to in line with our Safeguarding and Child Protection policy and reported to the DSL or Deputy DSLs. When an incident involving youth produced sexual imagery comes to our attention the following procedure is followed.

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff.

- There should be subsequent interviews with the young people involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral should be made to Children's Services and/or the police immediately.

### Initial meeting

The initial review meeting should consider the initial evidence and aim to establish:

- whether there is an immediate risk to a young person or young people;
- whether a referral should be made to the police and/or Children's Services;
- whether it is necessary to view the imagery in order to safeguard the young person – **in most cases, imagery should not be viewed**;
- what further information is required to decide on the best response;
- whether the imagery has been shared widely and via what services and/or platforms (this may be unknown);
- whether immediate action should be taken to delete or remove images from devices or online services;
- any relevant facts about the young people involved which would influence risk assessment;
- whether there is a need to contact another setting or individual;
- whether to contact parents or carers of the pupils involved -- in most cases parents should be involved.

An immediate referral to police and/or Children's Services would be made if at this initial stage:

1. the incident involves an adult;
2. there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs);

3. what you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
4. the imagery involves sexual acts and any pupil in the imagery is under 18;
5. you have reason to believe a pupil is or pupils are at immediate risk of harm owing to the sharing of the imagery -- for example, the young person is presenting as suicidal or self-harming. If none of the above applies, a school may decide to respond to the incident without involving the police or Children's Services (a school can choose to escalate the incident at any time if further information/concerns come to light).

Woolmore 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. As part of a whole school approach we are 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.

All staff should report Online Safety concerns about pupils to the DSL 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.

#### 1.6(a) Defining an incident of YPSI

Finkelhor and Wolak's typology of youth-produced imagery cases can be used to define and assess incidents according to motivations.

Incidents can broadly be divided into two categories:



**aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes.

**experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse.

1.6(b) Assessing behaviour the DSL will need to be mindful that behaviour, which may not initially appear to be sexually motivated, may have occurred as a result of risky or harmful behaviour or sexual abuse being 'normalised' for children and young people.

Hackett's 'Continuum of children and young people's sexual behaviours' model can also help practitioners to understand that children and young people's sexual behaviours exist on a wide continuum from normal to abusive and violent behaviours, and may move fluidly between each category. It is important to note that an isolated incident that demonstrates problematic or abusive behaviour may not necessarily be indicative of the child or young person's overall sexual behaviour. The incident should be dealt with proportionally to the behaviour being displayed.

#### **34. 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 2024 and Behaviour in Schools. Advice for Head teacher and School Staff (September 2022).

**Staff are to refer to our Anti-Bullying Policy when responding to incidents of Bullying/Cyberbullying.**

#### **35. HOMELESSNESS**

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. The

Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

The DSL will raise concerns at the earliest opportunity about a family at risk of homelessness through the Tower Hamlets Homeless and Housing Options service.

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. However, it is also recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and should be contacted in the first instance. For general enquiries about support for young people who might be at risk of or experiencing homelessness in the borough, please contact Tower Hamlets Housing Options: [Host@towerhamlets.gov.uk](mailto:Host@towerhamlets.gov.uk)

### **36. 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.

### **37. 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.

### **38. 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.

### **39. YOUNG CARERS**

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

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

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

It is estimated by the Children's Society that 1 in 5 children are young carers and many are hidden and unidentified. School recognises that young carers have the right to an assessment by the Local Authority to identify needs and support and the person they are caring for can have a reassessment of their needs.

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

#### **40. 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.

#### **41. MODERN SLAVERY**

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

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

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

## 42. 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 **or ROC and take immediately to a member of the safeguarding team**
- seek support for yourself if you are distressed.

## 43. EARLY HELP

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

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

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

At Woolmore 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. 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 in this policy. All staff are aware they may be required to make referrals and work alongside other agencies, sometimes taking the place as the Lead Professional for TAC / TAF meetings and supporting families who are experiencing challenging situations. At the heart of this work, like all safeguarding work, is the drive to cultivate positive and trusting relationships with our families – in line with our school values. We are fortunate to have one dedicated Family Support Workers who is also a DDSL and works with Early Help to support families where necessary.

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

### **Social Inclusion Panel**

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

The DSL will apply the 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.

#### **44. 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.

In some circumstances the parents may not be immediately informed due to the nature of the disclosure for example, if the section 47 threshold has been met and risk of immediate danger is posed. This is most likely upon the advice from the MAST team. Otherwise staff will aim to speak with families on the day of the disclosure. If the pupil has committed a crime a referral will be made to the police. When making referrals to Children's Services the DSL will always consider wider environmental factors that pose a threat to their safety or



welfare. The DSL will gather as much contextual information as possible to support the referral. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to Children's Services for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. When the DSL makes a referral to Children's Services or to other external agencies, the information will be shared in line with confidentiality requirements. The DSL will work alongside external agencies -- maintaining close liaison and taking advice and support, as well as offering challenge to decisions where necessary. The DSL / DDSL is committed to keep constant communication with pupils and parents. Staff are aware that that they need to follow up their referrals, support social workers if they carry out a statutory assessment and consider following local escalation procedures to ensure their concerns are addressed and that the pupil's situation improves. The DSL is responsible for ensuring all concerns, discussions and decisions made and the reasons for those decisions are recorded in writing. Communicating concerns to parents; staff reporting concerns will not be at a detriment from doing this, and parent/carers will not be made aware of who reported the concern within the school. The DSL will make a decision, often in collaboration with the HT or DDSLs, regarding the best time to speak to parents.

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.

#### **45. CONFIDENTIALITY AND SHARING INFORMATION**

Staff should never assume a colleague or another professional will take safeguarding action through the sharing of information that might be critical

in keeping children safe. Staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Serious Case Reviews have highlighted failures in safeguarding systems in which people did not share information at the earliest opportunity or did not share at all. If in any doubt about sharing information, staff should speak to their Designated Safeguarding Lead or a deputy.

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

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

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

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

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

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. At Woolmore we ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. This includes; understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

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.

#### **46. 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.

##### **Record of Concern (ROC Form)**

Any member of staff or volunteer who has concerns about the safety or potential abuse of a child must report their concerns orally to a member of the safeguarding team without delay. It is expected that a written account of the concern or disclosure follow as soon as possible.

The member of staff is also aware of their duty to communicate with the Local Authority if necessary.

- A written account of the disclosure must be made on the school's Record of Concern (ROC).
- The ROC must be given to the DSL or deputy immediately. If, in exceptional circumstances, the DSL or Deputies are not available, this should not delay appropriate action being taken. All staff are aware of how to report concerns to the local authority's statutory services or police.
- It must include as much information as possible – including time, date, exact words used in a disclosure, specific description to visible marks and their location, or a general description of how a child's behaviour and/or demeanour has changed, giving a sense of concern for the child's experience outside school.
- The DSL will act on the information and report the outcomes back to the member of staff.

Options include: managing any support for the child internally via the school or college's own pastoral support processes; an early help assessment or a referral for statutory services, for example as the child is in need or suffering or likely to suffer harm; If a child is in danger the referral will be made to the police.

#### **47. 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.

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

**Updated:** November 2024  
**Agreed**  
**by Governors:**  
**Review date:** September 2025

Appendix 1: MAST Poster

## Multi-Agency Support Team (MAST) 020 7364 3444 / 5601 / 5606 / 5358 / 7796

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

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

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

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

Important contact information:

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

September 2024

**Safeguarding**
**RECORD OF CONCERN (ROC)**

(yellow form)

When listening to and dealing with a disclosure: actively listen, do not look shocked or disbelieving; stay calm; take what the child is saying seriously; do not ask for detail; reassure the child that they are doing the right thing; do not promise to keep secrets; tell the child that you have to share this information; explain what will happen next; record the information as quickly as possible – facts not opinion; sign and date everything you record. NSPCC, 2018



Child's name:		Yr group:	Class:	DOB
Date:		Time of incident:		
Your account of the disclosure (what was said, observed, reported):				
Your response (what you did following the concern):				
Your name:			Your role:	
Action / response from DSL / Deputy DSL:				
Name:			Date:	
Teacher informed: Yes / No			Date:	
Threshold of Concern:	Level 1	Level 2	Level 3	Level 4
Logged on Safeguard Software: Yes / No			Date:	
Consider Additional Safety Checks: daily Attendance; teacher catch-up; <del>Behaviour</del> Log; Inform Intervention Teachers / therapists (school counsellor / SALT / TA) where appropriate.				
Planned Follow Up: Daily / Weekly / Monthly				



