



Gatehouse School

Safeguarding and Child Protection Policy

Approved by the Designated Safeguarding Lead:

(Fiona Tighe) Date: 8/7/2022

Approved by Nominated Safeguarding Governor:

(Joanna Scott) Date: 6/11/22

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1 Introduction

- 1.1 Gatehouse School is committed to safeguarding and promoting the welfare and wellbeing of children and staff. We believe everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The School recognises that children learn best when they are healthy, safe and secure.
- 1.2 Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education, September 2022.)
- 1.3 This policy applies to all pupils in the School, including those in the EYFS.
- 1.4 The purpose of this policy is to inform all staff (including supply staff), parents,(including guardians and carers), contractors, volunteers and governors about the School's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with pupils, even where this is away from the School, such as on educational visits or when delivering lessons online..
- 1.5 This policy is published on the School website and is available to parents of current and prospective pupils from the School's office or from the Designated Safeguarding Lead, Fiona Tighe, on request. Large print or other accessible formats can also be made available.
- 1.6 The policy is drafted in accordance with all relevant legislation and the following statutory guidance:
 - Keeping Children Safe in Education September 2022 (KCSIE)
 - Working Together to Safeguard Children July 2018 (WTSC)
 - Prevent Duty Guidance for England and Wales July 2015(updated April 2021)
 - Disqualification Under the Childcare Act August 2018
 - Education (Independent School Standards) Regulations 2014
 - What to do if you are worried a child is being abused – advice for practitioner's March 2015
 - Safeguarding children and young people October 2018
 - Disqualifications under the childcare act August 2018
 - Statutory Framework for the Early Years Foundation Stage March 2017
 - Children Missing Education September 2016

We follow the inter-agency procedures of the Tower Hamlets Local Safeguarding Children Partnership (THSCP).

We are advised by the Tower Hamlets Education Safeguarding Officer, whom the DSL regularly consults on safeguarding matters. Contact details are contained in Appendix 1.

[Note: Multi-agency arrangements for safeguarding children are now handled by the three safeguarding partner agencies: the local authority; the clinical commissioning group; and the police. These safeguarding partners come together to form the Local Safeguarding Children's Partnership (LSCP), replacing what used to be referred to as the Local Safeguarding Children's Board (LSCB)]

- 1.7 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

2 Principles

- 2.1 Gatehouse School is committed to safeguarding and promoting the welfare of all pupils in our care, and expects all staff, governors and volunteers to share this commitment. To achieve this, the School seeks to create a safe school environment and a strong pastoral system where pupils who have been subject to any form of abuse can report the matter confident that it will be taken seriously. They will not be made to feel ashamed of making a report and will be fully supported. Staff are trained to listen to pupils' concerns, identify issues early and respond appropriately following agreed procedures. The School will consider, at all times, what is in the best interest of the child and act accordingly.
- 2.2 The School will take all reasonable measures to:
- ensure that we practise safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the School's Safer Recruitment Policy;
 - ensure that, where staff from other organisations are working with our pupils on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;
 - follow the inter-agency procedures of the Tower Hamlet Safeguarding Children Partnership and contribute to inter-agency working;
 - support pupils in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach;
 - be alert to signs of abuse, both in the School and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
 - consider whether children are at risk of abuse or exploitation in situations outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.
 - deal appropriately with every suspicion or complaint of abuse and support pupils who have been abused in accordance with their agreed child protection plan;
 - design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations;
 - be alert to the needs of pupils with physical and mental health conditions;
 - operate robust and sensible health and safety procedures;
 - operate clear and supportive policies on drugs, alcohol and substance misuse;
 - assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
 - identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
 - take all practicable steps to ensure that School premises are as secure as circumstances permit;
 - teach pupils about safeguarding issues and about how to keep themselves safe (including on-line); and when working from home online

- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

3 Roles and responsibilities

3.1 Safeguarding and child protection is everyone's responsibility. All staff (including governors, supply staff and volunteers) are under a general legal duty to:

- contribute to providing a safe environment in which children can learn;
- consider at all times the best interests of the pupil and take action to enable all pupils to have the best outcomes;
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL;
- be aware of indicators of the different forms of abuse, neglect and emergent mental health issues;
- assist children in need and to protect children from abuse, neglect, radicalisation and extremism;
- be familiar with the School's policies pertaining to safeguarding and child protection procedures (see section 16.9) and follow them;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and
- support social services and any other agencies following any referral.
- maintain confidentiality- reports of sexual violence and sexual harassment need to consider confidentiality and anonymity in relation to the impact on social media breaching confidentiality. Risk assessments need to be carried out which state the time and location of the incident and any action required to make the location safer.

3.2 The Designated Safeguarding Lead (DSL)

The School has appointed a Designated Safeguarding Lead (DSL), Fiona Tighe, who is a senior member of staff and member of the School's leadership team. The DSL takes lead responsibility for safeguarding (including on-line safety) and child protection and is the first point of contact for parents, pupils, staff and others if they have any concerns about safeguarding or child protection. The School also has four Deputy DSLs (Sevda Korbay, Aileen Reidy, Jenni Veitch and Freya Williams - one currently on maternity leave), ensuring that there is always an appropriately trained and designated person in the School at all times.

The DSL will be given the time, funding, training resources and support to ensure they are able to fulfil all the key aspects of their as described in KCSIE (SEPT 2021)

Managing Referrals: the DSL will manage the referral of cases of suspected abuse, neglect, radicalisation or any other relevant issue to the Local Authority Social Care Service, Channel programme, DBS and/or Police as appropriate.

- **Working with others:** the DSL will be the principal point of contact for all staff and when co-ordinating different departments and functions within and outside the School in the management of a case. They will promote supportive relationships with parents and carers to safeguard pupils' welfare, be able to identify the causes and consequences of issues that children are experiencing and to support staff to make appropriate adjustments in the provision of educational programmes.

- **Information sharing and managing the child protection file:** the DSL is responsible for keeping child-protection files up to date with accurate and complete records of any actions or decisions taken and ensuring these confidential records are securely stored and, where appropriate, transferred to a new school promptly.
- **Raising Awareness:** the DSL is responsible for reviewing and updating the School's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and for ensuring that parents can access the policy and know that the School may make referrals where abuse or neglect is suspected.
- **Training, knowledge and skills:** the DSL will receive the appropriate level of training, together with regular updates, to ensure they are able to understand the unique risks associated with online safety, to be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at school or School and to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.
- **Providing support to staff:** the DSL should receive sufficient support and training so that they can support staff and help them feel confident on welfare, safeguarding and child-protection matters, including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support.
- **Understanding the views of children:** the DSL should, through training, develop the knowledge and skills needed to encourage a culture of listening to children and taking account of their wishes and feelings among all staff. They should promote an understanding of the difficulties that children may have in approaching staff about their circumstances and help staff consider how to build trusted relationships which facilitate communication.
- **Understanding the rights of the child:** the DSL will be aware of the requirement for children being investigated by police to have an appropriate adult in attendance.

3.3 Deputy Designated Safeguarding Leads (DDSL)

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of a long-term absence of the DSL, a deputy will assume responsibility for all the activities described above. On a day-to-day basis safeguarding activities may be delegated to a DDSL but ultimate lead responsibility for safeguarding and child protection remains with the DSL.

3.4 Head Teacher

The Head Teacher is responsible for ensuring that the procedures outlined in this Policy are followed on a day-to-day basis. To this end the Head will ensure that:

- the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- the allocation of sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively is given, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;

- matters which affect pupil welfare are adequately risk assessed by appropriately trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
- systems are in place for children to express their views and give feedback which operate with the best interests of the child at heart;
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy;
- pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- ensure safer recruitment procedures in line with Part 3 of KCSIE, September 2020 are being adhered to;
- they act as case manager and liaise with Local Authority Designated Officer (LADO) before taking any action and on an ongoing basis, where an allegation has been made against a member of staff or volunteer; and
- they notify the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority of anyone who has harmed or may pose a risk to a child.

3.5 Governing Body

The Governing Body has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of pupils. It is the role of the Governing Body to provide scrutiny of Safeguarding Policy and practice. The Governing Body takes seriously its responsibility to fulfil its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end the School Governors ensure that:

All governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated.

- an effective, up to date child protection policy is in place and made available on the School's website;
- other policies, as prescribed Part 2 of KCSIE, are in place and operational;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register;
- all staff receive safeguarding training in accordance with this Policy;
- pupils are taught about safeguarding, including online safety;
- Gatehouse School's safeguarding arrangements take into account the procedures and practice of the Tower Hamlets Safeguarding Children Partnership;
- Gatehouse School contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified;
- appropriate filters and monitoring systems are in place to keep children safe online; and
- Gatehouse School reports to their local authority any child who joins or leaves the School at non-standard transition times in line with statutory and local authority guidance.

3.6 Safeguarding Governor

School governors have appointed a nominated governor for safeguarding to take a lead in relation to responsibility for monitoring the operation of safeguarding arrangements. The nominated Governor, Joanna Scott,

- discusses safeguarding matters with the DSL at least once a term and more regularly if needed;
- liaises directly with the local authority and/or partner agencies where appropriate; and
- undertakes an annual audit of the School's safeguarding procedures and submits a written report to the Governing Body with recommendations for further improvements. The annual written report will typically consider: the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of safeguarding issues; referral management; the contribution the School is making to inter-agency working; and the provision for teaching pupils how to keep themselves safe. This audit will form part of the annual review undertaken by the Governing Body as a whole to ensure that all policies, procedures and training provided by the School are effective and comply with the law.

3.7 The nominated Governor for safeguarding is Joanna Scott. Contact details are set out in Appendix 1.

4 Key personnel

The DSL at the School is Fiona Tighe, who is a member of the Senior Leadership Team. If the DSL is unavailable, the role will be carried out by one of the Deputy DSLs, Sevda Korbay (Head Teacher), Aileen Reidy (Head of EYFS), Freya Williams (School Nurse) or Jenni Veitch (Head of Pastoral Care). The DSL or at least one of the Deputy DSLs are always available during the School's hours to discuss safeguarding concerns with staff, either in person or via telephone or email.

- 4.1 If the DSL and Deputy DSLs are unavailable, Outside school hours and during out of term activities, a designated member of the SLT will assume temporary responsibility.
- 4.2 Aileen Reidy oversees safeguarding within the EYFS.
- 4.3 Fiona Tighe is the designated member of staff who oversees the welfare of looked after children.
- 4.4 Contact details for all the above are contained in Appendix 1.

5 Staff training

- 5.1 Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse and neglect are concerned.
- 5.2 Induction training for all new members of staff, including temporary employees or volunteers, includes formal child protection training which covers:
 - this safeguarding policy and related policies on anti-bullying, e-safety, peer-on-peer abuse, mental health and wellbeing
 - Part 1 and Annex A of KCSIE;
 - the role, identity and contact details of the DSL and Deputy DSLs;
 - policies on acceptable use of IT and online safety*; including when they are online at home
 - the pupil behaviour policy*;
 - the School's children who go missing from education policy;
 - the staff Code of Conduct*;
 - the School's policy on Whistleblowing*; and

- an overview of Tower Hamlets Safeguarding Children Partnership's procedures.

* Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them. A proportional, risk-based approach will be taken to determine the level of information provided to temporary staff and volunteers.

All staff, including the Head Teacher and volunteers involved in regulated activity, will undertake appropriate child protection training which, in line with Tower Hamlets guidance, is updated every two years. In addition, all staff will receive safeguarding updates delivered through a combination of INSET, e-bulletin updates, and the completion of relevant e-courses on a regular basis and at least annually. This will include training in awareness that children may not be ready or know how to tell someone that they are being abused, exploited or neglected and may not recognise their experiences as harmful, there may be barriers due to language, vulnerability, disability or sexual orientation. Training will teach that this should not stop staff from having a 'professional curiosity' and reporting their thoughts to the DSL. It also includes training on how to manage a report of child-on-child sexual violence and sexual harassment. Staff will be taught how to build trusted relationships which facilitate communication. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training where appropriate.

- 5.3 All staff receive updated copies of the School policies referred to above and are required to confirm that they have read and understood them. In addition, Part 1 and, where appropriate, Annex A of KCSIE are reissued to staff whenever this statutory guidance is updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further reading on the staff section of the School's server.
- 5.4 The DSL team will regularly assess the appropriate level and focus for staff training so that it can respond to specific safeguarding concerns such as mental health, online safety, radicalisation, child sexual exploitation, Child criminal exploitation, sexual violence and harassment, and female genital mutilation.
- 5.5 The DSL and Deputy DSLs have undertaken Designated Child Protection Safeguarding training and training in locally-agreed inter-agency procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and will be updated every two years. Additional specialist training will be provided to those who have specific responsibility for safeguarding in the EYFS or for Looked After Children. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:
 - keep abreast of best practice for promoting a culture of listening to children;
 - remain up to date on the mechanics of inter-agency working as operated by Tower Hamlets Local Safeguarding Children Partnership;
 - understand the assessment process for providing early help and intervention, for example through locally-agreed common and shared assessment processes such as early help assessments;
 - have an up-to-date working knowledge of how local authorities conduct a child protection case conferences so they can contribute to these effectively when required to do so;
 - be alert to the specific needs of children in need, those with special educational needs and young carers;
 - understand and support the School with regard to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation; and
 - be able to keep proper written records of concerns and referrals.

- 5.6 All members of the Board of Governors receive training to ensure they have the knowledge necessary to discharge their collective responsibility to exercise appropriate oversight over the School's safeguarding policies and procedures.

6 Hierarchy of intervention

- 6.1 Tower Hamlets publishes threshold guidance Early HelpIT@towerhamlets.gov.uk for all agencies, professionals and volunteers in the borough, that they can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support. Children's needs are not static and they may experience different needs – at different points on the continuum – throughout their childhood years.

- 6.2 Within the continuum, there are four levels of intervention:

Level 1: universal -Children with no additional needs

These are children all of whose health and developmental needs will be met by universal services such as housing, mainstream education, primary health care, community resources alone. Children and young people at this level are achieving expected outcomes. There are no identified unmet needs or the need is at a low level and can be met by the universal services or with some limited additional advice or guidance. Children, young people, parents and carers can access these services directly.

Level 2: Early help and targeted support-Children requiring early help

These are children whose needs are not clear, not known or not being met. They may be vulnerable and showing early signs of abuse and/or neglect. Children and young people at this level are in need of coordinated early help and support from services to prevent problems from escalating and difficult to resolve.

Level 3: children and families with complex needs- Children in need

Children and families at this level will be facing complex problems which will require an integrated and coordinated response from a number of agencies e.g. children's social services, CAMHS, health services etc. Children at this level, often described as children 'in need', are unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly further impaired, without the provision of external services.

Level 4: Children with acute needs/ children at risk

These are children who are suffering or are likely to suffer significant harm. This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes.

7 Early help

- 7.1 Gatehouse School recognises the importance of providing early help to pupils to provide support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, anxiety and relationship issues.
- 7.2 Pupils are encouraged to raise concerns as soon as they are identified, either to their class teacher or directly to the Designated Safeguarding Lead, so that effective early support can be provided.

- 7.3 If staff believe that a pupil could benefit from early help, they should as soon as possible discuss the matter with the DSL who will, taking into account Tower Hamlets Safeguarding Children's Partnership threshold criteria, consider what action should be taken.
- 7.4 If early help is provided, the situation will be monitored carefully and a referral to children's social services made if the pupil's situation does not appear to be improving.
- 7.5 Gatehouse School has various mechanisms to help identify emerging problems. The School's pastoral system provides opportunities for children to seek help and support. The PSHE programme and associated policies are used to explore a wide variety of safeguarding issues including anti-bullying, cyber bullying, e-safety, mental health and Prevent in an age-appropriate way and pupils are encouraged to talk to staff if they have any worries. Staff training sessions are used to reinforce understanding of this and other welfare policies operate in practice and so that children who might benefit from early help can be identified quickly.
- 7.6 The School recognises the increased vulnerability of young people to whom any or all of the following apply:
- They are disabled or have special educational needs (whether or not they have a statutory Education, Health and Care Plan) as they are more prone to peer-group isolation or bullying, including prejudice-based bullying.
 - They do not have English as a first language.
 - They are living away from home for the first time
 - Are faced with challenging family circumstances.
 - They are looked-after children.
 - they are showing signs of being drawn into anti-social or criminal behaviour
 - They are acting as a young carer.
 - are at risk of being radicalised
 - They are showing early signs of abuse, neglect or mental health problems.
 - They may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

Such children may be more likely to need early help. Also, recognising abuse or neglect may be more difficult for these children for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a pupil's disability without further exploration;
- that pupils with special educational needs or disabilities can be disproportionately impacted by bullying without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers; and
- a disabled child's understanding of abuse.

8 What to look out for and when to be concerned

- 8.1 All staff should be aware of the types and signs of abuse and neglect so that they are able to identify pupils who may be in need of help or protection. If staff are unsure, they should always speak to the DSL.
- 8.2 Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used

to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (peer-on-peer abuse / child on child abuse). Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them, or, more rarely, by others. Abuse can take place wholly on line, or technology may be used to facilitate offline abuse. Children may be abused by an adult, or adults or by a child or children.

8.3 Staff should be aware of the four main categories of child abuse which are commonly identified:

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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.
- **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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing or 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. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

8.4 Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- County lines
- Domestic abuse
- Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)
- Forced marriage
- Radicalisation
- Peer-on-peer/ child-on-child
- Sexual violence and harassment (including upskirting)

These are defined more fully in Appendix 3 and further information is also contained in Part 1 and Annex A of KCSIE.

9 **Contextual safeguarding**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between young people outside these environments. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether pupils are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and young people may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

10 **Signs of abuse**

All staff need to be aware that pupils may be reticent about reporting abuse generally, and particularly so about peer-on-peer abuse, and therefore need to be vigilant for potential indicators that abuse may be taking place and using CPOMS to inform the DSL team of any concerns they might have.

10.1 Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):

- the pupil discloses that he or she has been abused, or asks a question which gives rise to that inference
- a pupil's injury cannot be reasonably or consistently explained, or is unusual in type or location
- a pattern or frequency of injuries is emerging
- the pupil engages in extreme or challenging behaviour or there is a sudden change in the pupil's behaviour
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss reasons
- the pupil appears neglected (e.g. dirty, hungry, inadequately clothed)
- the pupil appears reluctant to return home or has been openly rejected by parents or guardians
- the pupil's development is delayed in terms of emotional progress
- the pupil withdraws emotionally – showing a lack of trust in adults
- the pupil shies away from being touched or flinches at sudden movements
- the pupil loses or gains weight

10.2 Further guidance is provided in Appendix 3. Other sources of information on the signs of abuse include: Tower Hamlets Safeguarding Children's Partnership; the DfE advice note *What to do if you're worried a child is being abused* (2015); and the *NSPCC* website.

11 **Listening to pupils and record keeping**

11.1 Gatehouse School provides a range of opportunities for pupils to be listened to. These include form time, buddy and house systems, a School Council and a Pupil Leadership Team, Members of DSL teams, the Head of Pastoral Care and School Nurse are available at both break and lunch times for children to talk to. The Pastoral talking door is available for children to leave notes and comments. Pupil surveys are also carried out from time to time regarding general issues that may be of concern to pupils.

11.2 If a pupil discloses that he or she has been abused or neglected in some way, the member of staff should:

- immediately stop any other activity to listen;
- listen carefully to the pupil and keep an open mind - do not interrupt the child or be afraid of silences;
- limit the questioning to the minimum necessary for clarification using “what, when, how, where” but avoid using leading questions such as, “has this happened to your siblings?” which may prejudice an investigation;
- not make any attempt to investigate the incident themselves or make a decision as to whether or not the pupil has been abused;
- reassure the pupil, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy;
- discuss the conversation with the DSL as soon as possible and take no further action unless instructed to do so by the DSL or the Head;
- only share information on a need-to-know basis; and
- make a full written record of the conversation as set out below.

11.3 Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible on a cause of concern form (See Appendix 6). The recording must be a clear, precise and factual account of the conversation or observations. Where a child has made a disclosure, the record must include details of:

- its date, time and place
- what was said and done by whom and in whose presence
- where and when the incident(s) took place
- any noticeable physical signs of abuse
- any noticeable non-verbal behaviour or words used by the child.

The record should be signed by the person making it, using names, not initials. Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer.

Where a report includes an online element, staff should, where possible, avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically. Further guidance is available on what to do if viewing an image is unavoidable on:

- <https://www.gov.uk/government/publications/searching-screening-and-confiscation>
- <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

12 Procedure to be followed by staff if they have concerns about a pupil's welfare

- 12.1 If a member of staff has concerns about a pupil's welfare, including any mental health concerns, they must inform the DSL as soon as possible, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section *Allegations against members of staff (including supply staff) and volunteers* below should be followed. Staff should not assume that somebody else will take action and share information that might be critical in keeping a pupil safe.
- 12.2 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.
- 12.3 When a child is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made by the DSL to Children's Social Care. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge.
- 12.4 If a pupil is in **immediate danger** or is at **risk of harm**, is suffering or is likely to suffer from harm, a referral should be made to children's social services and/or the police **immediately**. Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible. Further guidance on when to call the police is provided by the [NPCC - when to call the police](#).
- 12.5 If a teacher discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the teacher **must** report this to the police. Unless the teacher has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed in accordance with the safeguarding procedures described in this policy. (For further details, see Annex A of KCSIE and '[Guidance for Schools](#)' information.)
- 12.6 The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.
- 12.7 Parents can report to the DSL on the welfare of any pupil in the School, whether their own child or not. If preferred, parents may discuss concerns in private with the pupil's teacher or other member of staff, who will notify the DSL.
- 12.8 Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

13 Duties of the DSL on being notified of a concern about a pupil's welfare

- 13.1 When the DSL is notified of any concerns about a pupil's welfare, he or she will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social services. A matter involving a serious criminal offence will always be referred to social services and the police immediately.
- 13.2 Factors that the DSL should bear in mind when making their decision include:
- the best interests of the child
 - the nature and seriousness of the complaint
 - contextual factors
 - the referral threshold set by Tower Hamlets Safeguarding Children Partnership

- the child's wishes or feelings
- the inter-agency procedures of Tower Hamlets Safeguarding Children Partnership
- where relevant, local information sharing protocols relating to Channel referrals.

13.3 If the DSL decides not to make a referral, but to support the pupil with early help, the DSL will keep the situation under review and consider a later referral to children's social services if the pupil's situation does not appear to be improving.

13.4 Members of the DSL team are responsible for maintaining written safeguarding records once an issue has been logged on CPOMS. These records are confidential and the only personnel within the School who have access to them are the DSL/DDSLs. Such records will include:

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

14 Making a referral to children's social services

When a pupil is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL to Children's Social Care in the local authority in which the pupil lives. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should be an inter-agency early-help assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.

If a pupil is in **immediate danger** or is at **risk of harm**, a referral should be made to children's social services and/or the police **immediately**. Further guidance on when to call the police is provided by the [NPCC - when to call the police](#). The School is not required to obtain parental consent prior to a referral being made.

14.1 If the initial referral is made by telephone, the DSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should contact children's social services again.

14.2 If the DSL or DDSL is not sure whether a referral should be made, they will consult with children's social services on a no-names basis. However, if at any stage sufficient concern exists that a pupil may be at risk of harm or in immediate danger, a referral to children's social services and/or the police will be made immediately.

14.3 If the referral is made by a member of staff other than a member of the DSL team, the DSL should be informed as soon as possible that a referral has been made.

14.4 The School is not required to obtain parental consent prior to a referral being made to statutory agencies.

- 14.5 Practitioners may 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. It would be legitimate to share information without consent where: it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent and, if to gain consent would put a child at risk.
- 14.6 If, after a referral, the pupil's situation does not appear to be improving, the DSL should contact children's social services again to follow the matter up and ensure that their concerns are addressed and the pupil's situation improves.
- 14.7 Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.
- 14.8 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it.

Informing parents

- 14.9 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer, children's social services, the police and/or the Head before discussing details with parents.
- 14.10 For Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.
- 14.11 When the School decides to refer a particular complaint of abuse to social services or the police, the parents/guardian and pupil will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.
- 14.12 For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

15 Allegations about members of staff (including supply staff) and volunteers

15.1 Guidance to staff

Guidance is given to staff to be circumspect about placing themselves in situations which may

- put themselves or their pupils at risk of harm; or
- give rise to allegations of abuse.

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the School's Staff Code of Conduct, which is issued to all staff. Particular care should be taken where staff have one-to-one meetings with a pupil.

15.2 The following procedures will be used where it is alleged that a member of staff or volunteer 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 would pose a risk of harm to children;
or
- behaved or may have behaved in a way (in or outside of School) that indicates they might not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (eg domestic violence at home).

These procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part four of *KCSIE*.

15.3 Reporting an allegation about staff

If an allegation is made about staff that appears to meet the criteria in paragraph 16.2:

- Where an allegation is made about a member of staff, supply staff, the DSL or a volunteer, the matter should be reported immediately to the Head Teacher, Sevda Korbay, or in the Head Teacher's absence to Ian Duncan, Chairman of Governors. The adult to whom the allegation relates should not be informed without the explicit consent of the LADO.
- Allegations about the Head Teacher should be reported to Ian Duncan, Chairman of Governors, without first notifying the Head. In his absence. If Ian Duncan is not available, contact the deputy chair of Governors, Jenni Beck.
- Allegations about a governor should be reported to the Chairman or the nominated safeguarding governor. If the allegation is against either the Chairman or the nominated safeguarding governor, the matter should be reported to the other.
- The Head, Chairman or nominated safeguarding governor who receives any such allegation is referred to in these procedures as the 'case manager'.

15.4 Action to be taken by the case manager

Before contacting the LADO, the case manager will conduct basic enquiries in line with Tower Hamlets procedures to establish the facts to help determine whether there is any foundation to the allegation. Nothing must be done at this initial stage that could jeopardise a future police investigation

- If the case manager is unsure whether the allegation meets the criteria in para 15.2 above, the LADO will be consulted for advice.
- Any allegations not meeting the criteria in para 16.2 will be dealt with in accordance with the Tower Hamlets Safeguarding Children Partnership's procedures. All such allegations must be dealt with as a priority so as to avoid any delay.
- The case manager will immediately (and in any event within one working day) discuss the matter with the Local Authority Designated Officer (LADO) – the person designated by the local authority to be involved in the management of allegations against people who work with children - before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to investigate the allegation until the LADO is consulted. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.
- The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a

justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.

- In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.
- Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.
- Any allegations of serious harm or abuse by any person living, working or looking after children in the nursery or EYFS years (whether that allegation relates to harm or abuse committed on the premises or elsewhere) will be notified to Ofsted as soon as practicable (and within 14 days at the latest), and include details of the action taken in respect of the allegations.
- Where an adult makes an allegation to the School that they were abused as a child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a pupil will be reported to the LADO in line with Tower Hamlets procedures for dealing with such allegations. The LADO will then coordinate with the children's social care and the police.

15.5 Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted.
- The parents of the pupil involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, including the outcome of any disciplinary process.
- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidentiality and data protection and the advice of external agencies.

15.6 Investigation

- Allegations about safeguarding are usually conducted by external agencies such as social services or the police rather than by the School. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as to how and by whom the investigation should be conducted.
- Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School's disciplinary code will commence until any external investigation or criminal proceedings are complete.
- It is recognised that the School may have to consider an allegation against an individual not directly employed by the School, for example supply teachers provided by an employment agency or business. Gatehouse School will ensure allegations are dealt with properly. Prior to ceasing using a supply teacher due to safeguarding concerns, the facts will be found out and the LADO liaised with to determine a suitable outcome. The School may discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them, whilst the investigation is carried out. Gatehouse School may take the lead in the investigation as required in full co-operation with the LADO, police and/or children's social services. The supply teacher will be advised to contact their trade union for representation. If there is an allegation meeting it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School.

- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:
 - Substantiated: there is sufficient evidence to prove the allegation
 - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
 - False: there is sufficient evidence to disprove the allegation
 - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
 - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

15.7 Support

- The School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available.
- Support will also be offered to the pupil(s) affected and their parents/guardians. The School will consult with the children's social services, or the police as appropriate, as to how this can be done in the most appropriate and effective way.

15.8 Suspension

- Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a pupil or other pupils at the School is or are at risk of significant harm or the allegation is so serious that it might be grounds for dismissal. The School will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School will balance the need to ensure the safety and welfare of the pupil with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.
- If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.
- If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this; for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the pupil who made the allegation.

15.9 Confidentiality

- The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.

A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.

The case manager will take advice from the LADO, police and children's services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared;
- How to manage speculation, leaks and gossip, including how to make the parents/guardians of the pupil involved aware of their obligations with respect to confidentiality;
- What, if any, information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if, and when, it arises.
- Where the police are involved, wherever possible the School will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in any subsequent disciplinary process initiated by Gatehouse School.

15.10 Malicious and unsubstantiated allegations

- If an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action against the pupil in accordance with the School's Behaviour and Discipline Policy.
- If a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the School or a member of staff unreasonably.
- Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

15.11 Record keeping and references

- Details of allegations that are found to be malicious will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).
- When providing employer references, Gatehouse School will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

15.12 Dismissals and resignations

- If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children, or would have been had the person not resigned, a settlement agreement (sometimes referred to as a compromise agreement) will not be used and a report to the Disclosure and Barring Service will be made promptly and in any event within one month of the person leaving the school.
- Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the governors without delay.
- If a member of staff, contractor or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible (within one month) if the criteria for referral are met.
- If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will determine whether a referral should be made to the Teaching

Regulatory Authority (TRA). The School will follow the advice set out in the TRA documents: [Teacher misconduct: information for teachers](#) and [Teacher misconduct: the prohibition of teachers](#) (as updated from time to time) to decide whether a referral should be made.

- In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission when the Commission's guidelines deem it appropriate to do so.

Low-level concerns

As part of a whole School approach to safeguarding, Gatehouse School seeks to promote a culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately. The purpose of the School's low level concerns policy is to create and embed a culture of openness, trust and transparency in which our values and expectations of staff behaviour as set out in the Code of Conduct are constantly lived, monitored and reinforced by all staff.

A 'low-level' concern is any concern – no matter how small, and even if no more than causing a sense of unease or a nagging doubt – that an adult has acted in a way that:

- Is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the allegation threshold (see 17.2) or is otherwise not serious enough to consider a referral to the LADO.

NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE

1.1 Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include but are not limited to: being overly friendly with pupils; showing favouritism; taking photographs of pupils on a personal device; or using inappropriate sexualised, intimidating or offensive language.

1.2 Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the Head Teacher. In the case of supply staff, and contractors their employers will be notified so any patterns of inappropriate behaviour can be identified. Where the concern relates to the Head Teacher, it should be reported to the Chair of Governors. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Head Teacher/Chair of Governors when the matter has been investigated.

A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standard set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-referral to the Head Teacher as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.

Full details of how the Head Teacher will go about investigating low-level concerns are set out in an annex to the Staff Code of Conduct.

All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Head Teacher. The record will include details of the concern, the context in which the concern arose, and any actions taken and decisions reached (and the rationale for them), and the eventual outcome. The name of the individual sharing

their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by the School.

Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the School. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.

Records of low-level concerns will be reviewed at least termly by the DSL, Head Teacher and Chair of Governors to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future.

16 Arrangements for dealing with peer on peer / child-on-child abuse and allegations

16.1 Most instances of pupils causing harm to each other will be dealt with under the School's Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a pupil towards another (sometimes referred to as peer-on-peer abuse / child-on-child abuse). Examples of pupils' conduct towards each other that could raise safeguarding concerns are:

- bullying (including cyberbullying)
- physical violence such as hitting, kicking, biting etc
- sexual violence
- sexual harassment
- Upskirting (*which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or to cause humiliation or distress is now a criminal offence. Anyone of any gender can be a victim.*)
- youth produced sexual imagery (sexting)
- initiation/hazing types violence and rituals.

16.2 It is more likely that girls will be victims and boys perpetrators of peer on peer abuse. Also, peer-on-peer abuse / child-on-child abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

16.3 Pupils with Special Educational Needs or Disabilities are particularly vulnerable to peer-on-peer abuse / child-on-child abuse

Child on Child Sexual Violence and sexual harassment

16.4 Sexual violence and sexual harassment can occur between pupils of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, pupils with SEND, and LGBTQ+ pupils are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.

16.5 Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment can take a wide variety of forms:

- Sexual comments e.g. making lewd comments or sexualised remarks about a person's clothes or appearance, using sexualised names etc
- Physical behaviour e.g. deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), displaying pictures, drawings or photos of a sexual nature
- Online harassment e.g. non-consensual sharing of images and videos, unwanted sexualised comments and messages

16.6 Gatehouse School has an important role in developing pupils' understanding of what constitutes peer-on-peer abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, staff should be aware of the importance of:

- not assuming peer on peer / child on child abuse is not occurring because known cases are rare, because it may in fact be that such abuse is occurring and is simply going unreported by pupils.
- enforcing the School's rules which are explicit about the high standards of behaviour and courtesy the School expects
- implementing in a consistent way its Behaviour Policy
- being clear that sexual violence or sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing of sexual violence or sexual harassment as as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up'.
- implementing the School's anti-bullying strategy

Other strategies in place to prevent the occurrence of peer-on-peer abuse include:

- providing developmentally appropriate PHSE lessons which develop pupils' understanding of acceptable behaviour. Themes covered in these lessons that are particularly relevant to peer-on-peer abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships
- having systems in place to for any pupils to raise concerns with staff, knowing that they will be taken seriously, listened to, believed and valued
- delivering targeted work on assertiveness and keeping safe for those pupils identified as being potentially vulnerable
- having robust supervision arrangements (Refer to the School's Supervision Policy)

16.7 All staff will be trained to manage a report of peer-on-peer and child-on-child sexual violence and sexual harassment. If an allegation of peer-on-peer abuse / child-on-child abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold

criteria, the case will be referred to the local authority using the procedures set out in this policy. The School will take advice from children's social services on when and how to inform the pupil about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all pupils involved including those accused of abuse. Further details on how cases of peer-on-peer abuse will be managed is contained in Part 5 of KCSIE (September 2020).

- 16.8 A pupil against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the School's policies on behaviour and discipline will apply.
- 16.9 If it proves necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the pupil during the interview. If a pupil's parents are abroad, the pupil's education guardian will be asked to support the pupil and to accommodate him or her if they have been suspended.
- 16.10 Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other pupils at the School) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other pupils; and any relevant contextual factors. Children's social services will independently risk-assess the situation and any report produced by them will be used to inform and update the School's own risk assessment which, in any event, will be reviewed on a regular basis.

17 Other safeguarding arrangements

Gatehouse school has two designated safe spaces, the pastoral support room and the DSL office. Risk of harm can be compounded where children who are lesbian, gay, bi or trans (LGBT) lack a trusted adult with whom they can be open. The safe spaces enable these children to speak freely.

17.1 Teaching pupils to keep themselves safe

The School is committed to educating pupils about how to stay safe, based on a wide view of what may happen to pupils, not only in School but also in the wider world. These are explored in a variety of contexts, including: relationships and sex education lessons, assemblies, academic and PSHE lessons. Issues covered include:

online safety (cyber-bullying and sexting),

radicalisation,

grooming,

child sexual exploitation,

healthy and respectful relationships,

boundaries and consent,

stereotyping, prejudice and equality

body confidence and self esteem

how to recognise an abusive relationship, including coercive and controlling behaviour

age appropriate concepts of and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and female genital mutilation.

mental health,

substance misuse and bullying.

Pupils are also taught how to identify risks and how to modify their behaviour to mitigate these risks. Staff are aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation.

The safe use of technology is a focus in all areas of the curriculum and key ICT safety measures are routinely reinforced in lessons and assemblies and at pastoral events. The School has an Acceptable Use of IT policy. It manages access to the internet via 3G and 4G through the use of filters and monitoring systems to ensure IT is being used in a safe and appropriate manner.

17.2 Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe pupils day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child, immediate action should be taken by raising the issue with the DSL, who may in turn contact an appropriate external agency.

17.3 Online safety

The widespread use of digital communications technologies, such as personal mobile devices and the internet, presents young people with a host of opportunities for learning, participation, creativity and self-expression. At the same time, it has become a significant component of many safeguarding issues, including child exploitation, radicalisation and sexual predation. Issues of online safety can be broadly categorised into four areas of risk:

1. **Content:** Being exposed to illegal, inappropriate or harmful online content such as spam, pornography, fake news, substance abuse, violence, misogyny, anti-Semitism, racism, radicalisation and extremism, and lifestyle sites that promote anorexia, self-harm or suicide.
2. **Contact:** Being subjected to harmful online interaction with other users. Examples include: peer-to-peer pressure, exposure to viruses and malware, anonymous online chat sites, cyber-bullying commercial advertising, personal data or identity theft, cyber-stalking, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

3. **Conduct:** Personal online behaviour that increases the likelihood of being harmed oneself or causing harm to others. Examples include threats to: health and well-being, such as gaming or social network addiction; online disclosure of personal information and ignorance of privacy settings; online bullying; making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images); and illegal conduct, including hacking, plagiarism, and copyright infringement of digital media, such as music and film.
4. **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The School also has a range of filtering systems in place to keep pupils safe when accessing the internet whilst at the School, and usage is also monitored (see the School's E-safety Policy for further details). The effectiveness of the online filters is reviewed TERMLY by the TECHNICIAN.

The safe use of technology is a focus in all areas of the curriculum and key ICT safety measures are routinely reinforced in lessons and at pastoral events. The School has an Acceptable Use of IT policy. It manages access to the internet using filters and monitoring systems to ensure the School's network and IT equipment are being used in a safe and appropriate manner.

17.3 Mobile phones and cameras

Mobile phones should not be used when supervising or teaching children of any age except in cases of emergency. Personal mobile phones may not be used to photograph pupils. If a phone is to be used for school blogs or Twitter whilst on educational trips or visits, permission must be obtained from the Head Teacher and reference to their use and subsequent safety of data must be referred to in the trip risk assessment. Staff ensure that the school office staff have a contact number for the teachers out on trips.

Photographs and videos are taken of pupils by staff for a variety of purposes, including displays of work/activities, personal records of achievement and for the school website and newsletter. Written permission is obtained when a child joins the School and this also indicates the level of consent, including where images may be used (personal records only or personal records and on the school website or in school publications). The DSL will ensure that all staff are aware of the names of children who may not be photographed or where there is limited consent. Images of pupils on the website will not be named. Images may only be captured on school cameras and the images may only be stored on those cameras and on the School's password-protected computers. Once images have been transferred from a camera onto a computer the images should be deleted from the camera immediately. Additional copies may be stored on flash drives but these must be stored securely in a locked cupboard. Images must not under any circumstances be transmitted over the internet.

When taking photographs or recording video footage, staff should have regard to the following guidance:

- all children must be appropriately dressed
- images that only show a single child with no surrounding context should be avoided - photographs of three or four children are more likely to include the learning context
- use photographs that represent the diversity of children participating
- do not use images that are likely to cause distress, upset or embarrassment

- do not use images of a child who is considered vulnerable, unless parents/guardians have given specific written permission
- photographs must not be taken in the cloakroom/toilet areas or in the nappy-changing area

The SLT will review (at least annually), stored images and delete unwanted and out of date material.

Parents/guardians should be made aware of the need for sensitivity and respect when filming/photographing events featuring their own child or children. Staff should monitor the use of cameras at these events and ask anyone behaving inappropriately to cease filming/taking photos.

17.4 Risk assessment

Gatehouse School recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of pupils. Risk assessments may pertain to the whole school, to specific curricular or extracurricular activities that have hazards associated with them, or to individual pupils or staff. The procedures for conducting, recording and monitoring risk assessments are set out in full in the School's Risk Assessment Policy.

17.5 Safer recruitment

Gatehouse school is committed to safer recruitment processes. Members of teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff such as musicians and sports coaches are subject to the background checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE. For most appointments, an enhanced DBS check with 'barred list' information will be required. At least one member of any staff recruitment panel will have had Safer Recruitment training. The School's separate Staff Recruitment Policy contains further details about how the process of staff recruitment is conducted. Gatehouse school will conduct on-line searches as part of their due diligence on shortlisted candidates to help identify any incidents or issues in relation to the application.

17.6 Children missing education procedures

All staff are aware that children going missing, particularly repeatedly, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The School has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the Local Authority pupils who are missing from school for more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing. See the School's Children Missing in Education policy for full details.

Gatehouse School has a legal duty to inform the Local Authority if a pupil is to be removed from the roll at a non-standard transition point; i.e., where a compulsory school-aged child leaves the school before completing the school's final year. When this notification is made the following information has to be provided by the School: full name of the pupil; name, address and telephone number of the parent the pupil lives with; details of any new address for the child and parent; the name of the pupil's destination school and expected start date; and the reason why the pupil is leaving the school.

Gatehouse School is also legally required to notify the Local Authority within five days of adding a pupil's name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new pupil; specifically, their full name; sex; name and address known to be a parent of the pupil (and an indication of which parent he pupil normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone numbers at

which the parent can be contacted in an emergency*; date of birth; name and address of last school attended (if any); and details of whether they are a boarder or a day pupil.

**Note: In line with KCSIE 2021, it is the School's policy to hold a minimum of two emergency contact numbers for each pupil.*

17.7 The Prevent Duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are four specific elements to Gatehouse School's approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment – working with the Local Authority, who provide contextual information about the area, the School assesses the risk of pupils being drawn into terrorism, including extremist ideologies
- Working in partnership – liaising closely with Tower Hamlets Safeguarding Children Partnership to ensure pupils requiring support are referred at a suitably early stage
- Staff training – enabling staff to identify pupils at risk of being drawn into terrorism and to challenge extremist ideas
- IT policies – to provide guidance to pupils as to how to stay safe online (see Acceptable Use Policy) and set out the filtering and monitoring mechanisms in place.

Refer to Appendices 2 and 3 for further details on radicalisation.

17.8 Visiting speakers

Any pupil or member of staff who wishes to invite a speaker to address pupils must provide details of the individual to the SLT in order that they may carry out a vetting procedure. The event organiser or, if the organiser is a pupil, a member of the SLT, will undertake a search via the internet to research the background of the individual and consider taking up references from other schools at which they have spoken at in the past. The event organiser should also consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event will not be allowed to proceed.

It is not necessary to undertake a DBS check on every speaker. In cases where specific vetting checks are not prescribed by KCSIE, the visiting speaker will be accompanied at all times by a member of staff to ensure there is no unsupervised access to pupils. However, if a DBS check is deemed necessary, the appropriate details will be recorded in the School's Single Central Register.

17.9 Confidentiality and information sharing

The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations.

Where a pupil who is subject to a child protection plan is moving to another school, the DSL will ensure their child protection file is securely transferred to the new school as soon as possible. This file will be transferred separately from the main pupil file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the child arrives.

Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. 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. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance [Information Sharing](#) was published by the Government in July 2018. See Appendix 5

17.10 Whistleblowing

All staff are required to report to the Head Teacher any concerns about:

- poor or unsafe safeguarding practices at the School;
- potential failures by the School or its staff to properly safeguard the welfare of pupils; or
- other wrongdoing in the workplace that does not involve the safeguarding and welfare of pupils.

If the member of staff feels unable to raise their concern with the Head Teacher (or a member of SLT) or if they believe any concern has not been dealt with, they should contact the Chair of Governors. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally (see Appendix 1 for contact details). Any member of staff can whistleblow without fear of detriment (retribution or disciplinary action) provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence. Further details on whistleblowing procedures are provided in the School's Whistleblowing Policy.

17.11 School premises, security and visitors

- Gatehouse School will take all practicable steps to ensure that School premises are as secure as circumstances permit. There is CCTV in the playground, an entry system on the main entrance and access control throughout the school. There is always a member of staff on the gate morning and evening. Parents do not have access beyond the playground for drop off in the mornings and pick up after school unless they have an appointment or a query in which case they will be met by the member of staff at the reception area.
- All staff are identified by photo ID cards worn at all times during school related activities and duties. A Visitors' Book is kept at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff. All visitors will be given a name badge with the title 'Visitor', which must be clearly displayed and worn at all times whilst on the School's premises

17.12 Monitoring this Policy

- Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the School and a report to the governors. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the School's procedures.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings. In addition, the DSL will present a termly report to the governors, as part of the Head Teacher's Report.
- The governors will undertake an annual review of the policy and implementation of its procedures including good cooperation with local agencies and of the efficiency with which the related duties have

been discharged. The governors will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.

- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

17.13 Other relevant policies

The following policies should be read in conjunction with this policy:

- Anti-Bullying Policy
- Health and Safety Policy
- Educational Visits Policy
- Safer Recruitment Policy
- Code of Conduct for Staff
- Behaviour Policy
- Peer-on-Peer / child-on-child Abuse Policy
- E-Safety and Acceptable Use of ICT Policies
- Whistleblowing Policy
- Missing Pupil Policy
- Mental Health and Wellbeing Policy
- Relationships and Sex Education Policy
- Risk Assessment Policy
- supervision policy

Appendix 1: Contact details

School

Position	Name	Phone	e-mail
Designated safeguarding lead (DSL)	Fiona Tighe	07957565416	fiona.tighe@gatehouseschool.co.uk
Deputy DSL (responsibility for EYFS)	Aileen Reidy	07941226306	aileen.reidy@gatehouseschool.co.uk
Deputy DSL	Jenni Veitch	07543661015	jenni.veitch@gatehouseschool.co.uk
Head	Sevda Korbay	07949384148	head@gatehouseschool.co.uk
Chair of governors	Ian Duncan	07836714742	chair@gatehouseschool.co.uk
Nominated safeguarding governor	Joanna Scott	07971629549	joannascott2000@gmail.com

Local Authority children's social services numbers

Name	Phone	Out of hours phone	
Multi-Agency Safeguarding HUB (MASH)	020 7364 3444/5601 / 5606	020 7364 5006	MASH@towerhamlets.gov.uk
Police Child Abuse Investigation Team (CAIT)	020 8217 6484	In an emergency, contact the Police 999	
Early Help Hub	020 7364 5006		earlyhelp@towerhamlets.gov.uk

Safeguarding and Child Protection Training, Consultation and Advice:

Title	Name	Phone	e-mail
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Education Safeguarding Quality Assurance & Training Officer Tower Hamlets.	Dr Chris Jordan	02073643437 work mobile 07562431829	chrisjordan@towerhamlets. gov.uk
Education Safeguarding Officer Tower Hamlets.	Mohammed Ali	02073643524	Mohammed. Ali@towerhamlets.gov.uk

Allegations against staff

Title	Name	Phone	e-mail
Local authority's designated officer (LADO)	Melanie Benzie	02073640677	LADO@towerhamlets.gov.uk

Extremism

Title	Name	Phone	e-mail
Local Authority Prevent Lead for Tower Hamlets	Jake Butterworth	020 7364 3009	Mash@towerehamlets.gov.uk
DfE non-emergency advice			counter-extremism@education. gsi.gov.uk
Police	Non-eme rgency number	101	

Female genital mutilation (FGM)

Title	Name	Phone	e-mail
LSCP Lead for FGM		020 7641 1610	
Project Azure		02071612888	
Metropolitan Police		999	

		112 from mobile	
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Other useful contact details

Name	Phone
Childline	0800 1111
NSPCC	0808 800 5000
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Child exploitation Online Prevent (CEOP)	0870 000 3344

Appendix 2: Other types of abuse

- **Children missing from education:** all children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child going missing from education is a potential indicator of abuse or neglect, including possible sexual abuse, sexual exploitation or radicalisation. The School will report to the Local Authority instances of prolonged unauthorised absence or a pupil being removed from the School roll under the circumstances outlined in KCSIE. In cases where a pupil has a prolonged period of authorised absence for a reason such as long-term illness, the School will be proactive in terms of providing support to both the parents and the pupil.
- **Child sexual exploitation (CSE):** CSE occurs where an individual or group takes advantage of an imbalance of power* to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants (for example, food, drugs, alcohol money or affection) 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. CSE does not always involve physical contact; it can also occur through the use of technology. 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. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity 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).
- **Child criminal exploitation (CCE):** CCE is where 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 being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten young people.

**An imbalance of power is commonly associated with age difference, it can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic and other resources*

- **County lines:** 'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of 'deal line'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) 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, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), where the victim may have

been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

- **Children and the court system:** Children are sometimes required to give evidence either as witnesses in the criminal courts or as part of family court procedure. This can be stressful and may reflect existing conflict and difficulties in the family. Staff members should be aware that any child who is involved in the court process may be at risk of a particular safeguarding issue. The Ministry of Justice has produced age appropriate guides for children who may have to give evidence in the criminal courts.
- **Children with family members in prison:** Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders provides information designed to support professionals working with offenders and their children to help mitigate the negative consequences for those children.
- **Cybercrime.** Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:
 - unauthorised access to computers (illegal 'hacking');
 - denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
 - making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.
- Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a Deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- **Domestic abuse:** The cross-government definition of domestic abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial and emotional. 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. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are also victims. Witnessing domestic abuse can have a lasting impact on children. Children can be victims in their own relationships too.

- **Familial harm:** Extra support for siblings may be needed following incidents.
- **Extra Familiar Harms:** All staff, but especially the designated safeguarding lead and deputies should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including but not limited to sexual abuse including harassment and exploitation, domestic abuse in their own intimate relationships, criminal exploitation, serious youth violence, county lines and radicalisation.
- **Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.
- **Homelessness:** Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL and deputies are aware of contact details and referral routes into the Local Housing Authority so that they can raise /progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour as well as the family being asked to leave a property. In most cases college staff will be considering homelessness in the context of children who live with their families and intervention will be on that basis. However, it should be recognised that some 16 and 17 year olds may be living independently for example, having been excluded from the family home and will require a different level of intervention and support. Children's services will be the lead agency for those young people and the DSL or deputy should ensure appropriate referrals are made based on the pupil's circumstances.
- **Honour-based abuse (HBA):** So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed supposedly to protect or defend the honour of the family and/or community, including FGM (see below) 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 HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.
- **Female Genital Mutilation (FGM).** FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

All staff must be aware of the law requiring teachers to report cases 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 aged under 18. The duty to report resides with the teacher who becomes aware of the case, not the DSL, although the DSL should be informed unless the teacher has a good reason for not doing so. The report should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.

- **Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent is where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.
- **Modern slavery:** Modern slavery encompasses human trafficking and slavery, servitude, forced or compulsory labour. Exploitation can take many forms, including, sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. The modern slavery statutory guidance provides more information on how to identify and support victims.
- **Radicalisation and extremism:** 'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 'Extremism' is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Extremist views may result in terrorist activity which is where an action, or actions, endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts electronic systems. The use of threat of terrorist activity must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There are various reasons why a young person might become interested in extremism:

- a search for answers to questions about identity, faith and belonging
- a desire for 'adventure' and excitement
- a desire to enhance self-esteem of the individual and promote 'street cred'
- the discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer identity, social network and support
- a sense of grievance that can be triggered by personal experiences of racism or discrimination

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism and this is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL.

On the basis of this information the DSL may conclude that a referral to the Channel Programme is appropriate. The Channel programme is run in every local authority and addresses all kinds of extremism including the extreme-right and Islamist-related. The support provided could include assistance with education or

employment, and ideological mentoring to provide vulnerable individuals with skills to protect themselves from being drawn into extremism. An individual's engagement with the programme is entirely voluntary at all stages.

- **Serious violence:** All staff should be 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 and may be at risk of criminal exploitation.
- **Youth produced sexual imagery:** While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives, there are risks associated with the production and distribution of sexual and explicit images. both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible impact on a child's well-being if images are shared more widely than they originally intended.

Creating and sharing sexual photos and videos of under-18s is illegal. The DSL should be notified as soon as possible if an incident comes to light in which a pupil under the age of 18:

- has created and shared sexual imagery of themselves with a peer under the age of 18;
- has shared sexual imagery created by another person under the age of 18 with another person; or
- is in possession of sexual imagery created by another person under the age of 18.

Staff **must not** ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. You should not view youth-produced sexual imagery unless there is good and clear reason to do so. Along with our own Safeguarding and Child Protection procedures, the school will follow the advice given in *Sexting in schools and colleges: Responding to incidents and safeguarding young people*, 2016.

A decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and, if appropriate, local network of support.

Appendix 3: Further information on signs of abuse

Physical abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Unexplained bruises and welts on the face, throat, arms buttocks thighs or lower back in unusual patterns or shapes which suggests the use of an instrument• Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks• Scald marks –immersion burns produce ‘stocking’ or ‘glove’ marks on feet and hands or upward splash marks which may suggest hot water has been thrown over a child• Human bite marks• Broken bones	<ul style="list-style-type: none">• Behavioural extremes (withdrawal, aggression or depression)• Unbelievable or inconsistent explanations of injuries• Fear of parents being contacted• Flinching when approached or touched• Truancy or running away from home

Emotional abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Eating disorders, including obesity or anorexia• Speech disorders (stammering)• Nervous disorders (rashes, hives, facial tics, stomach aches)	<ul style="list-style-type: none">• Fear of parent being approached• Fear of making mistakes• Developmental delay in terms of emotional progress• Cruel behaviour towards children, adults or animals• Self-harm• Behavioural extremes, such as overly compliant-demanding, withdrawn-aggressive, listless-excitabile

Sexual abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Torn, stained or bloody underclothes• Pain or itching in genital area• Bruises or bleeding near genital area or anus• Sexually transmitted infections• Pregnancy• Discomfort when walking or sitting down	<ul style="list-style-type: none">• Self-harm• Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level• Sudden or unexplained changes in behaviour• Avoidance of undressing or wearing extra layers of clothing

	<ul style="list-style-type: none"> • Truancy • Regressive behaviours (bed-wetting or fear of dark)
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Neglect

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Height and weight significantly below age level • Poor hygiene (lice, body odour etc) • Inappropriate clothing for weather conditions • Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) • Constant hunger, sometimes stealing food from others 	<ul style="list-style-type: none"> • Erratic attendance at school • Chronic hunger or tiredness • Having few friends • Assuming adult responsibilities

Child sexual exploitation

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Tiredness or mood swings • Bruising • Sexually transmitted diseases • Pregnancy 	<ul style="list-style-type: none"> • Sudden decline in school performance, punctuality, attendance • In possession of expensive goods • Going to place they cannot afford • Age-inappropriate clothing • Inappropriate sexualised behaviour • Secretive • Mixing with older people • Misuse of drugs and alcohol

Child criminal exploitation and county lines

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • See sections on physical and sexual abuse • Carrying weapons 	<ul style="list-style-type: none"> • Self-harming • Persistently going missing from school or home and/or being found out of area • Unexplained acquisition of money, clothes or mobile phones • Excessive receipt of texts/phone calls and/or having multiple handsets • Relationships with controlling older individuals or groups

	<ul style="list-style-type: none">• Significant decline in school performance• Gang association or isolation from peers or social networks
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Female genital mutilation

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Difficulty walking, sitting or standing • Bladder or menstrual problems • Severe pain and bleeding • Infections such as tetanus, HIV and hepatitis B and C 	<ul style="list-style-type: none"> • Abroad for a prolonged period • Unusual behaviour after a period of absence • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations

Forced marriage

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Cut or shaved hair as a form of punishment for being disobedient 	<ul style="list-style-type: none"> • Absence from School • Failure to return from visit to country of origin • Self-harm or attempted suicide • Running away from home • Early marriage of siblings • Sudden announcement of engagement to a stranger • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations

Grooming

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • See section on sexual abuse 	<ul style="list-style-type: none"> • Spending increasingly prolonged time online • Having older boyfriends or girlfriends • Secretiveness about who they are talking to online and what sites they visit • Possession of electronic devices such as mobile phones or webcams that parents have not provided • Engaging less with their usual friends • Using sexual language that you would not expect them to know • Going to unusual places to meet people

	<ul style="list-style-type: none"> • Using drugs and/or alcohol • Going missing from home or school
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Radicalisation

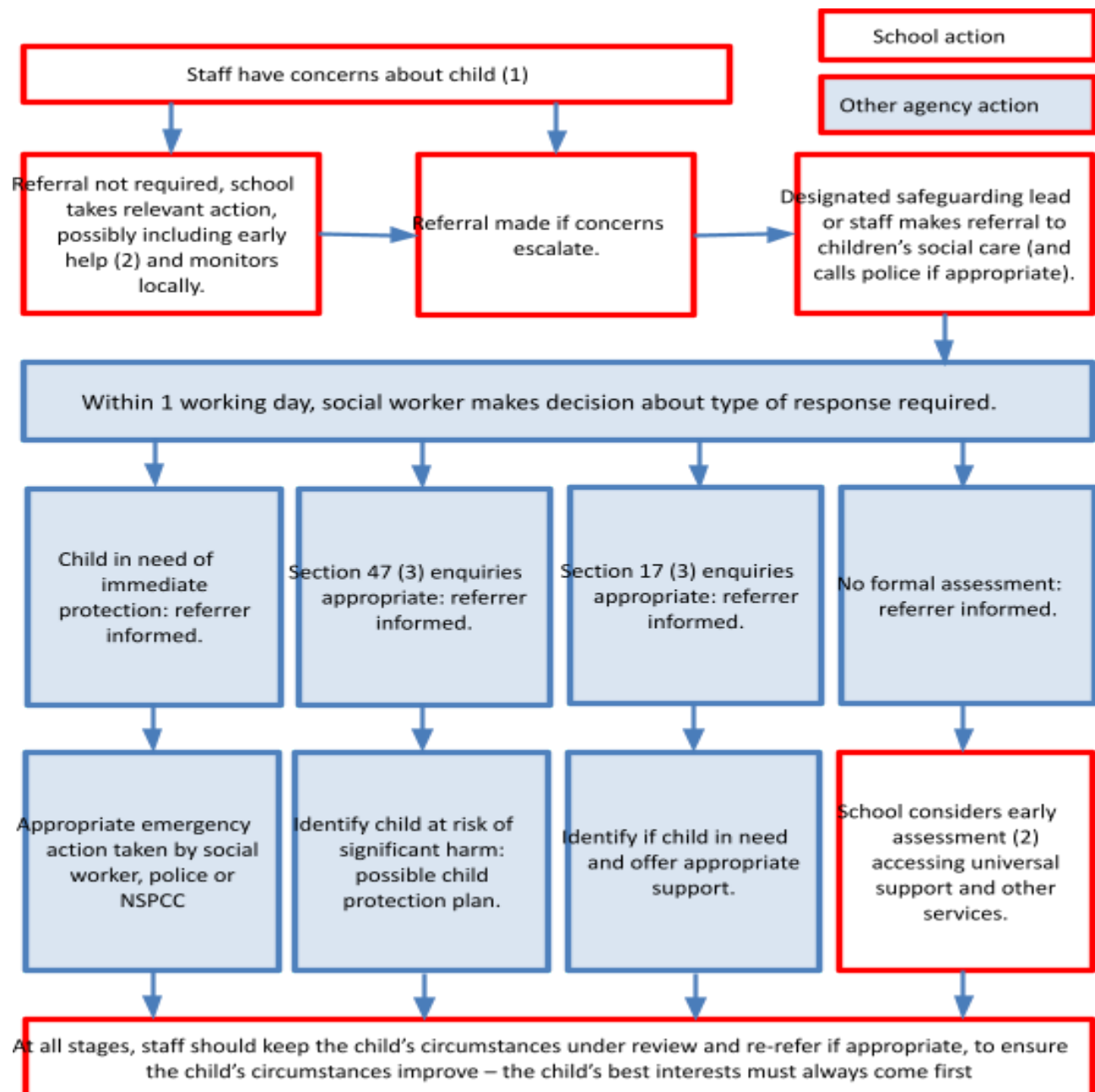
Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Out of character changes in dress, behaviour and peer relationships 	<ul style="list-style-type: none"> • Showing sympathy for extremist causes • Glorifying violence • Evidence of possessing illegal or extremist literature • A sudden disrespectful attitude towards others • Increased secretiveness, especially in relation to internet use • Unwillingness or inability to discuss their views • Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-prescribed extremist groups such as the English Defence League

Broad government guidance on the following is also available via the GOV.UK website (see Part one: Keeping children safe in education September 2020)

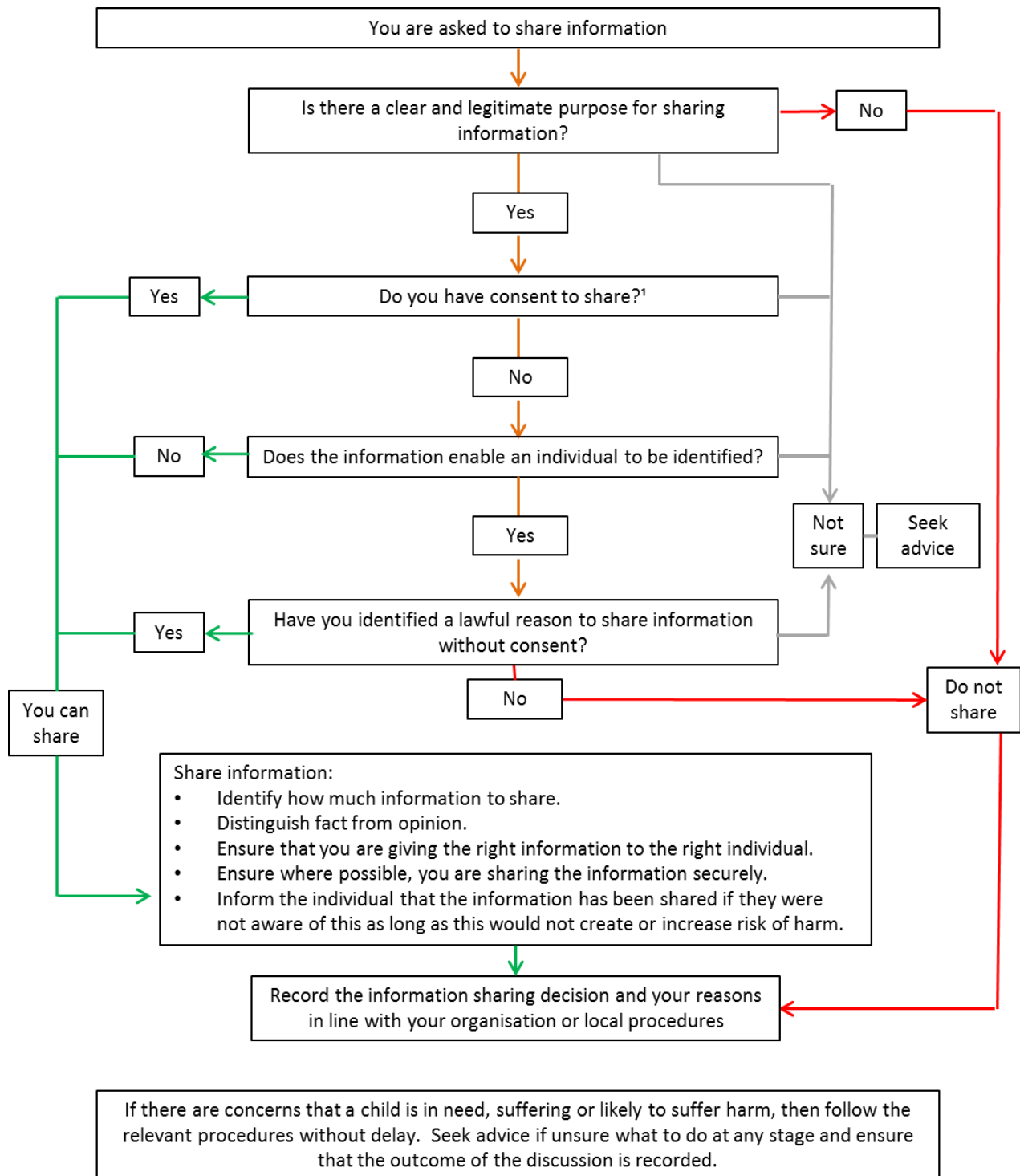
- [bullying including cyberbullying](#)
- [children missing education](#)
- [child missing from home or care](#)
- [child sexual exploitation](#)
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [hate](#)
- [mental health](#)
- [missing children and adults](#)
- [private fostering](#)

- [preventing radicalisation](#)
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)

Appendix 4: Actions where there are concerns about a child (KCSIE, September 2021)



Appendix 5: Flowchart of when and how to share information



Appendix 7: DSL/DDSL job description

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment

Summary of the role	<ul style="list-style-type: none"> • To take lead responsibility for safeguarding and child protection (including online safety) occurring at the School and to support all other staff in dealing with any child welfare and child protection concerns that arise. • To have the status and authority within the School to carry out the duties of the post including committing resources, and where appropriate, supporting and directing other staff to safeguard and promote the welfare of pupils. • Whilst the activities of DSL can be delegated to appropriately trained deputies (DDSLs), the ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated. • To take part in strategy discussions and inter-agency meetings and to support other staff to do so, and to contribute to the assessment of pupils. • To promote and safeguard the welfare of pupils in the School.
Main duties and responsibilities	Further specifics:
Managing referrals	<p>You are expected to:</p> <ul style="list-style-type: none"> • refer cases of suspected abuse of any pupil at the School to the local authority children's social care; • support staff who make referrals to local authority children's social care; • refer cases to the Channel programme where there is a radicalisation concern; • support staff who make referrals to the Channel programme; • refer cases where a person is dismissed or left due to risk/harm to a child to Disclosure and Barring Service (DBS); and • refer cases where a crime has been committed to the Police.
Work with others	<p>You are expected to:</p> <ul style="list-style-type: none"> • act as a point of contact with the three safeguarding partners: the local authority (Tower Hamlets); the clinical commissioning group; and the police; • liaise with the Head to inform her of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; • as required, liaise with the "case manager" (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child protection concerns in cases which concern a staff member; • liaise with staff (especially pastoral support staff, IT staff, First Aiders, and the named persons with oversight for SEND) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and • to act as a source of support, advice and expertise for all staff.
Training	You are expected to ensure your child protection training and that of the DDSLs is sufficient and appropriate to provide the knowledge and skills required to carry out

	<p>this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training.</p> <p>In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role in order to:</p> <ul style="list-style-type: none"> • understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements; • have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so; • ensure each member of staff has access to, and understands, the School or School's child protection policy and procedures, especially new and part-time staff; • be alert to the specific needs of children in need, those with special educational needs and young carers; • understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; • understand the importance of information sharing, both within the School, and with the three safeguarding partners, other agencies, organisations and practitioners; • be able to keep detailed, accurate, secure written records of concerns and referrals; • understand and support the School with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation; • be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School; • be able to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online; • obtain access to resources and attend any relevant or refresher training courses; and • encourage a culture of listening to pupils and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.
Raising awareness	<p>You are expected to:</p> <ul style="list-style-type: none"> • ensure that the School's child protection policies are known, understood and used appropriately; • ensure the School's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board regarding this,

	<ul style="list-style-type: none"> • ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; • link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and • help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that pupils, including pupils with a social worker, are experiencing, or have experienced, with teachers and School leadership staff. The role could include: <ul style="list-style-type: none"> ○ ensuring that the School, and their staff, know who these pupils are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; and ○ supporting teaching staff to identify the challenges that pupils in this group might face and the additional academic support and adjustments that they could make to best support these pupils.
Child protection files	<p>You are expected to:</p> <ul style="list-style-type: none"> • ensure that when a pupil leaves the School their child protection file is transferred to the new school as soon as possible; • ensure child protection files are transferred separately from the pupil's main file in a secure manner and confirmation of receipt is received from the destination school; • consider whether it is appropriate to share any information with the new school in advance of the pupil leaving
Availability	<p>You are expected to:</p> <ul style="list-style-type: none"> • ensure during term time either the Designated Safeguarding Lead (or a deputy) will always be available during the school day or out of school hours in an emergency staff can contact DSL or if I am unavailable a member of the safeguarding team on their mobiles to discuss any safeguarding concerns; and • Arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

