



GATEHOUSE
SCHOOL

Safeguarding and Child Protection Policy

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Gatehouse School is committed to robust safer recruitment practices to ensure the safety and welfare of children. In line with the Department for Education's statutory guidance, Keeping Children Safe in Education (KCSIE) 2026, the following procedures are implemented:.....	
• Enhanced DBS Checks: All staff, including part-time, temporary, and supply staff and visiting personnel such as musicians and sports coaches, undergo the appropriate level of Disclosure and Barring Service (DBS) check for their role. Staff whose roles constitute regulated activity with children must have an enhanced DBS check with children's barred list information, as required by safeguarding legislation and applicable statutory guidance.....	104
• Safer Recruitment Training: At least one member of every recruitment panel has received accredited safer recruitment training, ensuring informed decision-making during the hiring process.....	104
• Online Searches: As part of due diligence, the school conducts online searches of shortlisted candidates. This practice, recommended by KCSIE 2026, helps identify any publicly available information that may raise safeguarding concerns. The process is carried out consistently and fairly, with candidates informed in advance about the possibility of such searches NASUWT.....	104
• Single Central Record (SCR): The school maintains an up-to-date SCR that documents all pre-employment checks for staff, including DBS checks, identity verification, and eligibility to work in the UK. This record is regularly reviewed and is available for inspection by regulatory bodies. The SCR also records the relevant checks undertaken for governors, trustees and other individuals where required by KCSIE 2026.....	104
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• Agency and Supply Staff: When engaging agency or supply staff, the school obtains written confirmation that all required checks have been completed. The school retains the right to view the original DBS certificates and verify identity upon arrival.....	104
• Volunteers and Regulated Activity: From 1 September 2026, the previous supervision exemption for regulated activity with children is removed. Accordingly, a volunteer who teaches, trains, instructs, cares for or supervises children may be undertaking regulated activity even where they are supervised by a member of staff, where the relevant frequency or period conditions are met. This includes activity undertaken frequently or on more than three days in 30 days, or activity undertaken overnight. Volunteers undertaking regulated activity must have an enhanced DBS check, including children's barred list information, before undertaking such activity.....	105
• Volunteers Not in Regulated Activity: Volunteers whose activities do not constitute regulated activity will be subject to a written risk assessment to determine what checks, if any, are appropriate. Depending on the nature of the role and level of access to children, the school may require an enhanced DBS check without barred list information or a basic DBS check. A volunteer who has not undergone appropriate checks must not be left unsupervised with children or permitted to	

undertake regulated activity.....	105
• Occasional Volunteers: The school will distinguish between volunteers undertaking regulated activity and those providing occasional assistance. Parents, carers and other volunteers undertaking occasional activities that do not meet the regulated activity criteria will not ordinarily require an enhanced DBS check with children's barred list information, although the school may require an appropriate DBS check following a risk assessment.....	105
• Supervision Arrangements: The school will no longer rely on supervision alone to determine that a volunteer is outside regulated activity where the relevant regulated activity and frequency or period conditions are met. Volunteer roles will therefore be reviewed to determine whether they fall within regulated activity under the KCSIE 2026 and the amended legal definition.....	105
• Safer Recruitment Policy: The school's Staff Recruitment Policy outlines the procedures and responsibilities related to recruitment and selection, ensuring compliance with safeguarding requirements, and will be reviewed to reflect changes to regulated activity, volunteer checks and DBS requirements introduced for KCSIE 2026.....	105
By adhering to these practices, Gatehouse School demonstrates its commitment to safeguarding children and ensuring that all individuals employed or volunteering within the school are suitable to work with children. The school will keep volunteer roles under review and ensure that any individual undertaking regulated activity with children has the appropriate enhanced DBS check, including children's barred list information, before undertaking that activity.....	105
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0. Document Control

The table below contains the changes made between the different final editions of this document set for approval. This is to help provide information to those reviewing and approving the document of the changes being made.

Document Edition	Section	Details of change
September 2025	All Sections	Full policy review, formatting. Updates from KCSIE 2025 and EYFS Statutory Framework 2025.
September 2026	30. Online Safety to expand on AI guidance	Updates from KCSIE 2026

1. Safeguarding Statement

Gatehouse School is committed to safeguarding and promoting the welfare of all children and staff, ensuring everyone is safe, treated with dignity and respect, and free from discrimination.

This Safeguarding and Child Protection Policy, which outlines procedures to protect children from harm, support their health and development, and enable them to achieve the best outcomes, is accessible to all staff, parents/carers, volunteers, visitors, and governors via the school website, staff handbook and induction packs, and parent packs, and on request in alternative formats, and is reinforced through training and line management.

The policy and other linked safeguarding policies are reviewed at least annually, or sooner if new legislation, guidance, or an incident requires immediate revision. All procedures apply to staff, volunteers, visitors, and governors and are written in accordance with *Keeping Children Safe in Education 2026*, reflecting local safeguarding arrangements, including the Tower Hamlets Safeguarding Children Partnership supplementary guidance on Child Protection Procedures and the Management of Allegations and Concerns that do not meet the Harm Threshold.

2. Core Safeguarding Principals

Gatehouse School is fully committed to safeguarding and promoting the welfare and wellbeing of all children and staff. The following core principles underpin all aspects of our safeguarding policies, procedures, and practices:

- The welfare of the child is paramount and underpins all discussions, decision-making, and actions at the school.
- All concerns raised or reported by children will be taken seriously.
- Every child has the right to live free from harm and discrimination, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, including within digital and online environments.
- The child's wishes and feelings will always be considered when determining action and support.
- All staff, including supply staff, contractors, and volunteers, share equal responsibility to act immediately on any concern or suspicion that a child may be at risk of harm.
- The Designated Safeguarding Lead will ensure that pupils and staff involved in safeguarding and child protection issues receive appropriate support.

These six principles are embedded throughout the school's safeguarding arrangements, underpinning a whole-school approach to safeguarding for all pupils, including those in the Early Years Foundation Stage. All procedures are aligned with *Keeping Children Safe in Education 2025* and reflect local safeguarding arrangements, including the Tower Hamlets Safeguarding Children Partnership guidance.

3. Purpose and Principles of Policy

Gatehouse School is committed to ensuring that all pupils on roll, including those in alternative provision, are effectively safeguarded.

This policy ensures that all pupils are protected from harm, that staff understand their safeguarding responsibilities, and that consistent best practice is maintained across the school. It demonstrates the school's commitment to safeguarding the whole community – pupils, parents/carers, staff, governors, and external partners.

All staff, governors, and volunteers share this commitment by creating a safe, inclusive and respectful environment and a strong pastoral culture. Pupils who have experienced or witnessed abuse are encouraged to report concerns without fear or shame and are provided with appropriate support. Staff are trained to listen carefully, identify concerns early, and act in the best interests of the child by following agreed safeguarding procedures.

Gatehouse School recognises that some children may be questioning their sexual orientation or gender identity and that these children may experience particular safeguarding risks, including bullying, discrimination, harassment, abuse, mental health difficulties, social isolation or pressure from peers or others. The school will respond sensitively to individual circumstances and will not make assumptions about a child based on their sexual orientation, gender identity or gender expression.

Where a child is questioning their gender, the school will consider the child's individual circumstances, wellbeing and safeguarding needs and act in accordance with KCSIE 2026 and the school's legal duties. Any request relating to social transition will be considered carefully, with the child's best interests, safeguarding, parental/carer involvement and any relevant clinical advice taken into account.

3.1 Safe Spaces

Gatehouse School provides a designated safe space – the **Pastoral Support Room** – where pupils can speak confidentially with trusted adults. This space is inclusive and welcoming to all pupils, including those who identify lesbian, gay or bisexual (LGB), or who are questioning their sexual orientation or gender.

The school recognises that children who are LGB or questioning their gender may be particularly vulnerable to bullying, discrimination, harassment or abuse. Staff will take any such concerns seriously and will respond in accordance with the school's safeguarding and anti-bullying procedures.

3.2 Teaching Pupils to Keep Themselves Safe

The school is committed to teaching pupils about personal safety in both physical and digital environments through **PSHE, assemblies, and curriculum lessons**. Teaching is **age-appropriate** and helps pupils:

- Recognise safe and unsafe situations online and offline.

- Understand risks, including exploitation, harmful content, or unsafe behaviour.
- Know how and when to seek help from trusted adults.
- Develop respect, tolerance, and awareness of diversity.
- Build confidence to make safe choices and take responsibility for their own safety.
- Understand respectful relationships and recognise bullying, harassment, discrimination, coercion and abuse.
- Understand that harmful behaviour towards a person because of their sexual orientation, gender identity or perceived gender identity is unacceptable.

Lessons focus on practical, age-appropriate guidance:

- **Online safety** – sharing personal information, recognising unsafe content, reporting concerns.
- **Exploitation** – safe touch, safe adults, speaking up, consent.
- **Radicalisation** – tolerance, diversity, seeking help if something feels unsafe
- **Healthy relationships** – respect, personal boundaries, recognising controlling or harmful behaviour, and knowing where to seek support.

The school will ensure that teaching does not reinforce rigid or harmful gender stereotypes and will provide age-appropriate opportunities for pupils to develop respectful attitudes towards others.

This approach equips pupils with the knowledge and skills to stay safe and make responsible decisions.

3.3 Safe Use of Technology

The school promotes the safe and responsible use of technology. Online safety is reinforced through the curriculum and pastoral activities. Internet access is filtered and monitored, and all users are required to follow the **Acceptable Use of IT Policy**.

The school recognises that children who are LGB or questioning their gender may experience online bullying, harassment, unwanted disclosure of personal information, sexual exploitation or exposure to harmful content. Online safeguarding concerns will be managed in accordance with the school's safeguarding and online safety procedures.

3.4 Preventative and Protective Measures

Gatehouse School:

- Implements safer recruitment procedures for all staff, governors, and volunteers;
- Ensures all external professionals and third-party staff undergo appropriate safeguarding checks;
- Works collaboratively with other agencies and follows inter-agency safeguarding procedures;
- Supports early intervention and multi-agency approaches such as CAF and TAC;
- Monitors and supports pupils with physical or mental health needs;

- Is alert to all forms of abuse, including extra-familial harm, exploitation, serious youth violence, county lines, and radicalisation;
- Follows child protection plans and ensures support for children who have experienced abuse;
- Maintains robust health and safety, behaviour, and substance misuse policies;
- Acts swiftly to address any deficiencies in safeguarding procedures; and
- Takes all complaints or suspicions of abuse seriously and responds in line with this policy.
- Takes particular care to identify and respond to safeguarding concerns affecting children who are LGB or questioning their gender, including bullying, discrimination, harassment, abuse, exploitation, mental health concerns and social isolation.
- Ensures that any decisions relating to a child questioning their gender are considered on an individual basis, with appropriate regard to the child's wellbeing, safeguarding needs, best interests, parental/carer involvement and any relevant clinical advice.
- Ensures that staff do not initiate social transition for a child and that any request for support with social transition is considered in accordance with KCSIE 2026, the school's safeguarding duties and applicable equality and human rights obligations.

These measures ensure that all pupils, including those in the **Early Years Foundation Stage (EYFS)**, are safeguarded effectively, in accordance with *Keeping Children Safe in Education 2025* and the **Tower Hamlets Safeguarding Children Partnership** guidance.

4. Safeguarding Legislation and Guidance

This policy is written in accordance with all relevant legislation and statutory guidance that governs the safeguarding and protection of children in independent schools.

Gatehouse School follows the **inter-agency procedures** of the **Tower Hamlets Safeguarding Children Partnership (THSCP)**. The Designated Safeguarding Lead (DSL) regularly consults with the **Tower Hamlets Education Safeguarding Officer** on safeguarding matters. (Full contact details are provided in *Appendix 2*.)

4.1 Relevant Legislation and Statutory Guidance

- **Section 157, Education Act 2002** – duties of proprietors of independent schools to safeguard and promote the welfare of pupils.
- **The Education (Independent School Standards) Regulations 2014** – Part 3, Welfare, health and safety of pupils.
- **The Apprenticeships, Skills, Children and Learning Act 2009** (as amended).
- **Education and Training (Welfare of Children) Act 2021** (16–19 Academies and Independent Training Providers).
- **Human Rights Act 1998**.
- **The Equality Act 2010**.
- **Data Protection Act 2018** and the **UK General Data Protection Regulation (UK GDPR)**.

- **The Data (Use and Access) Act 2025**, which amends the UK data protection and information-sharing framework and includes provisions relevant to the lawful use and sharing of information.
- **The Safeguarding Vulnerable Groups Act 2006**.
- **Working Together to Safeguard Children (2023)** – HM Government (updated Feb 2024).
- **Keeping Children Safe in Education (2026)** – Department for Education.
- **Information Sharing: Advice for Practitioners (2024)** – Department for Education.
- **What to Do If You're Worried a Child Is Being Abused (2015)** – Department for Education.
- **Early Years Foundation Stage Statutory Framework (2024)**.
- **The Equality Act 2010 and Schools: Department Advice (May 2014)**.
- **The Teacher Standards (2012)**.

Gatehouse School will share safeguarding information lawfully, fairly and proportionately, in accordance with the Data Protection Act 2018, UK GDPR, the Data (Use and Access) Act 2025, and relevant Department for Education information-sharing guidance. Safeguarding concerns will not be withheld solely because consent has not been obtained where there is a lawful basis for sharing the information.

4.2 Multi-Agency Safeguarding Arrangements

Safeguarding arrangements are coordinated by the **three statutory safeguarding partners**:

1. the **Local Authority**,
2. the **Integrated Care Board (ICB)**, and
3. the **Police**.

Together, they form the **Local Safeguarding Children Partnership (LSCP)**, which replaces the former Local Safeguarding Children Board (LSCB). These partners hold **joint accountability** for ensuring effective safeguarding and promoting the welfare of children, in line with *KCSIE 2026* and *Working Together to Safeguard Children 2023*.

5. Pan-London and Tower Hamlets Safeguarding Children Partnership Guidance

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

- London Child Protection Procedures, 7th Edition (London Safeguarding Children Board, 31st March 2025)
- Tower Hamlets Safeguarding Children Partnership Levels of Need Guidance (September 2023)
- THSCP Supplementary Guidance for Schools and Education Settings on Child Protection Procedures (September 2025)

- THSCP LADO Procedures and Flowchart regarding allegations made against staff working in the children's workforce – reporting and managing allegations
- THSCP Supplementary Guidance for Schools on Managing Allegations of Abuse against Staff and Concerns that do not meet the Harm Threshold (September 2025)
- THSCP Multi-Agency Escalation and Resolution Policy

All guidance is implemented in line with KCSIE 2026, which strengthens the statutory duty of schools and local safeguarding partners to safeguard children, ensure early help, and provide a coordinated response to child protection concerns. Staff are expected to follow these local procedures and statutory guidance to ensure consistency and compliance in safeguarding practice.

6. Tower Hamlets Safeguarding Children Partnership (THSCP)

The Children Act 2004, as amended by the Children and Social Work Act 2017, established the Tower Hamlets Safeguarding Children Partnership (THSCP). The Partnership coordinates the work of all agencies to safeguard and promote the welfare of local children and ensure the best outcomes. The three statutory safeguarding partners have published arrangements to identify and respond to children's needs. More information can be found on the THSCP website.

In line with Working Together to Safeguard Children 2023, Gatehouse School acts as a protective factor for all pupils, particularly the most vulnerable, and plays a pivotal role in local multi-agency safeguarding arrangements. As a 'relevant agency', the school has a statutory duty to cooperate with THSCP, including responding to safeguarding audits and providing key information about children.

The school is committed to:

- Engaging with THSCP multi-agency safeguarding training and the Designated Safeguarding Leads Forums;
- Participating in THSCP/LA Section 175/157 School Safeguarding Audit Cycles;
- Contributing to Rapid Reviews and Child Safeguarding Practice Reviews; and
- Supporting the agreed safeguarding priority areas for 2025–2027, specifically Think Family and Adolescent Safeguarding.

6.1 Local Authority Strategy

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

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

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet children's needs as soon as problems emerge.
- Protecting children from maltreatment, whether within or outside the home, including **online environments**.
- Preventing impairment of a child's physical or mental health or development.
- Ensuring children grow up in safe and effective care.
- Taking action to enable all children to achieve the best possible outcomes.

This definition includes **protecting children from online abuse, child on child abuse, and risks associated with emerging technologies**, as outlined in *Keeping Children Safe in Education (2025)*.

Child protection refers to the specific processes undertaken to safeguard children who have been identified as suffering, or being at risk of suffering, significant harm.

Child includes everyone under the age of 18.

Parent refers to birth parents and any other adults in a parenting role, including step-parents, carers, foster carers, and adoptive parents.

Staff refers to all individuals who work for, or on behalf of, the school — whether full-time or part-time, temporary or permanent, paid or voluntary.

8. Roles and Responsibilities

8.1 Governing Body

The Governing Body, Trustees, or Proprietor hold strategic leadership responsibility for safeguarding arrangements at the school. They must have due regard to all relevant statutory guidance, including *Keeping Children Safe in Education (2026)*, ensuring that safeguarding policies and procedures are:

- compliant with statutory requirements,
- reflective of local safeguarding arrangements, and
- effective in practice.

The Governing Body ensures that appropriate safeguarding policies are reviewed annually and that all staff, including volunteers, understand their responsibilities.

Our **Safeguarding Link Governor, Emmanuelle Whale**, takes specific leadership responsibility for monitoring and evaluating the effectiveness of safeguarding arrangements. This includes:

- liaising regularly with the DSL and Headteacher;
- monitoring the implementation of safeguarding policies;
- ensuring that emerging risks, online trends, and peer-on-peer abuse cases are considered as part of the annual review; and
- providing a safeguarding report to the full Governing Body at least termly.

8.2 Headteacher

The Headteacher ensures that the **Child Protection Policy** and other safeguarding policies are communicated, understood, and implemented consistently by all staff. The Headteacher ensures that:

- adequate time, training, funding, and resources are allocated to enable the DSL and deputies to fulfil their roles effectively;
- emerging safeguarding risks—including online threats, harmful sexual behaviour, and mental health concerns—are reviewed and addressed through staff training;
- safer recruitment procedures are implemented in accordance with Part 3 of *KCSIE 2026*; and
- pupils are provided with opportunities to learn about safeguarding, including online safety, through the curriculum and wider school life.

8.3 Designated Safeguarding Lead (DSL)

The **DSL** holds overall day-to-day responsibility for safeguarding arrangements, including online safety and oversight of filtering and monitoring systems - see role description in Appendix 7.

Key responsibilities include:

- **Managing referrals** of suspected abuse, neglect, radicalisation, harmful sexual behaviour, or other safeguarding concerns to appropriate agencies (Local Authority, Police, DBS, Channel).
- **Working with others**, coordinating internal and external safeguarding activity, promoting supportive relationships with parents/carers, and guiding staff in supporting children at risk.
- **Information management**, ensuring child protection files are accurate, up to date, securely stored, and transferred promptly when pupils move schools.

- **Raising awareness**, reviewing and updating safeguarding policies annually, delivering staff training, and ensuring that parents understand the school's safeguarding and referral procedures.

Training, Knowledge, and Skills:

The DSL receives regular updates to remain confident in managing risks related to peer-on-peer abuse, harmful sexual behaviour, radicalisation, mental health, and emerging online threats. The DSL works collaboratively with agencies such as the LADO, Police, Channel Programme, Social Care, and local mental health services.

Transitions and Record Keeping

The DSL ensures continuity of safeguarding support during all transition points, including in-year and non-standard transfers. Child protection files will be transferred securely and separately from the main pupil file **as soon as possible, and within five days for an in-year transfer or within the first five days of the start of a new term. Confirmation of receipt will be obtained.**

In addition to transferring the child protection file, the DSL will consider whether it is appropriate to share relevant safeguarding information with the receiving school in advance of the child leaving, particularly where this would enable the receiving school to assess risk to the child or others and put appropriate safeguarding support in place for the child's arrival. Where there are safeguarding issues or concerns, direct communication between the DSLs of both settings will take place where appropriate.

8.4 Deputy Designated Safeguarding Leads (DDSLs)

Deputy DSLs are trained to the same standard as the DSL and are fully able to carry out all safeguarding duties in their absence. They maintain compliance with *KCSiE 2026* and receive regular updates on emerging threats, online harms, peer-on-peer abuse, and radicalisation.

8.5 All Staff

All staff - including governors, supply staff, contractors, and volunteers - must:

- all staff, including non-teaching staff, should read Part One of *KCSiE* in full;
- provide a safe environment in which children can learn and thrive;
- act in the best interests of pupils in all decisions and actions;
- report safeguarding concerns immediately to the DSL using the school's safeguarding recording system;
- maintain clear and comprehensive records of concerns, actions taken, decisions made, and outcomes; and
- attend regular safeguarding and child protection training, including updates on online safety, peer-on-peer abuse, and harmful sexual behaviour.

As frontline practitioners, staff are in a crucial position to identify concerns early, provide help, promote welfare, and prevent escalation.

9. Rights of the Child

Gatehouse School upholds the **Human Rights of every child** in accordance with the *Human Rights Act 1998* and the *European Convention on Human Rights*. The following Convention rights are embedded across all safeguarding policies and procedures:

- **Article 3:** The right to freedom from inhuman or degrading treatment (absolute right).
- **Article 8:** The right to respect for private and family life, including the duty to protect physical and psychological integrity (qualified right).
- **Article 14:** The right to enjoy all Convention rights without discrimination.
- **Protocol 1, Article 2:** The right to education.

In accordance with the *Equality Act 2010*, the school must not unlawfully discriminate against pupils because of protected characteristics, including **sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation**.

Gatehouse School takes appropriate and proportionate action to ensure equity, inclusion, and safety for all children, particularly those who may be disproportionately vulnerable.

The school recognises that children who are lesbian, gay or bisexual (LGB), or who are questioning their gender, may experience particular safeguarding risks, including bullying, harassment, discrimination, abuse, exploitation, social isolation or mental health difficulties. Such concerns will be taken seriously and addressed in accordance with the child's individual circumstances and safeguarding needs.

Where a child is questioning their gender, the school will act in accordance with KCSIE 2026 and its legal duties, considering the child's individual circumstances, wellbeing, safeguarding needs and best interests. Any request relating to social transition will be considered carefully, including appropriate consideration of parental/carer involvement and any relevant clinical advice.

Within safeguarding, and in line with *Keeping Children Safe in Education (2026)*, this means:

- taking **appropriate and proportionate** positive action to address disadvantage;
- making reasonable adjustments for disabled children (including those with long-term conditions); and
- ensuring that groups at higher risk of sexual violence, harassment, **abuse, exploitation or discrimination** receive appropriate additional protection.
- **ensuring that children are protected from bullying, harassment or abuse because of their sexual orientation, gender identity, perceived gender identity or gender expression.**
- **ensuring that staff do not make assumptions about a child's needs or safeguarding risk based solely on their sex, sexual orientation or gender identity.**

The school will balance its duties to protect children from discrimination and harm with its safeguarding responsibilities and the rights and responsibilities of parents/carers. Decisions concerning individual children will be made on a case-by-case basis, with the child's welfare and safeguarding needs at the centre of the decision-making process.

The school recognises that children from ethnically diverse backgrounds can be at risk of **adultification**, where their vulnerability may be overlooked due to racial bias or stereotypes. All staff are expected to challenge such bias actively and to ensure that equity, diversity, and inclusion remain central to Gatehouse School's safeguarding culture.

Gatehouse School aligns with the **London Borough of Tower Hamlets' commitment** to becoming an anti-racist borough.

In accordance with the *Tower Hamlets Safeguarding Children Partnership Anti-Racist Charter (2025)*, the school promotes a **whole-school approach to anti-racism**, advancing positive narratives, celebrating diversity, and contributing to social change through education.

10. Safeguarding in the Early Years Foundation Stage (EYFS)

Gatehouse School meets all safeguarding and welfare requirements set out in the ***Statutory Framework for the Early Years Foundation Stage (Department for Education, 2026)***.

This section should be read in conjunction with the following school policies and statutory guidance:

- **Staff Code of Conduct**
- **Intimate Care Policy**
- **Digital Images and Online Safety Policies**
- **Safer Recruitment Policy**
- **Health and Safety Policy**
- **First Aid and Administration of Medication Policies**
- **Behaviour Management Policy**
- **SEND and Inclusion Policy**
- **Whistleblowing Policy**
- **Complaints Policy**

It ensures that safeguarding arrangements for children in the EYFS (Nursery and Reception) reflect the requirements of the Early Years Foundation Stage (EYFS) Statutory Framework in force from 1 September 2026, Keeping Children Safe in Education 2026 and relevant Tower Hamlets Safeguarding Children Partnership guidance.

10.1 Leadership and Accountability

- The **Designated Safeguarding Lead (DSL)** holds overall responsibility for safeguarding and child protection across the EYFS.
- A member of the School's safeguarding team has specific responsibility for overseeing safeguarding within the EYFS provision and ensuring that the safeguarding and welfare requirements of the EYFS statutory framework are implemented effectively.
- At least one **DSL-trained member of staff** is on site whenever EYFS children are present.
- Clear safeguarding cover is maintained whenever the DSL is unavailable, including during periods of absence and, where applicable, school holidays. Deputy DSLs are trained and authorised to carry out the DSL's safeguarding functions when required.
- The **Headteacher** retains strategic oversight of EYFS welfare, safer recruitment, supervision, and staff suitability.
- The **Head of EYFS** oversees day-to-day implementation of safeguarding and welfare practices and reports directly to the DSL and Headteacher.

10.2 Staff Ratios and Supervision

- Children in EYFS are **supervised at all times**, indoors and outdoors.
- Staffing ratios meet or exceed statutory minimums as set out in **EYFS Statutory Framework in force from 1 September 2026**.
- *Reception (aged 4–5):* 1:30 with a qualified teacher.
 - *Nursery (aged 3–4):* 1:13 for a qualified teacher. 1:13 for a Level 3 practitioner with a qualified teacher present. 1:8 with a Level 3 practitioner without a qualified teacher.
- Staff are deployed to ensure sight and/or hearing of children at all times; staff breaks and cover arrangements are planned so that ratios are never compromised.
- Children are never left unsupervised with visitors or unvetted adults.
- Staff may be deployed flexibly across rooms and an adjoining outdoor area forming part of the same EYFS provision, provided that the statutory staff-to-child ratio is maintained across the provision and children remain appropriately supervised. Staff must not be counted simultaneously within EYFS ratios across unrelated areas of the wider School site.

10.3 Staff Suitability and Disqualification

- All EYFS staff, volunteers and students are subject to the appropriate safeguarding and suitability checks for their role, including enhanced DBS checks and Children's Barred List checks where the role constitutes regulated activity, together with identity verification and right-to-work checks.
- Where an enhanced DBS check is required for an individual working in the EYFS, the original DBS certificate must be received and checked by the School before the individual begins work. A risk assessment must not be used to permit an individual to begin work in the EYFS while the required certificate remains outstanding.

- At least one written reference must be obtained and checked before a new member of staff begins work.
- Annual declarations confirm compliance with the **Childcare (Disqualification) Regulations 2018**, made under sections 75–76 of the **Childcare Act 2006**.
- Staff and prospective staff must disclose any arrests, charges, convictions, cautions or other circumstances that may affect their suitability to work with children. Existing staff have an ongoing responsibility to inform the School without delay of any such matter arising during their employment.
- The school keeps a Single Central Record in line with *KCSIE 2026* and independent-school standards.

10.4 Form Teacher (Key Person) Arrangements

- Every EYFS child has a Form Teacher (**Key Person**) responsible for their care, wellbeing, and daily communication with parents/carers. (The form teacher is the key person).
- Key Persons build secure attachments with each child, ensure emotional needs are met, and act as the first point of contact for families.
- All welfare or safeguarding concerns identified by a Key Person are recorded promptly and escalated to the DSL.

10.5 Allegations and Notifications

Gatehouse School follows the requirements of **Part 4 of *Keeping Children Safe in Education (2026)*** and the **Tower Hamlets Safeguarding Children Partnership (THSCP) Supplementary Guidance – Managing Allegations and Concerns (2025)**.

Any allegations or safeguarding concerns regarding adults who work with, volunteer with, or have contact with children—whether on or off the premises—must be reported immediately to the Headteacher. The Headteacher acts as the case manager and will contact the **Local Authority Designated Officer (LADO)** without delay for guidance and oversight. The school will also notify the **Independent Schools Inspectorate (ISI) and/or the Department for Education (DfE)** of any serious incident or allegation, in line with statutory requirements and local safeguarding procedures.

In all cases the Headteacher will:

- record the incident, actions taken, and any external advice received;
- maintain communication with statutory agencies; and
- inform the Safeguarding Link Governor and Governing Body through the Headteacher's safeguarding report.

Staff Awareness

All EYFS staff, students and regular volunteers are made aware of the School's safeguarding and whistleblowing procedures as part of induction and through ongoing training and updates. Staff must understand how and when to report concerns, including

concerns about poor or unsafe practice, and be confident that genuine concerns will be taken seriously.

Training ensures that practitioners can:

- recognise and report concerns or allegations about adults;
- distinguish between harm-threshold and low-level concerns; and
- understand their duty to report immediately to the **Designated Safeguarding Lead (DSL)** or **Headteacher** without attempting to investigate.

Safeguarding training is refreshed at least every two years and updated regularly in response to local or national developments.

Failure to report a concern may itself constitute a safeguarding issue and will be dealt with under the school's **disciplinary procedures**.

10.6 Use of Mobile Phones, Cameras, and Digital Devices and Screens

Personal mobile phones are **not used** in EYFS classrooms or outdoor learning areas. Only **school-issued, password-protected devices** may be used to capture photographs or video for educational purposes, such as recording learning for individual profile books, displays, or internal assessment records.

Each EYFS class has access to a **labelled school camera or tablet** which is stored securely when not in use. Staff ensure that:

- Photographs are taken only by authorised practitioners and reflect the child's learning or participation in school life.
- Images are uploaded promptly to secure, school-approved platforms and deleted from the device once transferred.
- All images are stored in line with the **Digital Images Policy**, retained only as long as necessary, and deleted in accordance with the **Data Protection Act 2018** and **UK GDPR**.
- Devices are never taken off-site or used for personal purposes.

During **Computing lessons and guided activities**, children may use tablets or computers **under close adult supervision**. Staff model safe and responsible use of technology, including logging on, accessing approved websites or apps, and handling equipment carefully. Children are not permitted to take photographs or record video independently.

The School has regard to Department for Education guidance concerning screen use by children in the EYFS. Screen use includes interactive whiteboards, tablets, computers, videos, presentations, assemblies and other screen-based activities.

Screen use within Nursery and Reception will be purposeful, limited and age-appropriate and balanced with active, practical, social and play-based learning. Staff will take account of guidance concerning recommended daily screen use for

young children, recognising that a child's total screen use may include time both at home and at School.

Screens will not routinely be left on in the background or used simply to occupy children, manage transitions, calm children or regulate behaviour. Staff will consider the educational purpose, duration and developmental appropriateness of screen-based activities.

Parents and visitors are reminded that **the use of personal mobile phones or other devices to take photographs in EYFS areas is strictly prohibited**, unless prior authorisation has been granted by a member of staff (for example, during a performance or class event).

Any breach of this policy will be reported to the **Designated Safeguarding Lead** and managed in line with the school's **Safeguarding and Child Protection Policy**.

10.7 Intimate Care and Toileting

- Intimate care is carried out by known, vetted staff following the school's **Intimate Care Policy**.
- Children's privacy is considered and balanced with safeguarding and support needs when changing nappies and toileting.
- There is an adequate supply of towels, spare clothes, and any other necessary items.
- Any incident causing concern is recorded and reported to the DSL.

10.8 Welfare, Environment, and Safety

- A daily safety checklist is completed for all indoor and outdoor areas, noting any areas that require attention. The premises team is promptly informed of any issues.
- Sleeping children are checked at least every 5 minutes and monitored for temperature, breathing, and comfort.
- Cleaning materials, medication, and first-aid supplies are stored securely and out of reach of children.
- A monthly cleaning log of EYFS resources is maintained to ensure high standards of hygiene.
- Fire-drill and evacuation procedures are age-appropriate and practised termly.
- **Staff must not smoke, vape or use e-cigarettes on or near the premises when EYFS children are present or about to be present.**
- **Banned dog breeds must not be kept or allowed on the premises, including where an individual dog has a certificate of exemption.**
- **All EYFS children will have daily access to an outdoor play area. Outdoor access will only be restricted where conditions present a genuine safety risk to children.**

10.9 Food and Drink Safety

The School maintains robust arrangements to safeguard EYFS children when food and drink are prepared, served and consumed.

- A designated member of staff will oversee the provision of food and drink in each area where EYFS children are eating.
- Before food or drink is provided to a child, staff must check it against the child's recorded allergies, intolerances, dietary requirements and relevant medical information.
- Up-to-date information concerning allergies, intolerances and dietary requirements will be readily available to staff responsible for preparing, serving or supervising food and drink.
- The School's allergy procedures and risk assessments apply to both food and drink.
- Children will be appropriately supervised while eating and drinking, taking account of their age, developmental needs and any identified choking or allergy risks.

10.10 Reporting and Referral to the DSL

All EYFS practitioners must respond immediately to any concern about a child's safety or welfare.

When to refer:

Practitioners must **report without delay** to the Designated Safeguarding Lead (DSL) or Deputy DSL any concern regarding:

- Unexplained marks or injuries
- Disclosures or worrying changes in behaviour
- Neglect, inadequate supervision, or poor hygiene
- Exposure to domestic abuse, violence, or substance misuse
- Emotional distress, anxiety, or withdrawal
- Online safety or inappropriate contact
- Any situation in which a child appears unsafe or fearful

How to refer:

- Record the concern on CPOMS (or the designated safeguarding system) on the same working day.
- If a child is in immediate danger, contact the DSL and/or emergency services at once.
- The DSL decides on the next steps - Early Help, referral to Children's Social Care, or Police involvement - and records all actions and decisions.
- Staff must never assume another person will take action.

10.11 Communication, Language and the Role of the Form teacher(Key Person)

Gatehouse School recognises that very young children are still developing an understanding of language and may not have the vocabulary or emotional literacy to describe neglect, harm, or unsafe experiences. Staff understand that:

- **Children in Nursery and Reception may show distress through behaviour rather than words**—for example, withdrawal, aggression, regression in toileting, or changes in play themes.
- **Disclosures may be non-verbal.** Practitioners remain alert to body language, facial expressions, or role-play that suggests worry, fear, or harm.
- **The Key Person plays a pivotal role** in noticing subtle changes because they see the child most frequently and build trusted, secure attachments that help the child feel safe to communicate.
- Key Persons use age-appropriate language, storybooks, puppets, or visual aids to help children express feelings and recognise safe and unsafe situations.
- Practitioners model accurate words for body parts and emotions, fostering early protective language such as “safe,” “private,” “help,” and “stop.”
- The EYFS team uses consistent routines and calm, predictable interactions to create psychological safety, enabling children to seek comfort or disclose concerns.
- Where a child’s speech, hearing, or understanding is delayed, staff adapt communication using signs, visual cues, repetition, or support from the SENCO
- All observations of concerning language, play, or behaviour are recorded and discussed with the DSL immediately.

This proactive approach ensures that even the youngest or least verbal children are *heard, understood, and protected* within the safeguarding system.

10.12 Partnership with Parents and Carers

- The school promotes open communication with parents through the Form Teacher(Key Person)
 - Parents are encouraged to share information about home circumstances that may affect a child’s wellbeing.
 - Parents and carers are encouraged to keep the School informed of changes to medical needs, allergies, dietary requirements or other information relevant to their child’s safety and welfare.
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11. Children Who May Be at Greater Risk of Harm

All staff should recognise that all children are vulnerable but that some children may be more vulnerable than others and **may be at greater risk of harm**. Children known to a social worker, looked-after children and care leavers are likely to have suffered abuse at some point in their childhood and may be more vulnerable to further abuse, including exploitation.

Staff need to be aware that other children who may be **at greater risk of harm** include a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- has experienced multiple suspensions and is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of so-called honour-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day;
- is experiencing or is at risk of child-on-child abuse, including bullying, sexual harassment, sexual violence, harmful sexual behaviour or serious violence;
- is experiencing or is at risk of abuse or exploitation through online activity, social media or other digital environments;
- is experiencing or is at risk of violence against women and girls (VAWG), misogyny, misandry, teenage relationship abuse or other forms of gender-based harm;
- is lesbian, gay or bisexual (LGB), or is questioning their gender, where this may increase their vulnerability to bullying, harassment, discrimination, abuse, exploitation or other safeguarding concerns;
- is affected by multiple or intersecting vulnerabilities, where individual risk factors may combine to increase the likelihood or impact of harm.

Staff must be vigilant and proactive in their day-to-day work with children when the above vulnerabilities are known, report all concerns immediately to the Designated Safeguarding Lead, and ensure records reflect the child's specific risk factors, including online, extra-familial and child-on-child abuse concerns.

Staff should recognise that vulnerability is not determined by a single characteristic or circumstance. A child may experience increased risk where several factors intersect, for example disability and ethnicity, SEND and social isolation, or LGB identity or gender questioning alongside bullying or other safeguarding concerns. Staff must consider the individual child's circumstances rather than making assumptions based on any single characteristic.

The school will ensure that children who may be at greater risk of harm receive appropriate support and that safeguarding responses are proportionate to their individual circumstances. Being identified as potentially vulnerable does not mean that a child will inevitably experience harm, and staff should remain alert to changes in circumstances and emerging risks.

In accordance with Keeping Children Safe in Education (KCSIE) 2026, staff should maintain an “it could happen here” approach and recognise that safeguarding concerns may arise both inside and outside the school environment, including through online activity and within children’s peer groups and relationships.

12. Children in Need of a Social Worker

Children who have been allocated a **social worker** may have experienced abuse, including neglect, and often live in families with complex circumstances. Staff should recognise that these children may have experienced adversity and trauma that can leave them more vulnerable to further harm. Such experiences can also impact their attendance, learning, behaviour, relationships, and mental health.

When making decisions about safeguarding, carrying out a risk assessment, or responding to concerns such as unauthorised or persistent absence, the school recognises that children with a social worker require **enhanced pastoral and academic support** alongside that provided by statutory services.

Gatehouse School is also committed to supporting children who have **had previous involvement with social care**, in recognition that the effects of abuse or trauma may continue long after formal intervention has ended.

The school works closely with the **Tower Hamlets Virtual School**, which holds a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children known to a social worker, in line with *Keeping Children Safe in Education (2025)*.

12.1 Implications for Staff

All staff must:

- remain **vigilant and proactive** in identifying and supporting children known to a social worker;
- recognise signs of vulnerability, distress, or withdrawal;
- **report safeguarding concerns immediately** to the DSL;
- provide **trauma-informed pastoral and academic support**, recognising the impact of adverse childhood experiences (ACEs);
- maintain accurate safeguarding records and ensure timely information sharing with the DSL, social workers, and other relevant professionals;

- collaborate with the **Virtual School**, children's social care, and external agencies to promote stability, safety, and progress; and
 - consider **the child's wishes and feelings** in all decisions affecting their welfare and support.
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13. Children Requiring Mental Health Support

All staff should be aware that **mental health difficulties can be both a symptom and an indicator** that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation — whether online or offline.

While only appropriately trained professionals should make formal diagnoses of mental health conditions, school staff are well placed to observe pupils day to day and identify those whose behaviour suggests they may be experiencing a mental health problem, or may be at risk of developing one.

Children who have suffered abuse, neglect, or other potentially traumatic **Adverse Childhood Experiences (ACEs)** may experience a lasting impact on their mental health, wellbeing, and learning.

In line with *Keeping Children Safe in Education (2026)*, staff are expected to adopt a **trauma-informed and relational approach**, recognising the cumulative effects of trauma and responding with sensitivity and consistency.

13.1 Referral and Support Pathway

If a member of staff has a concern about a pupil's mental health or emotional wellbeing, they must take **immediate action** by speaking to the **Designated Safeguarding Lead (DSL)** or a **Deputy DSL**.

The DSL will assess the situation and, where appropriate, contact relevant external agencies such as the **Early Help Hub**, **CAMHS**, or **Children's Social Care**.

Gatehouse School has established a clear **referral pathway and internal support system** for children experiencing mental health difficulties. All staff are expected to report concerns promptly to the **Pastoral Lead, Pauline Moisy**, a member of the Senior Leadership Team (SLT).

The Pastoral Lead will:

- assess the concern and provide initial support;
- coordinate appropriate interventions; and
- liaise with external agencies such as the **Tower Hamlets Education Wellbeing Service**, **CAMHS**, or other specialist support services.

13.2 Whole-School Approach

Staff play a vital role in supporting children's mental health by:

- monitoring pupils' wellbeing and behaviour over time;
- implementing classroom strategies recommended by the Pastoral Lead or external professionals; and
- providing ongoing pastoral support within a safe, trusting environment.

Gatehouse School adopts a **whole-school approach to mental health**, embedding wellbeing into policies, curriculum planning, and pastoral systems. This ensures that every child receives consistent and compassionate support both in and beyond the classroom.

14. Looked After, Previously Looked After, and Kinship Care Children

The most common reason for children becoming **Looked After** by the Local Authority is as a result of abuse or neglect.

Gatehouse School recognises that **Looked After Children (LAC)**, **Previously Looked After Children (PLAC)**, and children in **Kinship Care arrangements** may experience additional barriers to learning, wellbeing, and safety, and therefore require enhanced support.

14.1 Staff Awareness

All staff must have the knowledge, skills, and understanding to safeguard and promote the welfare of children who are, or have been, looked after. Staff should recognise the impact that trauma, separation, and attachment difficulties can have on a child's behaviour, learning, and relationships, and respond with a trauma-informed and relational approach.

14.2 Designated Safeguarding Lead (DSL)

The **DSL** works closely with the **Designated Teacher (for the safeguarding team)** and relevant agencies to take immediate action when safeguarding concerns arise and to coordinate ongoing support for this vulnerable group.

The DSL also liaises with the **Local Authority's Personal Advisor** appointed for **Care Leavers** to ensure that any issues or concerns affecting the young person's welfare, education, or transition to independence are addressed through effective, personalised support.

14.3 Looked After Children, Previously Looked After Children and Children in Kinship Care Arrangements

The most common reason for children becoming looked after by the Local Authority is abuse, including neglect. Staff must have the skills, knowledge, and understanding to safeguard **Looked After Children (LAC)** and **Previously Looked After Children (PLAC)**, recognising their heightened vulnerability.

The school's **Designated Safeguarding Lead (DSL)** and the **Designated Teacher** will:

- Work with relevant agencies to take immediate action to safeguard and support this vulnerable group.
- Collaborate with the Tower Hamlets Virtual School to discuss the best use of funding to support LAC progress and meet the needs identified in each child's **Personal Education Plan (PEP)**.
- Work with the Virtual School Headteacher to safeguard and promote the educational outcomes of LAC and Care Leavers, including implementing robust teaching and learning plans.
- Liaise with the Local Authority's Personal Advisor for Care Leavers to address any issues affecting care leavers and ensure effective support is provided.

Since September 2024, the Tower Hamlets Virtual School also holds a **non-statutory responsibility** to promote the education of children in **kinship care arrangements**, whether or not they have been previously looked after.

Gatehouse School works in partnership with the Virtual School to monitor and champion the **attendance, attainment, and progress** of children in kinship care.

Definition and Types of Kinship Care:

Kinship care refers to any arrangement in which a child is raised by relatives or family friends who are not their parents. These arrangements may be temporary or long-term and can include:

- Private Fostering Arrangements
- Special Guardianship Orders (SGO)
- Child Arrangements Orders (CAO)

The school recognises that children in kinship care may face unique emotional and practical challenges and ensures that **appropriate pastoral and academic support** is in place.

15. Children with Special Educational Needs or Disabilities

Children with **special educational needs and disabilities (SEND)** or **physical health conditions** can face additional safeguarding challenges.

Gatehouse School recognises that these pupils may experience a range of vulnerabilities which require staff to be especially vigilant, sensitive, and proactive in identifying signs of harm.

15.1 Additional Barriers to Recognising Abuse

Barriers to identifying abuse or neglect among children with SEND may include:

- adults incorrectly assuming that changes in behaviour, mood, or injury are linked solely to the child's disability rather than a potential safeguarding concern;
- children being socially isolated or excluded from peer groups;
- a higher likelihood of experiencing bullying, including **online** or **prejudice-based bullying**, without visible signs;
- difficulties understanding that what is happening to them constitutes abuse or exploitation; and
- communication barriers that make it difficult for the child to disclose abuse or express their feelings.

Some disabled children may depend on parents, carers, or staff for daily living tasks and intimate care, which may increase their exposure to potential abuse or reduce their ability to resist or avoid it.

Looked After Disabled Children may be particularly vulnerable due to their additional dependency on adults in residential, health, or foster care settings.

15.2 Staff Responsibilities

All staff receive regular training on the additional safeguarding barriers faced by pupils with SEND and physical health conditions, including risks related to online environments. In line with *Keeping Children Safe in Education (2026)*, staff must:

- remain **alert to indicators of abuse, neglect, or exploitation**;
- **report any concerns immediately** to the **Designated Safeguarding Lead (DSL)** or a **Deputy DSL**;
- take time to **listen carefully** and observe pupils' verbal and non-verbal communication; and
- adapt their approach to meet each child's individual needs, recognising how anxiety, sensory overload, or behavioural changes may indicate distress.

Staff should never make assumptions that a child's behaviour or presentation is solely linked to their SEND or medical condition without further exploration.

15.3 Coordinated Support

The **DSL**, **SENCO (Deputy DSL)**, and **School Nurse (Deputy DSL)** work closely together to ensure that safeguarding arrangements for pupils with SEND or physical health needs are robust and inclusive. This includes:

- developing and reviewing **individual safeguarding risk assessments**;
- adapting **online safety measures** to ensure accessibility and comprehension;
- coordinating **healthcare plans, pastoral interventions, and reasonable adjustments**;
- ensuring all staff are briefed on subtle or complex indicators of harm; and
- engaging with **parents/carers** and **external professionals**, such as therapists, health practitioners, and social workers, to provide joined-up support.

Where additional intervention is required, the DSL ensures appropriate **multi-agency involvement** through Early Help, Children's Social Care, or Team Around the Child meetings.

The DSL and SENCO also contribute to **Education, Health and Care Plan (EHCP)** reviews to ensure safeguarding remains integral to all support planning.

15.4 Empowerment and Inclusion

All staff play an active role in overcoming communication and participation barriers. Pupils' **voices, wishes, and feelings** are sought and valued in all safeguarding decisions, using the most effective communication methods for their needs — including augmentative or alternative communication systems where appropriate.

The school promotes a **trauma-informed and relational approach**, recognising that frustration, avoidance, or withdrawal may be expressions of distress rather than misbehaviour.

Staff support pupils with empathy, patience, and consistency, promoting their independence, dignity, and right to be heard.

15.5 Whole-School Approach

Gatehouse School ensures that safeguarding systems, reporting tools, and curriculum materials are **accessible and inclusive** for all learners.

Wellbeing and resilience are embedded throughout the curriculum, pastoral provision, and daily routines.

Staff work collectively to remove barriers, reduce risks, and ensure that every child — regardless of ability or health status — is **protected, supported, and able to thrive**.

This approach reflects *KCSIE (2026)*, *Working Together to Safeguard Children (2023)*, and the *SEND Code of Practice (2015)*, as well as guidance from the **Tower Hamlets Safeguarding Children Partnership**.

15.6 Further Guidance

For additional information, staff should refer to:

- *Safeguarding Disabled Children* (DfE, 2009);
 - *NSPCC: Safeguarding Children with Special Educational Needs and Disabilities* (May 2022); and
 - *NSPCC: Safeguarding Deaf Children and Children with Disabilities at Greater Risk of Abuse* (June 2024).
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16. Children Absent from Education and Missing Education

Gatehouse School closely monitors **attendance, absence, suspensions, and exclusions** as part of its safeguarding duties. A child who is absent or missing from education—whether repeatedly or for a prolonged period - may be at risk of a wide range of safeguarding issues, including:

- abuse or neglect;
- child sexual abuse or child sexual exploitation (CSE);
- child criminal exploitation (CCE), including county lines activity; or
- emerging **mental health** concerns.

Staff are alert to additional vulnerabilities among children already known to be at risk, including those with a **social worker**, those **Looked After**, or those who have **SEND**. Persistent absence or patterns of unexplained non-attendance may also signal other risks, such as **female genital mutilation (FGM)**, **forced marriage**, or **travel to conflict zones**.

In accordance with the DfE's statutory guidance *Working Together to Improve School Attendance and Keeping Children Safe in Education (2026)*, Gatehouse ensures **prompt follow-up and early intervention** for all absences to prevent pupils from becoming children missing education in the future.

16.1 Procedures for Unexplained Absences

Where a pupil is absent without prior notification, these steps are followed:

1. **By 9:30 am:** Reception contacts parents by phone.
2. If unreachable, **email** the parent.
3. If still no response, **send a text message** requesting immediate contact.
4. If there is no reply, **contact other authorised adults** listed on the pupil's record.
5. **By 12:00 pm:** If the child's whereabouts remain unknown, refer the matter to the **Tower Hamlets Attendance and Welfare Adviser** for support.

6. If, after these steps, the child is still unaccounted for, the DSL or Headteacher will make a **Missing Children referral** to the **Local Authority**.

Tower Hamlets CME Officer Contact:

Saadia Anwer – Tower Hamlets Education Safeguarding Service

 Saadia.Anwer@towerhamlets.gov.uk

 020 7364 3426 / 07562 431 817

16.2 Children Missing Education (CME)

Children Missing Education (CME) are children of compulsory school age who are not registered pupils at any school and are not receiving suitable education elsewhere. These children are at significant risk of:

- **underachievement;**
- **harm or exploitation;**
- **radicalisation;** or
- becoming **NEET** (not in education, employment, or training).

Gatehouse School follows the *Tower Hamlets CME Protocol* and liaises closely with the Local Authority Attendance and Welfare Service to ensure all CME cases are identified, tracked, and followed up promptly.

16.3 Pupils Absent Due to Illness

For absences related to illness:

- The **School Nurse** contacts parents to confirm the reason for absence.
- Once verified, the **School Receptionist** updates the registration system immediately.
- Prolonged or repeated medical absences are referred to the **DSL** for monitoring and possible Early Help intervention.

16.4 Attendance Monitoring by the DSL

Attendance data is reviewed **weekly** by the DSLs, Pauline Moisy and Fiona Tighe to identify patterns or emerging concerns.

Attendance %	Status	Action
95–100%	Expected	No action required
90–95%	Emerging concern	DSLs email parents
85–90%	Cause for concern	DSLs calls parents
Below 85%	Serious concern	Parent meeting arranged

For children under five, attendance is not legally required; however, parents are expected to notify the school of their child's absence by 9:00 am so that registers can be accurately updated and to ensure there are no safeguarding issues.

All prolonged or repeated absences are referred to the DSL, who will determine whether a **safeguarding response** or **Early Help referral** is required.

For full operational details, refer to the **Children Absent from School Policy** and **Attendance Policy**.

16.5 Non-Standard Transition Notifications

Gatehouse School must notify the **Local Authority** when:

- a pupil is **removed from roll** before completing their final year, or
- a pupil is **added to roll** at a **non-standard transition point** (e.g., mid-term transfer).

Required information for pupil removal:

- Full name, date of birth, and gender;
- Parent/carer contact details and address;
- New address or destination school (if known);
- Expected start date and reason for leaving.

Required information for new admissions:

- Full name, date of birth, and sex;
- Parent(s) names, addresses, and at least **two emergency contacts**;
- Previous school details and boarding/day status.

Notifications are submitted within **five days** of a pupil joining or leaving.

16.6 Safeguarding Context

Gatehouse School recognises that children missing or absent from education are at heightened risk of **underachievement, harm, exploitation, and radicalisation**.

The DSL maintains oversight of attendance data, ensures effective communication with parents and agencies, and coordinates intervention where patterns of absence raise safeguarding concerns.

All staff play a part in identifying attendance issues early and ensuring that **every pupil remains visible, safe, and supported**.

17. Elective Home Education (EHE)

Gatehouse School recognises that **parents have a legal right to electively home educate** their child. However, it is expected that any decision to do so is made with the **child's best educational interests and welfare** at heart.

While many home-educated children thrive, staff are aware that this is not always the case. Home education can mean that some children are **less visible to safeguarding and support services**, and therefore may be at greater risk if abuse, neglect, or exploitation is present.

When a parent informs the **Headteacher** of their intention to withdraw their child for elective home education:

- The **Headteacher** will notify the **Designated Safeguarding Lead (DSL)** immediately.
- The school will **convene a multi-agency meeting** with the **Local Authority (LA)**, parents/carers, and all relevant professionals currently involved with the child and family (e.g., social worker, SENCO, school nurse, or virtual school representative).
- This meeting must occur **before any decision is finalised**, in accordance with **Tower Hamlets Local Authority Policy**, to ensure that the child's needs, vulnerabilities, and best interests have been carefully considered.

This process is especially critical for:

- children known to a **social worker**;
- pupils with **special educational needs or disabilities (SEND)**;
- **Looked After or Previously Looked After** children; and
- children already identified as at risk of **persistent absence, mental health difficulties, or family stressors**.

All discussions, decisions, and outcomes of the meeting must be **clearly documented** and shared with the **Local Authority Education Welfare Service** and the **Attendance and Welfare Advisor**, in line with *KCSIE 2026* and *Working Together to Safeguard Children (2023)*.

17.1 Children Temporarily Educated at Home

In exceptional circumstances, a child may need to be educated from home temporarily. This may occur:

- during a **public health emergency** (e.g., pandemic);
- while recovering from **illness, injury, or surgery**; or
- due to a **communicable disease** or other medical condition.

In such cases:

- The school will maintain **regular contact** with the family and pupil, typically through **Zoom or other secure online platforms**.

- The **class teacher and pastoral team** will ensure that suitable work is provided and that the pupil remains engaged with learning.
- The **DSL** will maintain **oversight of welfare and visibility**, liaising with the **School Nurse** and other professionals where appropriate.
- Any safeguarding or wellbeing concerns identified during this period will be **recorded and followed up** in accordance with this policy.

17.2 Safeguarding Oversight

In both elective and temporary home education scenarios, Gatehouse School remains committed to ensuring that all children:

- remain **visible, supported, and safe**;
- have their **voice heard and welfare prioritised**; and
- are provided with opportunities for **reintegration** or continued support if they return to school.

This section reflects *Keeping Children Safe in Education (2025)*, the *DfE Elective Home Education Guidance (April 2019)*, and the *Tower Hamlets Safeguarding Children Partnership Procedures*.

18. Whistleblowing and Raising Concerns

All staff have a responsibility to raise concerns about **poor or unsafe practice** and potential failures in any aspect of the school's **safeguarding arrangements**. Gatehouse School promotes an open culture where concerns can be raised **without fear of reprisal** and with the confidence that they will be taken seriously and acted upon.

18.1 Internal Reporting

- Staff should raise concerns in the first instance with the **Headteacher**.
- If the concern relates to the Headteacher, or if staff believe the matter has not been properly addressed, they should escalate the concern to the **Chair of Governors**.
- All concerns will be treated in confidence and handled in accordance with the **Whistleblowing Policy**.

The Senior Leadership Team and Governing Board are committed to ensuring that any reported issues are **investigated promptly and fairly** and that staff who raise genuine concerns are **protected from victimisation or detriment** under the *Public Interest Disclosure Act 1998*.

18.2 External Reporting

If a staff member feels unable to raise a concern internally, or believes that their genuine concerns have not been addressed, they may consider other external routes available to employees as set out in the Government's guidance "**Whistleblowing for Employees**".

For safeguarding-related concerns, staff can report directly to:

- **The NSPCC Whistleblowing Advice Line** – a free and anonymous service for professionals who wish to raise concerns about the way a safeguarding issue has been handled.
 -  **0800 028 0285**
 -  nspcc.org.uk/whistleblowing
 - Email: help@nspcc.org.uk
 - Other **Prescribed Bodies** listed in the Government's *List of Prescribed Persons and Bodies* (e.g., Ofsted, DfE, or Local Authority Designated Officer, depending on the concern).
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19. Reporting of Allegations Against Staff and Concerns That Do Not Meet the Harm Threshold

All adults working with children at Gatehouse School have a statutory duty to act if they are concerned that any member of staff, volunteer, contractor, governor, or visitor may pose a risk of harm to pupils. This includes behaviour that occurs **on or off school premises** and **online**.

The school follows *Part 4 of Keeping Children Safe in Education (2026)* and the *Tower Hamlets Safeguarding Children Partnership (THSCP) Supplementary Guidance – Managing Allegations of Abuse Against Staff (September 2025)*.

The welfare of the child is **paramount**.

19.1 Allegations Meeting the Harm Threshold

An **allegation of harm** is made when an individual has:

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

19.2 Reporting Procedure

- All staff must report **any allegation or concern**, regardless of the source, **immediately** to the **Headteacher** and ensure it is **recorded in writing, signed, and dated**.
- If the allegation concerns the **Headteacher**, the report must be made directly to the **Chair of Governors**.
- Upon receipt, the **Headteacher (or Chair of Governors)** will contact the **Local Authority Designated Officer (LADO)** without delay for an **initial discussion** and advice on next steps.
- The **Headteacher** acts as **case manager** for all allegations against staff, including **supply staff**.
- When an allegation concerns an **external organisation** using the school premises, the Headteacher must still seek guidance from the LADO.
- **Historical allegations** or those concerning staff who no longer work at the school will be referred to the **police** in line with *KCSIE 2026*.

Tower Hamlets LADO Contact

 Melanie.Benzie@towerhamlets.gov.uk

LADO@towerhamlets.gov.uk

 020 7364 0677

19.3 Early Years Foundation Stage (EYFS)

In accordance with the *EYFS Statutory Framework (2025)*, registered Early Years settings must notify the **DfE** of any serious allegations of harm and the actions taken **as soon as reasonably practicable** and **no later than 14 days**.

Failure to do so without reasonable excuse constitutes an offence.

19.4 Concerns That Do Not Meet the Harm Threshold (Low-Level Concerns)

Concerns that **do not meet the criteria for an allegation** under *KCSIE 2026 Part 4* are known as **low-level concerns**. Such concerns may include behaviour that is inconsistent with the Staff Code of Conduct but not serious enough to meet the threshold above.

Although termed “low-level,” these concerns are **not insignificant**. All staff must report - and, where relevant, **self-report** - such concerns **immediately** to the **Headteacher**, who will assess the information and seek advice from the **LADO** when appropriate.

If the concern involves the Headteacher, it should be reported to the **Chair of Governors**.

19.5 Recording and Monitoring

- All low-level concerns will be **recorded in writing**, including the context, nature of the concern, actions taken, rationale, and outcome.
- Records are stored securely and confidentially in accordance with the *Data Protection Act 2018* and *UK GDPR* and retained until the staff member leaves employment.
- The **Headteacher** reviews all low-level concerns **termly** to identify emerging patterns or trends.
- Repeated or escalating concerns will be referred to the **LADO**, and may trigger additional training, supervision, or policy review.

19.6 Staff Responsibilities and Protection

- All staff are expected to maintain the **highest professional standards** and to report any concern about another adult's conduct, **inside or outside the school**, including online behaviour.
 - The **Staff Code of Conduct** cross-references this section and provides self-referral guidance.
 - Staff who raise genuine concerns are **protected under the Public Interest Disclosure Act 1998** and the School's **Whistleblowing Policy**.
 - Failure to report a concern may itself be treated as a safeguarding matter.
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20. Staff Safeguarding Training, Including Training for Governors

All staff, governors, trustees, and volunteers must undertake safeguarding and child-protection training as part of their induction and throughout their employment.

This ensures that every adult working within Gatehouse School understands their statutory duties under *Keeping Children Safe in Education (2026)* and Tower Hamlets guidance and can safeguard children effectively in both physical and online contexts.

Training includes **online safety**, covering expectations, roles, and responsibilities in relation to **filtering and monitoring systems**, emerging digital risks, misinformation/disinformation, and the **safe use of generative AI**, as required by *KCSIE 2026*.

Learning outcomes are monitored, and the impact of training is evaluated annually by the **DSL** and reported to the **Governing Board**.

20.1 Safeguarding Training Offer

All staff—including newly appointed staff, temporary employees, peripatetic teachers, and volunteers—receive **DSL-led induction training** immediately upon appointment.

In-house whole-staff safeguarding training is delivered by the DSL at the start of each academic year, with **annual updates** covering changes in statutory guidance and emerging safeguarding risks such as online harms and harmful sexual behaviour.

Additional components include:

- **Prevent Duty** online training (Tower Hamlets or accredited provider).
- **ECP** or equivalent accredited safeguarding modules for governors, peripatetic staff, and contractors.
- Catch-up sessions for anyone who misses training.
- Updates to safeguarding including internal reviews of practice are discussed in weekly staff briefings and recorded in the meeting minutes

20.2 Induction for All New Staff

Induction training provides formal child-protection instruction, including:

- this **Safeguarding and Child Protection Policy** and related policies (anti-bullying, Online Safety, child-on-child abuse, behaviour, mental health, wellbeing, and whistleblowing);
- **Part 1 and Annex A of KCSIE (2026)**;
- the **roles and contact details** of the DSL and Deputy DSLs, including EYFS responsibilities;
- policies on **acceptable use of IT, online safety, and children absent from education**;
- the **Staff Code of Conduct** and **Whistleblowing Policy**;
- an overview of **Tower Hamlets Safeguarding Children Partnership** procedures;
- All new staff receive paper or digital copies of these documents and must sign a declaration confirming they have **read, understood, and will adhere** to them.

Volunteers and temporary staff receive proportionate induction based on their role and level of contact with children.

20.3 Ongoing Safeguarding Training

All staff, including the Headteacher and volunteers in regulated activity, undertake refresher training at least **every two years**, supplemented by **annual updates** through INSET, e-bulletins, or accredited e-learning.

Training content covers:

- professional boundaries and **low-level concerns**;
- recognising that children may not disclose abuse or may not perceive it as harmful;
- applying **professional curiosity** and reporting all concerns to the DSL;
- managing reports of **child-on-child sexual violence and harassment**;
- building **trusted relationships** with pupils; and
- emerging risks such as online harms, radicalisation, CSE, CCE, FGM, and mental-health concerns.

Staff receive revised policy documents whenever statutory guidance changes and must reconfirm understanding of *KCSIE 2026 Part 1 and Annex A*.

20.4 Designated Safeguarding Lead (DSL) and Deputy DSL Training

The **DSL team** undertakes specialist **Designated Safeguarding Lead** and **inter-agency procedures** training, refreshed every two years and supplemented by annual knowledge updates.

Training ensures the DSLs can:

- coordinate early help and multi-agency assessments;
- contribute effectively to child-protection conferences and reviews;
- maintain accurate written records and secure data management;
- understand the specific needs of children with SEND, those known to social care, and young carers;
- provide staff guidance on **Prevent Duty** and **online-safety filtering/monitoring**; and
- lead a culture of **listening to children** across the school.

Specialist modules are undertaken for **EYFS**, **Looked-After Children**, and **mental-health** safeguarding.

20.5 Governors' and Trustees' Training

All governors and trustees complete safeguarding induction training and receive **regular updates** to enable them to discharge their strategic safeguarding duties effectively.

Training includes:

- annual **KCSIE updates** and Tower Hamlets local safeguarding arrangements;
- **online-safety and digital-risk awareness** (including filtering, monitoring, and AI considerations); and
- specific **EYFS safeguarding responsibilities** for those overseeing Early Years provision.

The Governing Board reviews safeguarding training compliance annually to ensure all members remain informed, confident, and able to provide appropriate **strategic challenge** and assurance.

20.6 Record-Keeping and Evaluation

The **DSL** maintains a **training log** for all staff and governors, recording completion dates, updates, and outstanding requirements.

Training impact is evaluated through staff feedback, safeguarding audits, and case-review learning, with outcomes reported to the **Senior Leadership Team** and **Governors** each term.

21. Visitor Management and Safeguarding

Gatehouse School is committed to ensuring that all visitors are managed safely and appropriately to protect pupils, staff, and the wider school community.

All procedures reflect *Keeping Children Safe in Education (2026)*, *Working Together to Safeguard Children (2023)*, and *EYFS Statutory Framework (2024)* requirements.

21.1 Arrival and Signing-In Procedures

- All visitors enter the premises through **secure gates and doors** and use the **intercom system** to access the school reception area.
- Visitors must **sign in** using the **electronic visitor management system** or visitor logbook and are required to **read the School's Safeguarding and Child Protection Information for Visitors**, which includes guidance on:
 - child protection and online safety;
 - professional conduct; and
 - emergency and evacuation procedures.
- Safeguarding posters in reception clearly display the **names and roles of the DSL and Deputy DSLs**.
- All visitors must wear a **school-issued lanyard or identification sticker** at all times.
- Visitors who have **not undergone a DBS check** must be **accompanied or supervised** at all times while on site.

21.2 Verification and Vetting

The school follows strict safer recruitment principles in accordance with *KCSIE 2026* when verifying visitor credentials. All external visitors and professionals are required to present **official photographic identification** and, where applicable, **proof of DBS clearance**.

External speakers and visitors engaging directly with pupils are subject to the school's **vetting and risk assessment process**, which includes:

- DBS checks and verification in line with *KCSIE 2026*;
- online and social media searches;
- prior approval by the **Headteacher** or **DSL**;
- assessment of suitability for working with children aged 0–5 (EYFS), ensuring compliance with welfare requirements; and
- adherence to the **School's External Speaker and Visitor Protocol**, ensuring all content is **age-appropriate, balanced, and aligned with British Values** under the **Prevent Duty**.

Records of vetting checks and risk assessments are securely stored in line with the *Data Protection Act 2018* and *UK GDPR*.

21.3 Statutory and Professional Visitors

When a **Social Worker, Police Officer**, or another professional visits the school to meet a child as part of a statutory investigation or intervention:

- The **school retains overall safeguarding responsibility** for the child's welfare during the visit.

- The child must have an **appropriate adult present** when interviewed by the Police, in accordance with the *Police and Criminal Evidence Act (PACE) Code C* guidance.
- For **EYFS children**, additional adult support and a familiar setting are provided to reflect their developmental stage and emotional needs.

21.4 Supervision in EYFS Settings

For Early Years settings, all visitors must be **supervised at all times** when in areas where children aged **0–5** are present, unless:

- an **enhanced DBS check** has been verified, and
- **EYFS suitability checks** have been completed in line with welfare and safeguarding requirements.

Visitors who have not been checked or verified must never be left alone with children.

21.5 Safeguarding Responsibilities

All visitors are reminded that **safeguarding is everyone's responsibility**.

If a visitor becomes concerned about a child's welfare or behaviour, or about the conduct of a member of staff or another visitor, they must report their concern **immediately to the DSL or a member of the Safeguarding Team**.

Visitors are also briefed on how to report **online safety concerns** or **exposure to inappropriate digital content** encountered during their visit.

22. Alternative Provision Providers

When Gatehouse School commissions an **alternative provision placement** in the best interests of a pupil, the school retains **full responsibility for that child's safeguarding, welfare, and educational outcomes**.

Alternative provision may include off-site education, therapeutic programmes, or vocational placements designed to meet specific individual needs.

All arrangements comply with *Keeping Children Safe in Education (2025)* and the DfE statutory guidance *Arranging Alternative Provision*.

22.1 Due Diligence and Agreements

Before any placement begins, the **Designated Safeguarding Lead (DSL)** and **Headteacher** will ensure that:

- a **written agreement** is in place setting out roles, responsibilities, reporting expectations, and safeguarding protocols;
- the provider has appropriate **safeguarding and child-protection policies**, including online-safety procedures, that align with *KCSIE 2026*;
- the school has verified that **suitable safer-recruitment checks** (including enhanced DBS and barred-list checks) have been completed for all staff and volunteers working directly with pupils; and
- the provider agrees to **notify the school immediately** of any safeguarding incident, absence, or staff change that could affect the pupil's safety.

Written confirmation of these checks and procedures will be securely retained by the school.

22.2 Attendance, Record Keeping, and Monitoring

The school maintains an accurate **written record** of:

- the pupil's **placement address** and timetable;
- any **sub-contracted provision** or **satellite sites** attended; and
- the **name and contact details** of the provider's safeguarding lead.

Attendance and engagement will be **monitored daily** through agreed reporting systems.

The DSL will review each placement **at least half-termly**—or sooner if concerns arise—to ensure that:

- the child is attending regularly;
- the environment remains safe and appropriate; and
- the provision continues to meet the pupil's academic, pastoral, and safeguarding needs.

22.3 Responding to Concerns

If any safeguarding concern arises, the school will:

1. **Review the placement immediately** with the provider;
2. Decide whether to **suspend or terminate** the placement until concerns are resolved; and
3. Report issues to relevant external agencies (e.g., Tower Hamlets Safeguarding Children Partnership, Local Authority Attendance Team, or the Police) as appropriate.

The DSL will record all actions, communications, and outcomes in the pupil's safeguarding file.

22.4 Ongoing Oversight

Gatehouse School ensures continuous communication between:

- the **DSL** and the **provider's safeguarding lead**;

- the **form teacher** and **parent/carer**; and
- relevant **external professionals**, such as social workers or virtual-school representatives.

The Headteacher provides **termly reports** to the Governing Body summarising alternative-provision arrangements, attendance, and safeguarding assurance.

23. Extended School and Off-Site Arrangements

Gatehouse School recognises that safeguarding responsibilities extend beyond the school site and normal hours of operation.

All **extended school activities**, including after-school clubs, enrichment sessions, residential visits, educational day trips, sporting events, and work-related experiences, are planned and managed in accordance with *Keeping Children Safe in Education (2026)* and the *Health and Safety: Advice on Legal Duties and Powers (DfE)* guidance.

The School's **Child Protection Policy and safeguarding procedures apply at all times** when pupils are under the supervision or direction of school staff.

23.1 Risk Assessment and Approval

- Every off-site activity or extended-school event must have a **written risk assessment** that identifies potential hazards, control measures, and emergency arrangements.
- Risk assessments are prepared by the lead staff member, reviewed by all accompanying staff, and **signed and dated** prior to departure.
- The completed document must be **countersigned by the Headteacher** or a **delegated senior leader**, and stored in the trip file.
- The Health and Safety Coordinator, Conti Moll oversees the risk-assessment process, ensuring that all visits comply with school policy, local authority guidance, and national best practice.
- Staff must carry contact details for the DSL and emergency services, and record any incidents or concerns using the school's safeguarding reporting procedures.
- The school will consider safeguarding risks arising from the particular location, activity, provider, accommodation, transport arrangements, staffing and supervision arrangements.
- Risk assessments will take account of the individual needs and vulnerabilities of participating pupils, including SEND, medical needs and any known safeguarding concerns.

23.2 Residential Visits

For all residential visits, a Designated Safeguarding Lead (DSL) or Deputy DSL must be contactable and available at all times.

Wherever possible, a DSL or Deputy DSL will attend in person, particularly when EYFS or younger pupils are participating, to ensure that safeguarding and welfare arrangements are maintained.

Risk assessments for residential visits must include:

- supervision ratios and sleeping arrangements;
- medical needs and medication management;
- online-safety considerations (e.g., technology use);
- emergency contact procedures; and
- plans for managing homesickness, illness, or accidents.

Staff on residential visits are expected to model professional conduct at all times, follow the Staff Code of Conduct, and record and report any safeguarding concerns immediately to the DSL.

23.3 External Services and Off-Site Providers

Where services or activities are organised by external organisations, the school requires written assurance that:

- the provider has appropriate safeguarding and child-protection policies consistent with *KCSIE 2026*;
- all staff and volunteers have undergone appropriate safer-recruitment and suitability checks in accordance with the requirements applicable to their role and activity, including the appropriate DBS check and Children's Barred List check where the role constitutes regulated activity; and
- staff receive training in recognising and responding to abuse, online safety, and reporting concerns.

A volunteer who is undertaking regulated activity with children must have the appropriate enhanced DBS check with Children's Barred List information. From 1 September 2026, the removal of the supervision exemption means that volunteers undertaking regulated activity cannot rely on supervision by another person to avoid the regulated activity requirements.

This requirement applies whether or not the children attending are currently on the school roll.

The safeguarding standards expected of external organisations are set out in the DfE guidance *Keeping Children Safe in Out-of-School Settings: Safeguarding Guidance for Providers* (February, 2026)

- All safeguarding requirements are clearly written into **lease agreements, hire contracts, or partnership arrangements**, and failure to comply may result in the termination of the agreement.
- For EYFS pupils, the school confirms that external providers meet all statutory welfare requirements, maintain suitable **adult-to-child ratios**, and **implement age-appropriate safeguarding and supervision measures**.

23.4 Accountability and Oversight

The **Headteacher** retains overall responsibility for the welfare of pupils during all extended and off-site activities.

The **DSL** and **Health and Safety Coordinator** jointly review safeguarding practice for off-site provision after each trip, ensuring lessons learned from previous visits inform future planning.

All safeguarding incidents or near-misses must be logged and reviewed to evaluate the effectiveness of current procedures.

24. Identifying and Recognising Abuse

All staff must be alert to the signs of abuse, neglect, and exploitation so that they can identify children who may need help or protection.

- If any member of staff is unsure, they must speak immediately to the **Designated Safeguarding Lead (DSL)** or a **Deputy DSL**
- Staff must record concerns using **CPOMS** (or the school's designated safeguarding system) and follow agreed procedures without delay.
- Abuse can be perpetrated by adults or other children (child-on-child abuse) and can occur **online or offline**, or a combination of both.
- Staff must also consider **contextual safeguarding**, recognising that harm can occur **outside the home**—for example, in friendship groups, neighbourhoods, or online environments.

(*KCSIE 2026* highlights that serious bullying, including cyberbullying, constitutes a safeguarding concern if it causes or is likely to cause significant harm.)

24.1 Definition of Abuse

Abuse and neglect are forms of maltreatment. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.

Harm may include physical, emotional, sexual, or neglectful ill-treatment and the impact of witnessing the ill-treatment of others, such as domestic abuse.

Children may be abused in family, institutional, or community settings, or online, by people known to them or by strangers.

24.2 Categories of Abuse

Physical Abuse

- May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm
- Physical harm can also occur when a parent or carer fabricates or induces illness
- *EYFS staff must be especially alert to unexplained injuries or developmental delays.*

Emotional Abuse

- Persistent maltreatment that severely affects emotional development
- This may include making a child feel worthless or unloved, imposing age-inappropriate expectations, overprotection, isolation, serious bullying or cyberbullying, or exposing a child to the ill-treatment of others
- *Some level of emotional abuse is present in all types of maltreatment.*

Sexual Abuse

- Forcing or enticing a child to take part in sexual activities—physical or non-contact—whether or not the child understands what is happening.
- This includes grooming, exposure to sexual images, or encouraging sexualised behaviour.
- Abuse may occur **online or offline**, and can be perpetrated by **males, females, or other children**.
- Further guidance is available from the *Centre for Expertise on Child Sexual Abuse*.

Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs, leading to serious impairment of health or development. Examples include:

- Failure to provide adequate food, clothing, or shelter (including exclusion from home or abandonment)
- Lack of supervision or inadequate caregiving (adequate food, clothing, or shelter) (including for EYFS pupils)
- Failure to protect a child from physical or emotional harm or danger
- Failure to seek appropriate medical care or treatment
- Neglect of, or unresponsiveness to, a child's basic emotional needs

Neglect may begin prenatally (e.g., due to maternal substance misuse).

The DSL and EYFS team refer to the LBTH Neglect Guidance Toolkit to support identification, assessment, and response to neglect.

24.3 Other Safeguarding Concerns

Staff must also be alert to the following issues (defined in Appendix 3 and in *KCSIE 2026*, Part 1 & Annex A):

- Children missing from or absent in education (including EYFS pupils)
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE) and County Lines
- Domestic Abuse (including coercive control)
- Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)
- Forced Marriage
- Radicalisation and Extremism
- Child-on-Child Abuse and Harmful Sexual Behaviour
- Sexual Violence and Harassment (including upskirting)
- Online abuse, cyber-exploitation, and exposure to harmful content

24.4 Possible Indicators of Abuse

The presence of one or more indicators does not confirm abuse, but may warrant further investigation. Staff should look for patterns or combinations of signs, including:

- Direct disclosure or indirect hinting at abuse
- Injuries that are frequent, unexplained, or unusual in location or pattern
- Extreme or sudden changes in behaviour or mood
- Fear of certain people, avoidance of home, or reluctance to go home
- Neglect indicators such as hunger, poor hygiene, or inadequate clothing
- Emotional withdrawal, flinching, or fear of touch
- Delayed emotional or physical development (especially in EYFS pupils)
- Fear of online contact or avoidance of devices following exposure to harmful content

24.5 Contextual Safeguarding

Gatehouse School adopts a **Contextual Safeguarding** approach, recognising that children can be at risk of abuse and exploitation in social, peer, community, or online contexts.

Staff must assess and record risks that occur **outside the family environment**—including serious youth violence, exploitation, or digital harms—and work with relevant agencies to reduce those risks.

DSLs receive ongoing training from the **Tower Hamlets Exploitation Team** on the *Beyond Referrals* and *Contextual Safeguarding* toolkits.

For **EYFS pupils**, staff must also consider age and developmental stage, ensuring appropriate supervision, language support, and adapted safeguarding measures both on- and off-site.

24.6 Further Guidance

For more detailed advice, staff should refer to:

- **Tower Hamlets Safeguarding Children Partnership (THSCP)** – local protocols and toolkits
 - **DfE (2026): Keeping Children Safe in Education**
 - **DfE (2015): What to Do If You're Worried a Child Is Being Abused**
 - **LBTH Neglect Guidance Toolkit**
 - **NSPCC** – safeguarding guidance, research, and training resources
 - **Centre of Expertise on Child Sexual Abuse** – guidance on communicating with children and families
 - **EYFS Statutory Framework (2024)** – welfare requirements and developmental indicators
 - **Working Together to Safeguard Children (2023, updated 2024)**
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25. Voice of the Child

Gatehouse School believes that every child has the right to be heard, taken seriously, and supported to express their views and experiences safely.

All staff with safeguarding responsibilities must recognise that it often takes **great courage** for a child to share a concern or disclose abuse, particularly in cases of **child sexual abuse** (*KCSIE 2026* emphasis).

25.1 Barriers to Disclosure

Children may be unable or reluctant to articulate what they are experiencing because they:

- feel **embarrassed, ashamed, or afraid** of not being believed;
- fear the **consequences** or threats made by the perpetrator;
- lack the **language or emotional vocabulary** to describe what has happened;
- are unaware that their experience **constitutes abuse**; or
- have **additional vulnerabilities**, such as disability, developmental delay, or limited English proficiency.

For **EYFS pupils**, communication may occur through **play, behaviour, or non-verbal cues** rather than spoken words.

Staff must therefore exercise **professional curiosity**, recognising that behavioural changes, withdrawal, aggression, or “acting out” may signal distress or abuse.

25.2 Staff Responsibilities

All staff must:

- listen carefully and **believe the child** when a concern is raised.
- avoid asking leading questions or promising confidentiality.
- record and report concerns promptly to the **Designated Safeguarding Lead (DSL)** using the school's recording system;
- reassure the child that their disclosure will be taken seriously and acted upon;
- maintain a **trauma-informed and relationship-based approach** to communication; and
- be alert to subtle signs that a child may be attempting to communicate discomfort or harm.

Staff must be familiar with and promote the **systems in place for pupils to report concerns**, ensuring that every child knows how to seek help and feels safe to do so.

25.3 School Systems for Pupil Voice

In line with *KCSIE 2026 Part 2*, Gatehouse School maintains multiple accessible and well-promoted systems that enable children to share worries and seek help. These include:

- **Form time** discussions, **buddy** and **house** systems;
- **Mentor, Learning Leader, Play Leader, and Reading Leader** roles;
- **Year 6 Subject Ambassadors** and **Wellbeing Ambassadors**;
- **School Council** and **Pupil Leadership Team**;
- open access to **DSL team members**, the **Head of Pastoral Care**, and the **School Nurse** during breaks and lunchtimes;
- **Regular pupil surveys** and wellbeing check-ins; and
- a whole-school ethos that encourages pupils to **speak to any trusted adult** whenever they feel unsafe or worried.

For **EYFS children**, staff are trained to observe **non-verbal communication**, emotional regulation, and patterns of play that may indicate unmet needs or safeguarding concerns.

25.4 Commitment to Listening

The school continually promotes a culture where children's voices are valued and acted upon. Through assemblies, PSHE lessons, displays, and staff modelling, pupils learn that:

- it is always right to speak up about worries;
- adults will listen and take action; and
- their wellbeing and safety are the school's top priority.

All disclosures and pupil-voice insights are reviewed by the DSL team to ensure patterns of concern are identified and addressed promptly.

26. Safeguarding Issues

Children can experience a wide range of safeguarding concerns, many of which may be **complex, overlapping, and interrelated**.

Staff must recognise that risks can involve **physical, emotional, sexual, or online abuse, neglect, exploitation**, or other **emerging forms of harm**.

All staff are expected to apply **professional curiosity** and **vigilance** when observing, recording, and responding to concerns, taking into account each child's **age, developmental stage, and individual vulnerabilities**.

This includes recognising that **EYFS pupils** and younger children may express distress or disclose harm through **play, changes in behaviour, or non-verbal cues** rather than direct speech.

Gatehouse School adopts a **whole-school approach** to safeguarding that considers the **cumulative impact** of multiple risks and promotes early intervention to prevent harm and protect wellbeing.

The following subsections outline specific safeguarding concerns and provide guidance to help staff **identify, respond to, and report** these issues effectively in line with:

- *Keeping Children Safe in Education (2025)*
 - *Working Together to Safeguard Children (2023)*
 - *Tower Hamlets Safeguarding Children Partnership* procedures.
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27. Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) is a form of **child sexual abuse**. It occurs where an individual or group takes advantage of an **imbalance of power** to coerce, manipulate, or deceive a child into sexual activity:

- in exchange for something the victim needs or wants; and/or
- for the financial advantage or increased status of the perpetrator or facilitator.

A child may be sexually exploited even when the sexual activity appears consensual.

Exploitation can occur both **online and offline**, and over time or as a **single incident**. Children may be unaware that they are being exploited, particularly if they believe they are in a genuine relationship.

27.1 Vulnerability Factors

Although any child can be a victim of CSE, certain factors may increase vulnerability, including:

- age and developmental immaturity;
- gender or sexual identity;
- cognitive ability or learning difficulties;
- communication barriers or language needs;
- physical strength or disability;
- social isolation or low self-esteem;
- limited access to financial or emotional support;
- dependency in **EYFS pupils**, including reliance on adults for care and understanding of social boundaries.

CSE can also be child on child, with children exploiting other children. In such cases, the perpetrator may themselves be a victim and must also receive appropriate support.

27.2 Forms of CSE

CSE can include both **contact** and **non-contact** forms of sexual activity, such as:

- involvement in producing sexual images or videos;
- forcing children to view sexual content or witness sexual acts;
- encouraging sexually inappropriate behaviour;
- grooming, including online grooming through social media, gaming, or messaging platforms; and
- sharing or distributing sexual images without consent.

Abuse may occur without the child's immediate awareness – for example, when indecent images or videos are copied, shared, or sold online.

27.3 Possible Indicators of CSE

Staff must remain alert to the following potential warning signs (this list is not exhaustive):

- possession of **multiple phones** or devices;
- anxiety about receiving or checking messages;
- **sudden behavioural changes**, agitation, or aggression;
- relationships with **significantly older individuals**;
- **unexplained gifts**, money, or new possessions;
- **frequent absence** from school or reluctance to attend;
- attempts to **leave school premises** during the day;
- sexually transmitted infections (STIs) or pregnancy;
- **drug or alcohol misuse**;
- association with peers involved in exploitation;
- **emotional withdrawal** or low mood;
- **going missing** or returning home late;

- in **EYFS pupils**, unexplained distress, clinginess, regression, or withdrawal from trusted adults or familiar routines.

Any concern, however small, must be reported **immediately to the DSL** or a Deputy DSL.

27.4 Prevention and Support

- CSE awareness and prevention are embedded in the **PSHE and RSE curriculum**, including **age-appropriate teaching** for EYFS pupils on **personal safety, boundaries, and trusted adults**.
 - Staff are encouraged to consult the **Home Office Statutory Guidance on Child Sexual Exploitation**, the **Children's Society resources**, and *KCSIE 2026* Part 5 for detailed definitions and response procedures.
 - The DSL will coordinate support for any identified victim, liaising with the **Tower Hamlets Exploitation Team, Children's Social Care**, and **Police** as appropriate.
 - EYFS practitioners must remain alert to **early signs of grooming or inappropriate adult attention** and report any concerns to the DSL **without delay**.
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28. Child Criminal Exploitation (CCE) including County Lines

Child Criminal Exploitation (CCE) is a form of abuse that occurs when an individual or group takes advantage of an **imbalance of power** to **coerce, control, manipulate, or deceive** a child into criminal activity:

- in exchange for something the child needs or wants; and/or
- for the **financial or other advantage** of the perpetrator or facilitator; and/or
- through **violence or threats of violence**.

A child may be criminally exploited even when the activity appears **voluntary or consensual**. CCE can occur both **in person and online**, and does not always involve physical contact.

Children involved in criminal exploitation often commit crimes themselves, which can obscure their vulnerability as victims. Both **girls and boys** are at risk, and those who are criminally exploited are also at higher risk of **sexual exploitation**.

28.1 Forms of CCE

CCE can take many forms, including but not limited to:

- being **coerced into transporting drugs or money** across counties ("County Lines");
- being **forced to work in cannabis factories** or illegal enterprises;
- involvement in **theft, shoplifting, or pickpocketing**;

- being pressured to **carry weapons** for protection or intimidation;
- **threatening or committing violence** on behalf of others; or
- **online recruitment** through gaming, social media, or encrypted messaging.

Children can become trapped by threats, coercion, or debt, and may be manipulated into believing they are responsible for repaying money or protecting others.

28.2 Possible Indicators of CCE

Staff must be vigilant for possible signs of criminal exploitation, including:

- Possession or unexplained access to mobile phones or SIM cards (including outside school, as the school has a no-phone policy)
- secrecy or anxiety when using devices;
- **sudden behavioural changes**, agitation, or withdrawal;
- **unexplained gifts, money, or clothing**;
- attempts to **leave school premises** during the day;
- **frequent absences** or refusal to attend school;
- association with **older peers or known exploiters**;
- **drug or alcohol misuse**;
- **going missing** or returning home late; or
- **emotional distress** or significant mood changes.

28.3 County Lines

“County Lines” is a specific form of criminal exploitation in which gangs or organised networks exploit children and vulnerable adults to **transport, store, and sell drugs**- often using **dedicated phone lines** (“deal lines”). This can take place locally or across the country.

Children are targeted and recruited in a range of settings, including:

- schools, colleges, and pupil referral units;
- children’s homes and care placements; and
- online platforms and gaming communities.

County Lines operations typically involve **coercion, intimidation, violence (including sexual violence), and weapons** to ensure compliance.

Victims are often controlled through **manufactured debts**, threats to themselves or their families, or **cuckooing**—where their home or another property is taken over by exploiters.

28.4 Additional Indicators of County Lines Involvement

Staff should be alert to children who:

- go missing and are later found in **unfamiliar locations**;
- are victims or perpetrators of **serious youth violence** (e.g., knife crime);

- receive or handle **requests, money, or drugs** for others;
- show awareness or experience of **‘plugging’** (internally concealing drugs);
- are found in **accommodation not linked to their family**, such as hotels or trap houses;
- have **bank accounts used for criminal activity**; or
- owe a **“debt bond”** to exploiters.

28.5 Prevention, Support, and Reporting

- Gatehouse School raises awareness of CCE and County Lines through **PSHE, RSE, and assemblies**, focusing on recognising coercion, peer pressure, and grooming.
- Staff should refer to the **Home Office County Lines Guidance (2023)**, **The Children’s Society Toolkit for Professionals**, and **Metropolitan Police resources on Cuckooing** (available in English, Bengali, and Somali via the Tower Hamlets Council website).
- When a child is at risk of exploitation, staff must immediately inform the **DSL**.
- The DSL will consider completing the **Tower Hamlets Exploitation Screening Tool** and, if required, refer to **MAST (Multi-Agency Safeguarding Team)** or the **Tower Hamlets Exploitation Team** for assessment.
- For **children under 10 years old** (below the age of criminal responsibility), any indication of exploitation must be treated as a **child protection concern** and referred **immediately** to the DSL.

29. Serious Youth Violence

Gatehouse School recognises that, while serious youth violence is more common among older pupils, primary-aged children may still be exposed to, affected by, or show early signs of distress linked to violent environments. Our approach focuses on **early identification, prevention and support**, ensuring children feel safe and able to talk about their worries.

Under the **Serious Violence Duty (2022)**, schools are expected to work with local partners - including the police, health and social care - to help prevent and reduce serious violence in their communities.

29.1 Recognising Early Warning Signs

All staff are trained to remain alert to behaviours or situations that may suggest a child is experiencing or witnessing violence. Possible indicators include:

- Unexplained injuries or frequent accidents;
- Sudden changes in mood, confidence or behaviour;
- Increased anxiety, withdrawal or aggression;
- Fear of certain peers or adults;

- Changes in friendships or social groups;
- Possession of items or money that cannot be explained.

Staff should apply **professional curiosity**, recognising that such signs may overlap with other safeguarding concerns, including **child criminal exploitation (CCE)**, **county lines**, or **domestic abuse**.

29.2 EYFS and Younger Pupils

In the Early Years and lower primary years, patterns such as aggression in play, reluctance to engage, or repeated talk about violence may indicate exposure to distressing experiences. Practitioners observe carefully, share concerns promptly, and work closely with families to provide early support.

29.3 Prevention and Support

Gatehouse School takes a **preventative and educational approach** through:

- A **PSHE and RSHE curriculum** promoting empathy, respect, resilience and conflict resolution;
- **Assemblies and workshops** that build understanding of positive friendships, safe choices and managing emotions;
- **Close collaboration** with local safeguarding partners, including the **Tower Hamlets Multi-Agency Safeguarding Team (MAST)** and **Early Help** services;
- Ongoing **staff training** on recognising emerging risks and responding appropriately.

29.4 Reporting and Response

All concerns about possible exposure to violence must be reported immediately to the **DSL or a Deputy DSL**. Staff must not investigate themselves.

The DSL will assess the information and, where appropriate, make a referral to **MAST, Early Help**, or other relevant agencies. Parents and carers will be involved where it is safe and appropriate to do so.

Early identification and effective communication are key to safeguarding all pupils and preventing future harm.

30. Online Safety

Gatehouse School recognises that the internet and digital technologies are an integral part of children's lives and can provide significant educational, social, and developmental benefits. However, children may also be exposed to risks of harm online, including abuse,

exploitation, bullying, harassment, inappropriate or illegal content, harmful communications, manipulation, misinformation, and contact with individuals who may pose a risk to them.

The school adopts a whole-school approach to online safety. Online safeguarding forms part of the school's wider safeguarding arrangements and is addressed through education, appropriate supervision, filtering and monitoring, staff training, acceptable-use arrangements, and effective reporting and response procedures.

All staff must understand that online safeguarding concerns are safeguarding concerns and must be reported to the Designated Safeguarding Lead (DSL) in accordance with this policy.

30.1 Online Risks

The school recognises that online risks may include:

- exposure to inappropriate, harmful, violent or illegal content;
- online bullying, harassment and discriminatory behaviour;
- sexual harassment and sexual violence;
- grooming and exploitation;
- coercion, manipulation and blackmail;
- child sexual exploitation (CSE) and child criminal exploitation (CCE);
- sharing of nude, semi-nude, indecent or otherwise inappropriate images;
- non-consensual sharing of images;
- digitally altered or manipulated images;
- AI-generated images, including deepfakes;
- harmful or abusive content created or distributed using artificial intelligence;
- contact with unknown adults or other individuals who may seek to exploit children;
- online radicalisation and extremist content;
- excessive or inappropriate use of digital devices and online services;
- risks associated with social media, gaming, messaging services and other online platforms; and
- risks arising from emerging technologies and applications.

Staff should recognise that online harm may occur alongside, contribute to, or be an extension of abuse or harm occurring offline.

30.2 Artificial Intelligence and Generative AI

The school recognises the increasing use of artificial intelligence and generative AI by children and adults.

AI may create additional safeguarding risks, including the production or manipulation of images, audio or video involving children. Images may be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as **deepfakes**.

The school will:

- educate pupils about the safe, responsible and appropriate use of artificial intelligence;
- ensure staff understand the safeguarding risks associated with generative AI;
- consider AI-related risks within online-safety education, risk assessments and safeguarding procedures;
- respond to AI-generated or digitally manipulated sexualised, indecent or semi-indecent images as a safeguarding concern;
- ensure that concerns involving the creation, possession or sharing of illegal images are reported immediately to the DSL;
- ensure staff do not intentionally view, copy, save, download or share illegal images of children;
- provide appropriate support to children who are victims of AI-generated, manipulated or otherwise abusive content; and
- work with parents/carers and relevant agencies where further safeguarding action is required.

The school will also ensure that the use of generative AI for educational purposes is undertaken safely and appropriately, in accordance with the school's relevant technology, acceptable-use and data-protection arrangements.

30.3 Filtering and Monitoring

The school uses filtering and monitoring systems to help protect pupils from accessing harmful or inappropriate online content.

Filtering and monitoring arrangements will be:

- appropriate to the age and needs of pupils;
- applied to relevant internet-connected devices and locations;
- regularly tested and reviewed;
- understood by staff responsible for safeguarding and IT;
- responsive to emerging online risks; and
- supported by clear procedures for reporting and responding to concerns.

The effectiveness of filtering and monitoring arrangements will be **reviewed at least once every academic year, in accordance with the requirements of KCSIE 2026.**

The review will be led by the appropriate member of the senior leadership team, with input from the DSL and relevant IT/digital staff. The review will consider whether filtering and monitoring remain effective across the school's relevant devices, systems and locations and whether any weaknesses or gaps require action.

The outcome of the annual filtering and monitoring effectiveness review will be formally recorded and retained by the school. The record will identify the date of the review, those involved, the effectiveness of the arrangements, any weaknesses or gaps identified, and the actions required to address them. Actions will be monitored

to completion and the record will be available as evidence of the school's annual review process.

The DSL will maintain appropriate oversight of filtering and monitoring from a safeguarding perspective and will ensure that identified safeguarding risks are addressed.

30.4 Mobile Phones and Personal Devices

Gatehouse School recognises that mobile phones, smart watches and other personal or connected devices can create safeguarding risks, particularly where they have camera, recording, communication, internet or social-media functions.

The school will maintain and implement a whole-school Mobile Phone Policy, which forms part of the school's wider safeguarding arrangements. The policy will apply consistently across the school and will set out clear expectations for pupils, staff, volunteers and visitors regarding the possession, storage and use of mobile phones and personal devices.

The school will maintain clear arrangements governing the use of mobile phones and personal devices by pupils, staff, volunteers and visitors.

The school's approach will:

- set out clearly where and when pupils may use mobile phones or personal devices;
- establish expectations for the storage of devices during the school day;
- prohibit the inappropriate photographing, filming or recording of children or staff;
- address the use of devices to access, create or share inappropriate or harmful content;
- address the use of messaging, social media and other communication applications where these create safeguarding concerns;
- provide clear procedures for responding when a device is misused;
- take account of pupils who may have legitimate medical, accessibility or safeguarding reasons for requiring access to a device; and
- apply appropriate arrangements during educational visits and other activities outside the school premises.

The whole-school Mobile Phone Policy will be communicated to pupils, staff and parents/carers and will be reviewed regularly to ensure that it remains effective, proportionate and consistent with current safeguarding requirements.

Staff must follow the school's Staff Code of Conduct and relevant mobile-phone acceptable-use procedures when using personal devices.

Personal mobile phones and other personal devices must not be used in classrooms or outdoor learning areas except where specifically authorised in accordance with the school's safeguarding procedures.

Staff Expectations

- Personal devices are password-protected and remain the user's responsibility.
- Staff must not use personal devices to photograph, video, or contact pupils.
- School devices are used in accordance with the Staff Code of Conduct.
- Mobile phones are secured during lessons; smartwatches are not permitted.

Pupil Expectations

- Only Year 6 pupils walking home alone may bring phones; these are handed in at Reception each morning.
- Pupils are taught safe, respectful, and responsible technology use.

Breaches

- Staff breaches follow the Staff Code of Conduct and Managing Allegations Policy.
- Any illegal content or behaviour is reported immediately to the LADO and Police.

30.5 Online Safety Education

Online safety education is embedded within the curriculum and wider pastoral provision.

Pupils are supported to:

- understand how to use technology safely and responsibly;
- recognise online abuse, exploitation, grooming, bullying and harassment;
- understand the risks associated with sharing personal information and images;
- understand the risks associated with sharing nude or semi-nude images;
- recognise that images and other content can be manipulated or generated using artificial intelligence;
- understand how to report concerns and seek help;
- develop resilience and critical-thinking skills when assessing online information and content; and
- understand the potential consequences of harmful or inappropriate online behaviour.

Parents and carers are provided with appropriate information and guidance to support safe use of technology at home.

30.6 Reporting and Safeguarding Response

All online-safety concerns must be reported to the DSL or Deputy DSL and managed in accordance with the school's safeguarding procedures.

Staff must recognise that online abuse may be continuous, anonymous and pervasive and may occur alongside offline harm. Vulnerable pupils, including those with SEND, children looked after or previously looked after, and children known to social care, may face heightened online risks.

Where an online incident involves potentially illegal images of a child:

- staff must not intentionally view, download, save, copy or forward the image;
- staff must report the concern immediately to the DSL;
- the DSL will determine the appropriate safeguarding response and whether advice or referral to external agencies is required; and
- relevant evidence must be handled securely and in accordance with safeguarding and data-protection procedures.

All online safeguarding incidents will be appropriately recorded and reviewed by the DSL to identify patterns, recurring risks and any need for additional support, education, training or changes to the school's online-safety arrangements.

30.7 Online and Remote Learning

To safeguard pupils during online or hybrid learning:

- **All live lessons** are recorded and stored securely.
- Pupils are **admitted individually** from waiting rooms to verify identity.
- **1:1 sessions** take place only during school hours and with parental awareness and consent.
- **Group sessions** must include at least two pupils.
- Backgrounds must be **neutral and free from personal content**.
- Staff maintain **professional attire and conduct**.
- **School-managed accounts and devices** are used wherever possible.
- Online learning occurs between **07:00 – 18:00** unless authorised.
- Parents receive guidance on **supervision and parental controls**.

These expectations form part of the **Online Safety Risk Assessment**, reviewed regularly by the DSL in line with *KCSIE 2026* and *EYFS* welfare requirements.

30.8a Roles and Responsibilities

Role	Responsibilities
Governing Body	Approves and reviews the Online Safety Policy; ensures compliance; liaises with the Headteacher, DSL, and IT provider.
DSL	Leads implementation; delivers staff training; manages incidents; liaises with LADO, ICT and external agencies.
IT Service Provider (Vizst)	Maintains secure infrastructure; manages filtering/monitoring; provides reports; ensures off-site device monitoring.

Teaching & Support Staff	Model safe use; report concerns; embed online-safety teaching across the curriculum.
Parents / Carers	Reinforce safe use at home; engage with school guidance, workshops, and campaigns.

30.8b Reporting and Safeguarding

- All online-safety concerns must be **reported to the DSL** as part of the school's safeguarding process.
- Vulnerable pupils (SEND, LAC, PLAC, or known to a social worker) may face **heightened online risk**.
- Staff must recognise that online abuse can be **continuous, anonymous, and pervasive**, and may coincide with offline harm.
- The school undertakes **ongoing risk assessments** of filtering, monitoring, and mobile-device use to ensure safeguards remain proportionate and effective.

This section forms part of the school's wider safeguarding arrangements and must be read alongside the Online Safety Policy, Acceptable Use Agreements, and Positive Behaviour Policy, which together provide the operational framework for safe and responsible use of technology across the school.

30.7 Linked Policies and Procedures

This section should be read alongside:

- **Online Safety Policy**
- **Mobile Phone Policy**
- **Acceptable Use Policy/Agreements**
- **Staff Code of Conduct**
- **Child-on-Child Abuse Policy**
- **Behaviour Policy**
- **Data Protection and Information Security arrangements**
- **AI/generative AI guidance**, where applicable.

The school will review its online-safety arrangements regularly and will update policies, training and safeguarding procedures in response to changes in technology, emerging risks, incidents within the school and updates to statutory guidance.

31. Domestic Abuse

The **Domestic Abuse Act 2021** recognises that **children are victims in their own right** if they see, hear, or experience the effects of domestic abuse.

Domestic abuse may occur in any relationship - including between family members, ex-partners, or others who are *personally connected* - and is **not limited to the family home**. It may involve a **single incident or a pattern** of abusive behaviour that includes:

- physical, sexual, emotional, or economic abuse; and/or
- **coercive or controlling behaviour** designed to isolate, intimidate, or dominate another person.

Both the perpetrator and the victim must be **aged 16 or over** and personally connected.

31.1 Impact on Children

All children can be adversely affected by domestic abuse, whether they directly witness it or experience its consequences. Domestic abuse can have **profound and long-term effects** on a child's:

- emotional and psychological wellbeing,
- physical health and development, and
- learning, behaviour, and social relationships.

Children may experience guilt, fear, or confusion, and may blame themselves. Abuse in their own intimate relationships - **child-on-child abuse** - is also recognised within *KCSIE 2026*.

Children with **additional vulnerabilities** (SEND, LAC, PLAC, or known to social care) may face increased risk of harm.

31.2 School Response and Safeguarding Measures

- **All concerns** involving domestic abuse must be reported immediately to the **Designated Safeguarding Lead (DSL)**.
- The DSL will contact **Children's Social Care** or the **Multi-Agency Safeguarding Hub (MASH)** for advice and guidance.
- Where appropriate, a **DASH Risk Assessment** may be completed to assess the level of risk to the victim.
- The DSL ensures that information is recorded and shared appropriately with other professionals, following *KCSIE 2026* and *Information Sharing (2024)* guidance.

Operation Encompass

Gatehouse School participates in [Operation Encompass](#), a national police-school safeguarding partnership. If police attend a domestic abuse incident where a child is present, the **DSL is notified before the child arrives at school the following day**. This enables the

school to provide **silent, trauma-informed support** and, where necessary, liaise with **Children's Social Care** or the **VAWG Team**.

Support and Partnership Working

- The school maintains contact with the **Tower Hamlets Violence Against Women and Girls (VAWG) Team**, which offers professional advice, parent workshops, and staff training.
 - Prevent Training Officer: **Amy-Kate.Garwood2@towerhamlets.gov.uk**
- The school promotes the **VAWG Pledge** and encourages engagement with community initiatives tackling abuse.
- Pupils affected by domestic abuse are supported through pastoral provision, counselling referrals, and trusted-adult relationships.

31.3 Staff Responsibilities

- Recognise and respond to the **signs of domestic abuse**, in line with *KCSIE 2026 Part 1 and Annex A*.
- Understand that abuse may occur **online, offline, or both**, amplifying emotional harm.
- Report **all concerns immediately** to the DSL; do not investigate independently.
- Adopt a **trauma-informed, child-centred approach** when supporting victims.
- Early Years practitioners must be particularly alert to **developmental or behavioural indicators** of abuse and respond appropriately.

31.4 Whole-School Approach

Domestic abuse awareness is embedded- through teaching about safe relationships, personal safety, and recognising signs of distress - within the school's **safeguarding training, curriculum (PSHE and RSE), and staff induction**.

Gatehouse School aligns with the **EYFS Statutory Framework (2025)** to ensure that practitioners recognise and act on early signs of distress or harm in young children.

Regular review of this section ensures alignment with the **Tower Hamlets Safeguarding Children Partnership** guidance.

32. So-Called Honour-Based Abuse (HBA)

So-Called Honour-Based Abuse (HBA) refers to incidents or crimes committed to protect or defend the perceived *honour* of a family or community. HBA can involve a **network of family or community pressure** and often includes multiple perpetrators. All forms of HBA are **abuse**, are **illegal in the UK**, and must be treated as **safeguarding concerns**. Examples, may include:

- **Female Genital Mutilation (FGM)**
- **Forced Marriage**
- **Other harmful practices**, such as breast-ironing, virginity testing, or hymenoplasty

32.1 Female Genital Mutilation (FGM)

FGM is a **criminal offence** under the *Female Genital Mutilation Act 2003*.

Statutory guidance: *HM Government Multi-Agency Statutory Guidance on FGM* (updated 2020).

Teachers' statutory duty (Section 5B, FGM Act 2003, as amended by the Serious Crime Act 2015):

- Teachers must report **direct disclosure or visual evidence** that FGM appears to have been carried out on a girl under 18 directly to the **police**.
- The teacher must then **inform the DSL** that a report has been made.
- Teachers must **not examine** pupils; visual evidence is rare.

The duty **does not apply** to:

- at-risk or suspected cases without disclosure or visual evidence; or
- cases involving women aged 18 or over.

In such cases, staff must follow the **school's safeguarding procedures** and report concerns to the DSL.

32.2 Forced Marriage

Forced marriage is a **criminal offence** under the *Anti-Social Behaviour, Crime and Policing Act 2014*. Since 2023, it is also illegal to **cause a child to marry before 18**, even without coercion or threats. This includes **religious or unofficial ceremonies** as well as legal marriages.

Staff must remain alert to signs of forced marriage (such as sudden travel plans, withdrawal from education, or family control of communications) and **report all concerns immediately to the DSL**.

Advice and support:

- Forced Marriage Unit (FMU) – 020 7008 0151 | fmu@fcdo.gov.uk
- *The Right to Choose: Statutory Guidance and Multi-Agency Guidelines* (April 2023)

32.3 Virginity Testing and Hymenoplasty

It is illegal to carry out, offer, or assist in **virginity testing** or **hymenoplasty**, including by UK nationals abroad (*Health and Care Act 2022*). Any suspicion or disclosure must be **reported**

to the **DSL**, who will follow the *Virginity Testing and Hymenoplasty: Multi-Agency Guidance* (July 2022).

32.4 Professional Responsibilities

All staff must be alert to the possibility that a child may be **at risk of, or have already suffered, HBA**.

Concerns must be reported **immediately** to the **Designated Safeguarding Lead (DSL)**, who will follow local safeguarding procedures in line with *KCSIE 2026* and the **Tower Hamlets Safeguarding Children Partnership (THSCP)** guidance.

32.5 Staff Responsibilities

- Recognise that HBA—including FGM, forced marriage, and other harmful practices—is **child abuse**.
- **Report concerns promptly** to the DSL.
- Ensure actions comply with *KCSIE 2026* and local safeguarding procedures.
- Understand that HBA often **intersects with domestic abuse, exploitation, or neglect**.
- EYFS practitioners must remain vigilant to **family pressure, travel plans, or unusual absences**, which may indicate risk.

This section must be read alongside the **Child Protection Procedures**, **Domestic Abuse**, and **Equality and Inclusion** sections of this policy.

33. Radicalisation and Extremism

Children can be vulnerable to extremist ideologies and radicalisation. Protecting pupils from these risks is a **core safeguarding duty**, equivalent to protecting them from other forms of harm.

33.1 Key Terms

- **Extremism** – Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.
- **Radicalisation** – The process through which an individual comes to support terrorism or extremist ideologies.
- **Terrorism** – Any action that causes or threatens serious harm or disruption to influence the government or intimidate the public for political, religious, or ideological purposes.

33.2 Vulnerability Factors

There is **no single indicator** of vulnerability. Risk may be heightened by:

- social isolation or low self-esteem;
- exposure to extremist material (online or in person);
- peer, family, or community influence;
- personal experience of discrimination or marginalisation;
- mental-health or SEND factors that increase susceptibility.

Radicalisation can occur **in any setting**, including schools or online platforms.

33.3 Statutory Guidance

- **Prevent Duty 2023** (updated March 2024) – *Counter-Terrorism and Security Act 2015* (Sections 26 and 29)
- **The Prevent Duty: Safeguarding Learners Vulnerable to Radicalisation** (DfE, October 2022)

Gatehouse School completes and regularly reviews a **Prevent Risk Assessment** and **Prevent Checklist**, identifying pupils potentially vulnerable to radicalisation and ensuring compliance with national and local guidance.

33.4 School Approach

1. Risk Assessment

- Conducted in partnership with the Local Authority and THSCP.
- Considers contextual and online risks relevant to the school community.

2. Staff Training

- All staff undertake **Prevent awareness training** (updated regularly).
- DSLs receive advanced training to manage referrals and liaise with Channel Panel.

3. Curriculum and Pupil Engagement

- British values are embedded across PSHE, RE, and assemblies.
- Pupils explore diversity, tolerance, and respectful dialogue.

4. IT and Online Safety

- Filtering and monitoring systems reduce exposure to extremist content.
- Pupils learn to critically evaluate online material and challenge misinformation.

Local Contacts

- **Prevent Education Officer (Tower Hamlets):** Iona Karrman-Bailey – Iona.Karrman-Bailey@towerhamlets.gov.uk
- **Prevent Referrals:** via the **Multi-Agency Safeguarding Team (MAST)**

33.5 Reporting

All concerns relating to radicalisation or extremist influence must be **reported immediately to the DSL**.

The DSL will refer to the Local Authority Prevent Team or Channel Panel for assessment and support. Staff must not investigate independently.

34. Child-on-Child Abuse (including Harassment and Violence)

Gatehouse School recognises that children can abuse other children, often referred to as child-on-child abuse. It can happen inside or outside school, online or offline, and may involve a single incident or a pattern of behaviour. Such abuse should never be dismissed as *banter*, *part of growing up*, or *having a laugh*.

Abuse is abuse, and Gatehouse School adopts a **zero-tolerance approach**. All staff must maintain a “*it could happen here*” attitude, even if no reports have been made.

Gatehouse School recognises that child-on-child abuse can include behaviour associated with violence against women and girls (VAWG), misogyny, misandry, harmful gender stereotypes, gender-based hostility, sexual harassment, sexual violence and serious violence. The school recognises that these behaviours can be influenced by peer groups, relationships, online content, social media and exposure to harmful or extremist attitudes.

The school will challenge misogynistic, misandrist or otherwise degrading attitudes and behaviours where they contribute to harm, harassment, intimidation, discrimination, violence or the normalisation of abuse. Staff will consider the individual circumstances of each child and will not make assumptions about a child based solely on their sex or gender.

Child-on-child abuse is a safeguarding issue for both the child who has experienced the abuse and the child alleged to have caused the harm. The school will consider the safeguarding needs of both children and recognise that a child who has harmed another child may themselves have experienced abuse, neglect, exploitation or other adverse circumstances. Staff should recognise that child-on-child abuse is preventable and that **early identification and timely, evidence-based support and intervention** may help prevent children from going on to commit further abuse or violence.

Concerns must be reported to the DSL whether the behaviour is believed to have taken place on or off the school site. Staff should also remain alert to times and places when

children may be at increased risk, including immediately before or after the school day and during less supervised periods.

The school will also consider the potential for child-on-child abuse to occur during off-site activities, school transport, residential trips, social activities and through online platforms or social media.

Where concerns relate to serious violence, sexual violence, sexual harassment, harmful sexual behaviour, bullying, VAWG, misogyny, misandry or other forms of child-on-child abuse, staff must report them immediately to the DSL in accordance with this policy.

34.1 Types of Child-on-Child Abuse

Child-on-child abuse can take many forms, including but not limited to:

- **Bullying**, including cyberbullying, prejudice-based or discriminatory bullying
- **Abuse** in intimate personal relationships between children (sometimes known as teenage relationship abuse), including coercive or controlling behaviour, physical abuse, sexual abuse, harassment, or emotional abuse.
- **Physical abuse**, such as hitting, kicking, shaking, biting, hair-pulling, or otherwise causing violence, including where online activity facilitates, threatens or encourages physical abuse
- **Physical assault**, serious violence, threats of violence or harm, including violence involving weapons
- **Sexual violence**, including rape, assault by penetration and sexual assault, including where online activity facilitates, threatens or encourages sexual violence
- **Sexual harassment**, including sexual comments, remarks, jokes and online sexual harassment, whether occurring as a standalone incident or as part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, including forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party
- **Misogyny and misandry**, including language, behaviour or attitudes that demean, threaten, intimidate, sexualise or encourage hostility towards girls, boys, women or men
- **Violence against women and girls (VAWG)**, including sexual violence, sexual harassment, controlling or coercive behaviour, stalking, harassment and abuse within teenage relationships
- **Upskirting**, a criminal offence (taking photos under clothing without consent)
- **Consensual and non-consensual making or sharing of nudes** and semi-nudes, including self-generated intimate images and/or videos, including those generated or manipulated using AI, for example deepfakes
- **Initiation or hazing rituals** that involve harassment, abuse or humiliation, including where there is an online element
- **Prejudice and discrimination**, causing harm due to identity, ability, culture, religion, gender, or sexual orientation

- **Online abuse**, including the sharing of misogynistic or misandrist content, threats, sexualised content, violent material and content that promotes or normalises violence or abuse
- **Harmful sexual behaviour**, including behaviour influenced by pornography, misogynistic online content or other material that distorts understanding of consent, relationships, sex or gender

Gender considerations:

- Girls are statistically more likely to experience sexual assault or exploitation.
- Boys are more likely to experience initiation violence or serious youth violence.
- The school recognises that boys and girls can both be victims or alleged perpetrators of abuse, violence and harassment.
- The school will not assume that VAWG-related behaviour only affects girls or that boys cannot be victims of sexual violence, harassment or relationship abuse.
- The school recognises that child-on-child abuse is not limited to behaviour by boys towards girls and that all children may be affected.

These statistics highlight trends, but they do not mean that boys or girls are immune to other forms of violence, so it is important to keep all risks in mind.

Additional vulnerabilities:

Children with SEND, disabilities, or who are LGB or questioning their gender, or who are perceived to be LGB or questioning their gender, may be at increased risk of harm where they experience bullying, harassment, discrimination, abuse, exploitation or other safeguarding concerns.

EYFS pupils may show signs of distress or harm through **play or behaviour** rather than verbal disclosure.

The school will also consider vulnerabilities associated with exposure to harmful online content, misogynistic or misandrist communities, violent content, pornography, extremist or hateful material, peer pressure and harmful relationship dynamics.

34.2 Recognition and Reporting

Staff should:

- Take all reports seriously and reassure children who report concerns that they will be supported and believed.
- Recognise indicators, including:
 - Changes in mood, behaviour, or friendships
 - Disclosures made indirectly by peers
 - Avoidance of certain individuals or locations
 - Signs of distress during social interactions or online activity
 - Increasingly hostile, degrading or misogynistic/misandrist language or attitudes

- Threats, intimidation, possession or use of weapons, or signs that a child may be involved in serious violence
- Changes in behaviour following exposure to harmful online communities or content
- Report all concerns **immediately to the Designated Safeguarding Lead (DSL)**, whether the concern relates to behaviour taking place on or off the school site.
- Remember that child-on-child abuse is a safeguarding concern for both the child who has experienced the abuse and the child alleged to have caused the harm.

Staff should not dismiss misogynistic, misandrist or violent comments as jokes, banter or simply a difference of opinion where the behaviour creates a safeguarding concern or contributes to a hostile, intimidating or unsafe environment.

Staff should also be alert to the possibility that a child who is alleged to have caused harm may themselves have safeguarding needs and may have experienced abuse, neglect, exploitation or other adverse circumstances.

34.3 Procedures for Handling Allegations

When a pupil reports that they have been harmed by another pupil:

1. **Listen carefully**, avoid judgement, and do not ask leading questions.
2. **Record the disclosure** accurately using the school's safeguarding system (e.g. CPOMS).
3. **Report immediately** to the DSL; staff must not investigate.

The DSL will:

- Contact **Children's Social Care** for advice and guidance.
- Inform the **police** if a criminal offence may have occurred.
- Complete an **immediate risk assessment** for all children involved **and consider the safety and welfare of victims, alleged perpetrators and witnesses**.
- Develop a **safeguarding support plan**, updated as investigations progress.
- Liaise with **CAMHS**, the **school nurse**, or other agencies if required.
- Continue supporting pupils and families during and after any external investigation.
- **Consider whether the incident forms part of a wider pattern of misogyny, misandry, VAWG, harmful sexual behaviour, serious violence, gang-related activity or other contextual safeguarding concerns.**
- **Consider whether online activity, social media, peer groups or exposure to harmful content has contributed to the behaviour or increased the risk of further harm.**
- **Consider the safeguarding needs of the child alleged to have caused the harm as well as those of the child who has experienced the abuse.**
- **Consider whether timely, evidence-based support or intervention is required to reduce the risk of further abuse or violence.**
- **Consider whether the incident forms part of a wider pattern of behaviour and whether there are other children who may be at risk.**

Where serious violence, weapons, threats of violence or significant risk to pupils is identified, the DSL will seek appropriate advice from the Police and/or Children's Social Care without delay.

If a **criminal process** is ongoing, the DSL will work closely with statutory agencies and continue to implement safeguarding and disciplinary measures to keep pupils safe.

34.4 Creating a Supportive Environment

Gatehouse School fosters a culture where pupils understand that **reporting abuse is encouraged and supported**.

To minimise risk and ensure wellbeing, the school will:

- Challenge **sexualised or discriminatory language** immediately.
- **Challenge misogynistic, misandrist, degrading or threatening language and behaviour.**
- Embed education on **respect, consent, and boundaries** through the PSHE and RSE curriculum.
- **Provide age-appropriate education about healthy relationships, gender stereotypes, VAWG, misogyny, respectful behaviour and the impact of harmful online content.**
- **Provide opportunities for pupils, including boys and young men, to understand how harmful gender stereotypes and online misogynistic content can influence attitudes and behaviour.**
- Ensure that pupils know **how to report** concerns in confidence.
- Provide support for victims, **children alleged to have caused harm**, and witnesses, including supervision during transitions or school transport.
- Consider the impact of intra-familial harm and provide coordinated support for siblings.
- Review policies, environment, and curriculum following any incident to prevent recurrence.
- Work with relevant external agencies where serious violence, VAWG, harmful sexual behaviour or other contextual safeguarding risks are identified.
- Ensure that staff challenge inappropriate behaviour between children and do not downplay behaviour as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”.

34.5 Staff Training and Awareness

All staff receive regular safeguarding training, including:

- Recognising **indicators of child-on-child abuse** and sexual harassment, including **harassment and violence**;
- Understanding **trauma-informed and non-judgemental responses**;
- Handling disclosures **sensitively and proportionately**;
- Awareness of **online abuse**, including image sharing and cyberbullying;

- Recognising misogyny, misandry, VAWG, harmful gender stereotypes and attitudes that may contribute to violence or abuse;
- Recognising indicators of serious violence, including threats, weapon carrying, gang involvement or changes in behaviour associated with violent peer groups;
- Recognising **barriers to disclosure** for children with SEND or those identifying as LGBTQ+;
- Immediate reporting procedures to the **DSL** or **deputy DSL**.
- Understanding that child-on-child abuse is a safeguarding issue for both the child who has experienced the abuse and the child alleged to have caused the harm.
- Understanding that timely, evidence-based support can help prevent children from going on to commit further abuse or violence.

34.6 Disciplinary Measures

Where a disciplinary response is appropriate, the school will:

- Take action **alongside external investigations**, not instead of them.
- Avoid any decision that could **prejudice police or social care processes**.
- Consider **all pupils' safety and welfare**, ensuring that sanctions are **proportionate and protective**, not solely punitive.
- **Ensure that disciplinary responses address harmful attitudes and behaviours while recognising that children who display harmful behaviour may themselves have safeguarding needs.**
- **Use appropriate support and intervention alongside disciplinary measures where this may help prevent further abuse or violence.**
- Keep accurate written records of all decisions, actions, and outcomes.

34.7 Whole-School Approach

Child-on-child abuse prevention and response are embedded throughout:

- the **PSHE, RSE, and computing curriculum**,
- education addressing healthy relationships, consent, VAWG, misogyny, misandry, gender stereotypes, online harms and serious violence,
- **staff training and induction**, and
- the school's wider **safeguarding and behaviour culture**.

The school will monitor emerging risks, including harmful online trends and content, and will adapt education, supervision and safeguarding responses where necessary.

The school will maintain an “it could happen here” approach and will seek to identify and address concerns at an early stage, recognising that child-on-child abuse may be hidden, under-reported or occur away from the school site or online.

35. Child-on-Child Sexual Violence and Sexual Harassment

All staff must be aware that **sexual violence and sexual harassment can occur between children of any age and sex**, in any environment—including schools, the family home (intra-familial abuse), and online. Abuse may involve a single perpetrator or a group of children, and in some cases a **younger child may harm an older child** due to a power imbalance (for example, differences in age, size, or cognitive ability).

Gatehouse School maintains an “*it could happen here*” approach. All reports must be taken seriously, and victims must be **listened to, reassured, supported, and protected**. They must never feel blamed, ashamed, or that they are “creating a problem” by speaking up. Staff must remember that the **law protects children from abuse—it does not criminalise them**.

Gatehouse School recognises that harmful sexual behaviour, sexual harassment and sexual violence exist on a continuum and may range from developmentally inappropriate or problematic behaviour through to abusive or criminal behaviour. The school will respond to concerns at an early stage and will take proportionate action based on the individual circumstances and safeguarding needs of the children involved.

Gatehouse School recognises that sexual harassment and sexual violence may be connected to harmful attitudes about sex, gender, relationships or power, including misogynistic or misandrist attitudes and attitudes promoted or reinforced through online content and peer groups.

The school will respond to misogynistic or misandrist behaviour where it forms part of sexual harassment, discrimination, intimidation, abuse, violence or a wider safeguarding concern.

35.1 Vulnerable Groups

While any child can experience sexual violence or harassment, certain groups may be at increased risk:

- Girls
- Children with **Special Educational Needs and Disabilities (SEND)**

- Children who are LGB, children who are questioning their gender, and children perceived to be LGB or questioning their gender
- Younger children, including those in the **EYFS**, who may express distress or disclose through play or behaviour rather than words
- Children experiencing teenage relationship abuse or coercive or controlling behaviour
- Children who are exposed to harmful online sexual or misogynistic content

The school recognises that these factors do not mean that a child will necessarily experience sexual violence or harassment and will consider each child's individual circumstances rather than making assumptions based on any characteristic.

35.2 Preventive Measures

Gatehouse School prevents and challenges sexual violence and harassment by:

- Upholding high standards of behaviour (see **Behaviour Policy**)
- Making clear that sexual violence or harassment is **never tolerated** and is **not part of growing up**
- Implementing the **Anti-Bullying Policy** and positive relationships curriculum
- Delivering age-appropriate **PSHE and RSE lessons** on consent, equality, gender stereotypes, and healthy relationships
- Teaching pupils about VAWG, misogyny, misandry, respectful relationships, harmful gender stereotypes and the influence of online content on attitudes and behaviour
- Providing accessible systems for pupils to **report concerns safely**
- Offering targeted interventions on personal safety, assertiveness, and respectful behaviour for vulnerable groups
- Ensuring robust supervision and adult presence in higher-risk areas
- Challenging all inappropriate or sexualised language and conduct immediately
- Challenging language or behaviour that normalises violence, sexual entitlement, hostility towards women or girls, hostility towards men or boys, or the degradation of others
- Identifying and responding to harmful sexual behaviour at an early stage, using proportionate, age-appropriate and evidence-based approaches

35.3 Legal Definitions

Defined under the **Sexual Offences Act 2003**:

- **Rape:** Intentionally penetrating another person's vagina, anus, or mouth with a penis without consent.
- **Assault by penetration:** Intentionally penetrating the vagina or anus with any body part or object without consent.
- **Sexual assault:** Intentionally touching another person sexually without consent.
- **Causing someone to engage in sexual activity without consent:** Forcing or coercing someone to perform or engage in sexual acts.

Consent must be given freely and can be withdrawn at any time. Children under **13** cannot legally give consent; the legal age of consent is **16**. Sexual activity without consent constitutes rape or sexual assault.

The school will ensure that pupils understand that consent, respect and personal boundaries apply to all relationships and that coercion, intimidation or pressure are not forms of consent.

Staff should recognise that the absence of physical resistance does not necessarily indicate consent and that coercion, pressure, manipulation, threats or exploitation may prevent genuine consent.

35.4 Sexual Harassment

Sexual harassment is **unwanted conduct of a sexual nature**, online or offline, that violates a person's dignity or creates an intimidating, degrading, or hostile environment.

Examples include:

- Sexual comments, jokes, or remarks about appearance or clothing
- Deliberate physical contact or interference with clothing
- Displaying or sharing sexual images, drawings, or videos
- **Online harassment**, such as:
 - Sharing of self-generated intimate images and/or videos, whether consensual or non-consensual
 - Sexualised bullying or unwanted sexual messages
 - "Upskirting" (a criminal offence)
 - Threats or coercion of a sexual nature
 - Sexist, misogynistic or misandrist abuse connected to sexual harassment or violence
 - Content encouraging or normalising violence against women and girls or violence against men and boys
 - AI-generated or manipulated sexual images, including deepfakes, used to harass, humiliate, threaten or sexually exploit a child

The school will consider whether apparently isolated incidents form part of a wider pattern of sexual harassment or harmful sexual behaviour.

35.5 Reporting and Managing Reports

All staff must:

- **Inform the DSL immediately** upon receiving a report;
- **Not investigate** but record factual details using the safeguarding system (e.g. CPOMS);
- **Reassure the pupil** that they will be supported and kept safe.
- Report concerns even where the behaviour is presented as a joke, banter, consensual interaction or online trend if there is a safeguarding concern.

- Recognise that sexual harassment may be part of a wider pattern of behaviour and should not be dismissed because an individual incident appears minor in isolation.

The DSL will:

1. Assess whether the allegation meets **local authority thresholds**.
2. Refer to **Tower Hamlets Children's Social Care (MAST)** and the **Police** where appropriate.
3. Conduct a **welfare risk assessment** for all involved (victim, alleged perpetrator, and witnesses).
4. Put in place **safeguarding support plans** tailored to each child.
5. Liaise with external agencies (e.g., **CAMHS**, **sexual health services**, or **counselling**).
6. Maintain **accurate, confidential records** of all decisions and actions.
7. Consider whether the incident is linked to VAWG, misogyny, misandry, serious violence, teenage relationship abuse, harmful sexual behaviour or online exploitation.
8. Consider whether the behaviour forms part of a wider pattern of harmful sexual behaviour, sexual harassment or sexual violence.
9. Consider the safeguarding needs of the child alleged to have caused the harm as well as the child who has experienced the abuse.
10. Consider whether early, evidence-based support or intervention may reduce the risk of further harmful behaviour.

Risk assessment factors include:

- The wishes of the child who has experienced the abuse
- Nature, severity, and context of the incident
- Age and developmental stage of those involved
- Whether it is isolated or part of a pattern
- Any power imbalance (age, size, SEND, social status)
- Ongoing risk to pupils and school context
- **Whether there are wider patterns of misogyny, misandry, violence, coercion or harmful attitudes**
- **Whether online content, social media or peer groups are contributing to the risk**

Where investigations are led by the Police or Social Care, the school will **co-operate fully**, balancing external processes with its safeguarding and disciplinary responsibilities.

35.6 Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a **continuum from healthy to abusive**. The school recognises that behaviour may be developmentally inappropriate, problematic or abusive and that early identification and proportionate intervention are important in preventing

escalation. The school recognises that some children displaying HSB may have **experienced trauma or abuse** themselves.

The DSL will:

- Manage incidents in accordance with *KCSIE 2026 Part 5*;
- Liaise with **Children's Social Care, Police**, and specialist services (e.g., **CAMHS, Lucy Faithfull Foundation Shore Space**), where appropriate
- Use evidence-based tools and specialist advice where appropriate
- Ensure all staff understand early warning signs and proportionate responses.
- Consider whether harmful sexual behaviour is connected to misogynistic or misandrist attitudes, pornography, harmful online content, peer pressure, coercive behaviour or wider patterns of violence.

35.7 Support for Victims, Perpetrators, and Others Affected

- **Children who have experienced:** Reassured, supported, protected, and provided with a trusted adult. Counselling or therapeutic support offered as needed.
- **Children alleged to have caused harm:** Supported while appropriate disciplinary or safeguarding action is taken. Risk assessments ensure fairness and safety.
- **Other affected pupils:** Monitored and supported to prevent secondary harm or bullying.

All decisions are **case-by-case**, considering:

- Impact on investigations or prosecutions;
- Whether it is reasonable to reach conclusions while these are ongoing;
- The need to balance accountability with education, welfare, and reintegration where appropriate.
- The need to address harmful attitudes, including misogyny, misandry or normalisation of violence, through appropriate education and intervention.

The school will consider the safeguarding needs of all children involved and will not assume that a child alleged to have caused harm has no safeguarding needs of their own.

Disciplinary action may occur **concurrently** with statutory investigations if it does not compromise due process.

35.8 Whole-School Culture

Gatehouse School's safeguarding culture ensures that:

- Sexual harassment and violence are **never normalised or minimised**;
- Misogyny, misandry, VAWG and violence are not normalised, trivialised or dismissed as "banter";
- Pupils understand consent, boundaries, and respect through the **curriculum and assemblies**;

- Pupils are supported to recognise harmful gender stereotypes, misogynistic and misandrist attitudes, and the ways online content can influence behaviour and relationships;
 - Staff consistently challenge inappropriate language and behaviour;
 - The environment supports **safe, respectful, and inclusive relationships**;
 - Systems for **reporting and support** are clear, accessible, and well promoted.
 - The school takes a preventative approach to VAWG and serious violence, including early identification of concerning attitudes and behaviours and appropriate intervention before behaviour escalates.
 - The school recognises that harmful sexual behaviour can escalate along a continuum and will seek to identify and respond to concerns at the earliest appropriate stage.
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36. Youth-Produced Sexual Imagery

Gatehouse School recognises that the sharing of photos and videos online and via smartphones is part of daily life for many children and young people. While this can enable connection and creativity, there are **significant safeguarding and legal risks** when the material is sexual or explicit.

Such imagery may be shared consensually or under pressure, but once distributed it can cause **serious harm to a child's mental health, safety, and reputation**.

The school also recognises the increasing use of artificial intelligence (AI), image manipulation and deepfake technology to create, alter or distribute sexualised or intimate images of children. An image does not need to be genuine to cause significant safeguarding harm. AI-generated or manipulated images may be used to humiliate, bully, threaten, blackmail, groom or sexually exploit a child.

36.1 Legal Context

Creating, possessing, or sharing indecent images of children, including certain AI-generated or manipulated images that meet the relevant legal definitions, may constitute a criminal offence under the:

- *Protection of Children Act 1978*, and
- *Sexual Offences Act 2003*.

The school recognises that AI-generated or manipulated imagery may fall within the legal framework relating to child sexual abuse material and indecent images of children. The fact that an image is AI-generated, digitally altered, or does not depict a real sexual act does not mean that it can be disregarded as a safeguarding concern.

Where an image appears to depict a child in a sexual or indecent manner, staff must treat the matter as a safeguarding concern and refer it immediately to the DSL. The school's

response will focus on safeguarding and the protection of the child, rather than on criminalising the child.

36.2 Key Principles

- **Minimise exposure:** staff should avoid viewing imagery unless absolutely necessary.
- **Protect the child:** immediate referral to the DSL ensures swift safeguarding action.
- **Do not assume that an image is genuine: AI-generated, digitally altered or deepfake imagery must be treated seriously even where it is unclear whether the image depicts a real event or person.**
- **Follow the law:** any suspected criminal content or coercion must be escalated appropriately.
- **Do not redistribute harmful imagery:** staff must never copy, download, screenshot, forward or otherwise redistribute sexual or indecent images of children.
- **Support and educate:** pupils involved are supported sensitively, with parents engaged as appropriate.

36.3 When to Report

Staff must **immediately inform the Designated Safeguarding Lead (DSL)** if they become aware that a pupil under 18:

- Has created and shared sexual imagery of themselves with another person under 18;
- Has shared sexual imagery created by another child with others; or
- Is in possession of sexual imagery created by another child.
- Has been depicted in, or appears to have been depicted in, an AI-generated, manipulated or deepfake sexual or indecent image;
- Has created, requested, shared or distributed an AI-generated or manipulated sexual or indecent image involving a child;
- Is being threatened, blackmailed, coerced or bullied in relation to sexual, intimate, indecent or AI-generated imagery; or
- Has been targeted through the creation or distribution of an image that has been digitally altered or manipulated to make it appear that they are naked, partially naked or involved in sexual activity.

36.4 Staff Responsibilities

Staff must:

- Not view or request to see the imagery unless there is a clear and compelling reason and only following consultation with the DSL.
- Not attempt to determine independently whether an image is genuine, AI-generated or manipulated.
- Not copy, download, screenshot, save, forward or share youth-produced sexual imagery, AI-generated sexual imagery, deepfakes or other indecent images of children.

- Not send the image to the DSL or other staff members by email, messaging service or other electronic means.
- If a device is involved, take proportionate steps to prevent further sharing where this can be done safely, and seek advice from the DSL before accessing or searching the device.
- Record all actions and discussions factually using the safeguarding system (e.g. CPOMS).

Where staff accidentally encounter an image, they should not continue viewing it. They should close or move away from the content where possible and report the concern immediately to the DSL, recording only the minimum information necessary to identify the concern.

EYFS and younger pupils may not understand the gravity of sharing images; staff should remain sensitive to age, developmental stage, and any additional learning needs.

36.5 Safeguarding Approach

The DSL will follow statutory and national guidance, including:

- *Keeping Children Safe in Education (KCSIE) 2026*;
- *UKCIS: Sharing Nudes and Semi-Nudes – Advice for Education Settings* (updated February 2024);
- **relevant Department for Education guidance on the safe use of generative AI in education; and**
- **relevant police, safeguarding and child protection guidance concerning online sexual abuse, image-based abuse and AI-generated content.**

The DSL will:

1. Assess the **nature, context and potential impact** of the incident.
2. **Establish, where possible, whether the imagery is genuine, manipulated or AI-generated, without requiring staff or pupils to circulate or further view the image.**
3. Determine whether the incident requires referral to the **Police or Children's Social Care.**
4. **Consider whether the child is experiencing coercion, grooming, blackmail, exploitation, bullying or other forms of abuse.**
5. Record all decisions and rationale.
6. Arrange support for those involved, including counselling or pastoral care.
7. **Consider the risk of further distribution and take appropriate safeguarding and online-safety measures to reduce that risk.**

A decision to manage the matter internally will only be taken if the DSL is confident that:

- Risks can be **safely managed within the school**; and
- **there are no indicators of abuse, exploitation, coercion, grooming, blackmail or other circumstances requiring referral to external agencies.**

Where AI-generated, manipulated or deepfake imagery appears to depict a child in a sexual or indecent manner, the DSL will seek appropriate specialist advice and consider referral to the Police and/or Children's Social Care, particularly where there are indicators of exploitation, coercion, blackmail, distribution or other criminal behaviour.

Where there is any doubt, advice will be sought from the **Tower Hamlets MAST** or the **Police**.

37. Bullying and Cyberbullying

Gatehouse School recognises that **bullying in any form** can cause significant harm to a child's wellbeing and achievement. Bullying includes **cyberbullying**, **prejudice-based**, and **discriminatory** behaviour. All incidents - online or offline - must be **taken seriously**, **reported immediately**, and **addressed in line with the school's safeguarding procedures**.

37.1 Linked Policies

Responses to bullying and cyberbullying are managed in accordance with:

- **Anti-Bullying Policy**
- **Positive Behaviour Policy**
- **Child-on-Child Abuse Policy**
- **Online Safety Policy**

This aligns with *Keeping Children Safe in Education (KCSIE) 2025* and *Behaviour in Schools: Advice for Headteachers and School Staff* (September 2022).

37.2 Staff Responsibilities

All staff are responsible for:

- Recognising the **signs of bullying or cyberbullying**, including social withdrawal, emotional distress, or avoidance behaviours.
- Acting **promptly** to report concerns to the **DSL** or **Deputy DSL**.
Supporting affected pupils and ensuring their **safety, wellbeing, and access to ongoing support**.
- Challenging all forms of prejudice-based, sexualised, or discriminatory language.

37.3 Pupil Education and Prevention

The school promotes a proactive, educational approach by:

- Teaching pupils how to recognise bullying behaviours and understand their impact.

- Embedding lessons on **digital citizenship, respectful communication, and responsible technology use** within Computing, PSHE, and RSE.
- Providing clear routes for pupils to **report bullying confidentially**.
- Encouraging **bystander intervention** and peer support strategies.
- Working in partnership with parents to reinforce safe online behaviour at home.

37.4 Response and Record-Keeping

All reported incidents are:

- Logged and monitored on the school's safeguarding system (CPOMS);
- Reviewed by the DSL to identify patterns or recurring issues;
- Addressed through restorative or disciplinary processes as appropriate;
- Followed up with support and, where necessary, referral to external agencies.

37.5 Monitoring and Review

Patterns of bullying and cyberbullying are reviewed **termly** by the DSL and **Safeguarding Link Governor** to inform staff training, policy updates, and curriculum planning.

38. Homelessness

Being homeless, or at risk of homelessness, presents a **significant risk to a child's welfare**. For primary-aged pupils, homelessness usually affects the whole family and can have serious consequences for **health, attendance, behaviour, and emotional wellbeing**.

Gatehouse School's **Designated Safeguarding Lead (DSL)** and **Deputy DSLs** are alert to early signs of housing instability and know how to refer families to the **Local Housing Authority (LHA)** or **Early Help** services at the earliest opportunity.

38.1 Possible Indicators

Staff should be alert to warning signs that a family may be at risk of homelessness, such as:

- Rent arrears or other household debt
- Domestic abuse or family conflict
- Being asked to leave a tenancy or property
- Overcrowded or unsafe living conditions
- Families moving frequently between temporary or relative accommodation

Any concerns must be reported **immediately to the DSL**.

38.2 School Response

- The **DSL** will liaise with **Tower Hamlets Housing Options Service** and, where appropriate, **Children's Social Care**.
- All actions, discussions, and referrals are **recorded securely** on the safeguarding system (e.g. CPOMS).
- The DSL will ensure that staff remain alert to the **impact of housing instability** on a child's attendance, attainment, and wellbeing.
- Where homelessness is linked to **domestic abuse**, the case will also follow procedures in the **Domestic Abuse** section of this policy.

38.3 Legal and Statutory Context

Under the **Homelessness Reduction Act 2017**, local authorities have a duty to provide advice and support to families who are homeless or at risk of homelessness.

While Gatehouse School cannot make housing assessments, it has a **safeguarding duty to identify and refer** such concerns promptly.

38.4 EYFS and Primary Considerations

Younger children may show the effects of housing insecurity through:

- Persistent tiredness or poor hygiene
- Changes in mood or behaviour
- Anxiety about home life or separation
- Reduced concentration or attendance

EYFS and classroom staff should report such patterns promptly to the DSL so early support can be sought.

38.5 Contact Information and Guidance

Tower Hamlets Housing Options Service

 homeless@towerhamlets.gov.uk

 020 7364 7474

(For advice or to refer families at risk of homelessness.)

Further Guidance

- *Keeping Children Safe in Education (2025), Part 2*
- *Working Together to Safeguard Children (2023)*
- *Homelessness Reduction Act 2017*

39. Children and the Court System

On rare occasions, children may be required to give evidence in criminal courts, either as victims or witnesses. Although this is uncommon in a primary setting, such experiences can be **stressful and confusing**, particularly for younger children.

Gatehouse School's **Designated Safeguarding Lead (DSL)** will ensure that any pupil involved in court proceedings receives appropriate **pastoral, emotional, and practical support**, and that staff handle information with **sensitivity and confidentiality**.

39.1 Criminal Courts

If a pupil is required to give evidence, the DSL will:

- Liaise with the **police and Children's Social Care** to understand the level of involvement required.
- Ensure the pupil and their parents or carers are signposted to age-appropriate resources, including HM Courts & Tribunals Service guidance for:
 - **Children aged 5–11**
 - **Children aged 12–17**
- Coordinate in-school support (e.g. a trusted adult or School Nurse) to help manage anxiety or distress.
- Record all actions and ensure **safeguarding records** reflect involvement with external agencies.

39.2 Family Courts

Family court proceedings can be **emotionally challenging** for children, particularly during **parental separation** or disputes over living arrangements.

Where appropriate, parents will be signposted to the **Ministry of Justice's "Making Child Arrangements" toolkit**, which outlines:

- Each party's legal responsibilities.
- Guidance on **reducing conflict** and **prioritising the child's wellbeing**.
- Sources of **support and mediation** services.

39.3 School Role

- The DSL and **Pastoral Lead** will ensure that any change in family circumstances or court involvement is reflected in the child's **pastoral records**.
- Staff are reminded that even where a child appears unaffected, the emotional impact may surface later through **changes in mood, concentration, or behaviour**.
- All staff should report any emerging concerns to the **DSL** immediately.

39.4 Further Guidance

- *Keeping Children Safe in Education (2025), Part 2*
 - *HM Courts & Tribunals Service: Going to Court – Support for Children and Young People*
 - *Ministry of Justice: Making Child Arrangements – A Toolkit for Families*
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40. Children with Family Members in Prison

The school recognises that children with a parent or close family member in prison may be vulnerable to emotional distress, stigma, or disruption to family life. Staff remain alert to changes in behaviour or wellbeing that may indicate a need for additional support. Where appropriate, the Designated Safeguarding Lead will liaise with external agencies and consider Early Help or pastoral intervention to promote stability and emotional resilience.

Children with a family member in prison may experience:

- **Poverty** or financial instability
- **Stigma, shame, or social isolation**
- **Anxiety, sadness, or confusion** about the parent's absence
- **Disrupted family relationships** or living arrangements

40.1 School Responsibilities

Gatehouse School recognises that imprisonment of a family member is a **safeguarding issue** which can create vulnerability.

The **Designated Safeguarding Lead (DSL)** will:

- Provide **pastoral and emotional support** for affected pupils through trusted adults in school (e.g. Pastoral Lead or School Nurse).
- Maintain appropriate **confidentiality**, sharing information on a **need-to-know basis** only.
- Liaise with the **non-imprisoned parent or carer, Social Care, or Early Help** services as appropriate.
- Use resources from the **National Information Centre on Children of Offenders (NICCO)** to guide support strategies and signpost families to external services.

40.2 Staff Awareness

All staff should:

- Be alert to **changes in behaviour**, attendance, or emotional wellbeing.

- Approach the issue with **sensitivity and without judgment**, recognising that affected children may find it difficult to talk about their experiences.
- Report any emerging concerns to the **DSL** immediately.

40.3 EYFS and Younger Pupils

For younger children, the absence of a parent may present through **separation anxiety**, **clinginess**, or **regression in behaviour**. EYFS staff should be particularly observant and report any signs of distress or confusion to the DSL promptly.

40.4 Further Guidance

National Information Centre on Children of Offenders (NICCO) – <https://www.nicco.org.uk>

41. Private Fostering

A **private fostering arrangement** occurs when a **child under 16 years old** (or **under 18 if disabled**) is cared for **by someone who is not their parent, legal guardian, or a close relative** (defined as a grandparent, sibling, uncle, aunt, or step-parent by marriage or civil partnership) for **28 days or more**, or when there is an **intention** for the arrangement to last this long.

Private fostering can arise for various reasons, such as:

- Parental illness, bereavement, or family breakdown
- Parents working or studying away from home (including overseas)
- Children sent to the UK for education
- Children living with friends after family conflict or separation

41.1 School Responsibilities

All staff have a duty to **remain vigilant** and **report any concerns** that a pupil may be privately fostered to the **Designated Safeguarding Lead (DSL)**.

The **DSL** will:

- Gather relevant information sensitively and discreetly.
- **Notify Tower Hamlets Children's Social Care** via a **MASH referral** in accordance with *THSCP Multi-Agency Private Fostering Guidance (January 2022)*.
- Record all actions and correspondence securely within the school's safeguarding system.
- Continue to monitor the child's welfare and liaise with the Local Authority during their assessment process.

The Local Authority is legally required to **assess the suitability and safety** of the private fostering arrangement and to provide **ongoing support and monitoring**.

41.2 Staff Awareness

Indicators that a pupil may be privately fostered include:

- Mentioning living with someone other than a parent or close relative
- Unexplained change of address or primary carer
- Difficulty contacting parents abroad
- Extended absence or holidays in another household
- A host family collecting or caring for a child regularly

All such concerns must be referred **immediately** to the **DSL**.

41.3 EYFS and Younger Pupils

For younger children, staff should pay attention to **who regularly collects or drops off the child** and whether the adult is to be a parent, carer, or relative. Early identification is crucial to ensure that children in informal care arrangements are **safely supported and monitored**.

41.4 Further Guidance

[THSCP Multi-Agency Private Fostering Guidance \(2022\)](#)

42. Young Carers

Gatehouse School recognises a young carer as a person under 18 who provides unpaid care to a family member or friend who could not cope without their support. Young carers may be more vulnerable to difficulties affecting their attendance, educational progress, physical and emotional wellbeing, and participation in school life. The school will remain alert to the possibility that a pupil may have caring responsibilities and will provide appropriate safeguarding, pastoral and early-help support where required.

- **Personal care**, such as dressing, bathing or assisting with mobility
- **Practical care**, such as cooking, cleaning or managing household tasks
- **Emotional support**, such as providing reassurance or helping manage anxiety and stress

42.1 Context and Vulnerability

Young caring responsibilities can have a significant impact on a child's:

- Attendance and punctuality
- Academic progress and concentration

- Physical and emotional wellbeing
- Ability to participate in school life and enrichment activities

Younger pupils may not recognise themselves as carers or may feel reluctant to share their circumstances due to stigma or fear of family separation.

42.2 School Responsibilities

Gatehouse School recognises that **young carers are a vulnerable group** who may require early help and additional pastoral support.

The **Designated Safeguarding Lead (DSL)** will:

- **Identify and support** pupils who may be undertaking caring roles.
- **Liaise with parents or carers** sensitively to understand the caring context.
- **Refer to the Tower Hamlets Young Carers Programme** for assessment and practical support: [✉ Young.Carers@towerhamlets.gov.uk](mailto:Young.Carers@towerhamlets.gov.uk)
- Follow the guidance [*Young Carers in School: A Guide for Education Practitioners \(January 2023\)*](#).
- Record concerns and support measures on the school's safeguarding system.

The school recognises that young carers may be entitled to a statutory young carer's needs assessment where the relevant criteria are met, and will support families in accessing appropriate assessment and support.

42.3 Staff Awareness

All staff should remain alert to potential indicators that a pupil may be a young carer, including:

- Regular lateness or absence
- Tiredness or lack of concentration
- Ill-preparedness for school or incomplete homework
- Isolation from peers or limited participation in clubs or trips
- Mentioning caring tasks or household responsibilities beyond their age

Any concerns that a pupil may be a young carer, or that caring responsibilities may be affecting their wellbeing, education or safety, should be reported to the DSL in accordance with the school's safeguarding procedures.

42.4 EYFS and Younger Pupils

In Early Years settings, indicators may include children who show anxiety about leaving home, talk about looking after a parent or sibling, or display heightened emotional maturity. Staff should remain alert to signs that a child may have caring responsibilities and should handle any disclosures sensitively, informing the DSL where appropriate.

42.5 Tower Hamlets Support

Tower Hamlets Young Carers Engagement Officer

 Samantha.anderson@towerhamlets.gov.uk

 07985 607 928

43. Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Abduction may be committed by:

- Parents or other family members
- People known to the child but not related (e.g. neighbours, friends, acquaintances)
- Strangers

All suspected or actual incidents of child abduction must be reported **immediately** to the **Police** and **Children's Social Care**, and recorded on **CPOMS**.

Other community safety incidents near the school — such as adults loitering, following, or attempting to engage pupils in conversation — must also be reported immediately to the **Designated Safeguarding Lead (DSL)**. The DSL will take appropriate action to ensure the safety and wellbeing of all pupils and, where necessary, liaise with the police and local authority safeguarding partners.

As children grow and gain independence (e.g. walking to and from school independently in Year 6), the school provides age-appropriate **personal safety education** through:

- **PSHE lessons** on personal safety, boundaries, and stranger awareness
- **Trips and workshops** led by local services and child-safety organisations
- **Visits from external agencies**, such as Transport for London (TFL) or community safety teams, to promote journey safety and confident decision-making

This proactive approach ensures that pupils understand how to stay safe in the community and know what to do if they ever feel unsafe or approached by someone they do not know.

44. Modern Slavery

Modern slavery is a serious crime that encompasses a range of forms of exploitation in which a person is controlled, coerced or deceived for another person's gain. It includes:

- **Human trafficking**
- **Slavery and servitude**
- **Forced or compulsory labour**

Exploitation may take many forms, including sexual exploitation, forced labour, domestic servitude, forced criminality, or organ harvesting.

Children cannot consent to being exploited or trafficked, even if they appear to have agreed or are receiving something in return.

Staff will remain alert to indicators that a child may be a victim of modern slavery, including:

- Unexplained absences or frequent moves between schools or locations
- Signs of physical or emotional abuse
- Poor living conditions or lack of personal possessions
- Reluctance to discuss their circumstances or relationships
- Accompanying adults who are controlling, distant, or speak for the child

The **Designated Safeguarding Lead (DSL)** will refer any potential child victims of modern slavery or trafficking to the **Local Authority via the Multi-Agency Safeguarding Team (MAST)**, following statutory guidance.

The school follows the **Modern Slavery Statutory Guidance (Home Office, 2021)** and the **Modern Slavery Act 2015**, ensuring staff are aware of reporting responsibilities and procedures for supporting victims.

45. Taking Safeguarding Action

Any child, in any family, in any school could become a victim of abuse. Staff should always maintain an attitude of “**it could happen here.**”

Key actions for staff:

1. In an emergency, take immediate action to protect the child, including calling 999.
2. Report concerns as soon as possible to the DSL, and no later than the end of the day. Do not start your own investigation.
3. Share information only on a need-to-know basis; do not discuss concerns with colleagues, friends, or family.
4. Complete a record of concern promptly.
5. Seek support for yourself if you are distressed by the incident.

46. Early Help

Gatehouse School recognises that children and families may benefit from help and support as soon as problems emerge. In accordance with **Keeping Children Safe in Education 2026** and **Working Together to Safeguard Children 2026**, this may include universal services and community-based early help, as well as the targeted early help level of Family Help.

Family Help brings together targeted early help and support for children in need under section 17 of the Children Act 1989, providing a more coordinated and seamless approach to supporting children and their families.

Gatehouse School follows the “**Think Family**” approach, recognising that improving outcomes for children often requires consideration of the needs and circumstances of the wider family.

Staff should identify emerging needs at the earliest opportunity and discuss concerns with the Designated Safeguarding Lead (DSL), who will consider the appropriate level of support in accordance with local threshold arrangements and the current Family Help framework.

46.1 Role of Schools

The **Tower Hamlets Early Help Strategy and updated Family Help framework** highlights the key role schools play in identifying children and families at risk of poor outcomes without early intervention.

All staff should understand that *any child* may benefit from Early Help, but some children are more likely to need additional support, particularly those with known vulnerabilities (see list below).

When a member of staff identifies that a pupil or family may benefit from Early Help, they should record the concern on **CPOMS** and discuss it with the **Designated Safeguarding Lead (DSL)**.

The DSL will consider whether support should be provided through the school’s existing pastoral arrangements, Early Help/Family Help services, or through a multi-agency response, in accordance with the current local Family Help framework and threshold arrangements.

46.2 Assessment, Family Help and Multi-Agency Support

When an **Early Help Assessment (EHA)** has been completed and a **Team Around the Family (TAF)** is in place, the school can refer the case to the **Social Inclusion Panel** for a coordinated, multi-agency response to improve the child’s outcomes.

The **DSL** will apply the **LBTH Thresholds Guidance** and **THSCP Levels of Need Guidance** to determine the appropriate safeguarding response. If the level of need is uncertain, the DSL will seek advice from the **LBTH Multi-Agency Support Team (MAST) Safeguarding Hub (MASH)**.

Key Contacts

- **LBTH Early Help Hub:** 020 7364 5006 (Option 2)

- **MAST Safeguarding Hub (MASH):** 020 7364 5006 (Option 3)
Alternative lines: 020 7364 5601 / 5606 / 5358 / 7796
- **Child Protection Advice Line:** 020 7364 3444
- **Early Help Enquiry Form:** bit.ly/2AA2WNY

46.3 Escalation to Children's Social Care

If a child receiving **Early Help or Family Help** does not show improved outcomes or if concerns escalate, the **DSL** will refer the case to **Children's Social Care** without delay.

The DSL will always act in accordance with the **THSCP Escalation Policy** and the **current Family Help and safeguarding arrangements** to ensure timely, proportionate intervention.

46.4 Children Who May Benefit from Early Help or Family Help

Children who may require additional Early Help or Family help support include, but are not limited to:

- Disabled children or those with **Special Educational Needs** (with or without an EHCP)
- Children who have **English as an Additional Language (EAL)**
- Children living away from home for the first time
- Children facing **challenging family circumstances** or conflict
- **Looked-after children** and **previously looked-after children**
- Children showing early signs of **antisocial or criminal behaviour**
- **Young carers**
- Children at risk of **radicalisation or extremism**
- Children displaying early signs of **abuse, neglect, or poor mental health**
- Children who experience **discrimination or maltreatment** based on race, religion, ethnicity, sexual orientation, or gender identity

46.6 Challenges in Recognising Abuse in Vulnerable Children

Staff must remain alert to the particular challenges in identifying abuse and neglect among vulnerable children.

- Behaviours, moods, or injuries may be wrongly attributed to a child's disability.
- Children with SEND may be **disproportionately affected by bullying** without showing obvious signs.
- **Communication barriers** may make disclosure difficult.
- Disabled children may have a limited understanding of what constitutes abuse.

Staff are expected to be **vigilant, proactive, and curious** in recognising potential indicators of need and ensuring the right Early Help or Family Help interventions are provided at the right time.

47. Handling the Reporting or Sharing of Concerns

47.1 If a Pupil Discloses Abuse or Neglect

If a pupil makes a disclosure or expresses concern, staff must respond calmly and sensitively.

Staff should:

- Stop all other activities and **listen attentively**.
- Allow the child to **speak freely**; do not interrupt or rush.
- Use only **open questions** (what, when, how, where); **avoid leading questions** or expressing disbelief.
- **Do not investigate** or make assumptions about what occurred.
- **Reassure the child** that they have done the right thing by speaking up, but **do not promise confidentiality**.
- Explain that the information must be shared with the **Designated Safeguarding Lead (DSL)** to help keep them safe.
- **Report the disclosure immediately** to the DSL (or a Deputy DSL in their absence).
- **Record the conversation** factually, in the child's own words, using the school's reporting system.
- Share information **only on a need-to-know basis**.

EYFS staff should be particularly alert to **disclosures made through play, drawings, or changes in behaviour**, and must follow the same reporting procedure.

47.2 Recording Concerns

A written record must be made **as soon as possible CPOMS**.

The record should include:

- Date, time, and location of the disclosure or observation
- **Exact words** used by the child and any others present
- Description of **non-verbal behaviours** or emotional state
- Details of **any physical signs** of abuse (without examining the child)
- **Actions taken**, including who was informed and when

Any physical or digital evidence (e.g. notes, devices, clothing) must be **secured and passed to the DSL**. Staff must not retain copies.

47.3 Online Incidents

Staff must never intentionally view or share illegal images of a child.

If exposure is unavoidable (e.g. to prevent further harm):

- Stop viewing immediately and **report to the DSL**.
- The DSL will follow [Searching, Screening and Confiscation](#) (DfE, 2022) and [UK Council for Internet Safety](#) guidance.
- Never forward or copy imagery.

47.4 Procedure for Staff Concerns

All welfare, safeguarding, or mental-health concerns must be **reported immediately to the DSL**.

If the concern involves a staff member, follow procedures in the *Managing Allegations Against Staff* section.

Do not assume another colleague will act. Record all **concerns, decisions, and actions** in writing on CPOMS.

47.5 Making Referrals

- Children who are not at immediate risk of significant harm but who have additional or unmet needs may benefit from community-based early help or Family Help. The DSL will consider the appropriate level of support in accordance with local threshold arrangements and, where appropriate, will work with the child and family and relevant agencies to initiate or refer for appropriate support.
- **Children in immediate danger or at risk of harm – a referral to Children’s Social Care and/or the Police** must be made **immediately**.
 - Anyone can make a referral.
 - The DSL must be informed at the earliest opportunity.
- **Female Genital Mutilation (FGM)**: Teachers who discover that FGM appears to have been carried out on a girl under 18 have a **statutory duty to report directly to the Police**, and must also inform the DSL.
- **Radicalisation concerns**: Follow normal safeguarding procedures and refer to the DSL for potential **Channel** referral.

47.6 Parental Concerns

Parents and carers may report welfare concerns to any member of staff. All reports must be passed immediately to the DSL. In emergencies, or if staff believe appropriate action is not being taken, **anyone can make a direct referral to Children’s Social Care**.

47.7 Duties of the Designated Safeguarding Lead (DSL)

When notified of a concern, the DSL will:

- **Decide next steps** in line with *Tower Hamlets Safeguarding Children Partnership (THSCP)* thresholds.
- Consider:

- The **best interests and wishes** of the child
 - The **nature and seriousness** of the concern
 - **Contextual factors** and known vulnerabilities
 - Relevant **inter-agency procedures**
- **Refer to Children's Social Care** or the **Police** for any suspected criminal offence or serious safeguarding concern.
 - If no referral is made, the DSL will **record the rationale** and **monitor the situation**, initiating further action if the child's circumstances do not improve.

47.7 Record Keeping

All safeguarding and child-protection records are:

- **Confidential**, stored securely on **CPOMS**, and accessible only to the DSL and Deputy DSLs.
- Include a **comprehensive summary** of the concern, decisions made, actions taken, and the outcome.
- Retained and transferred in accordance with *KCSIE 2026*, *Data Protection Act 2018*, and *UK GDPR*.

48. Confidentiality and Sharing Information

Effective safeguarding relies on **timely and appropriate information sharing** between staff and with other agencies. All staff must understand that sharing relevant information is a **professional and legal duty**, not a breach of confidentiality (See Appendix 6)

48.1 Core Principles

- Staff must **not assume** that another colleague or professional will take safeguarding action or share critical information.
- **Early sharing** of information is vital for effective identification, assessment, and allocation of services to protect children from harm.
- **Fears about sharing information** must never prevent the promotion of a child's welfare or protection.
- When in doubt about whether and what to share, staff must **seek advice from the Designated Safeguarding Lead (DSL)** or a Deputy DSL without delay.
- **Serious Case Reviews and Child Safeguarding Practice Reviews** consistently show that **failures to share information** at the right time can have serious, and sometimes fatal, consequences.

48.2 Legal and Statutory Framework

Information sharing must always comply with:

- *UK General Data Protection Regulation (UK GDPR)*
- *Data Protection Act 2018*
- *Human Rights Act 1998*
- *Keeping Children Safe in Education (2025)*
- *Information Sharing: Advice for Practitioners (May 2024)*

These laws and guidelines **do not prevent** the sharing of information for safeguarding purposes; they provide a **framework to ensure it is done appropriately**.

48.3 Seven Golden Rules for Information Sharing

(as set out in [HM Government 2024 guidance](#)):

1. **Data protection legislation is not a barrier** to sharing information when the purpose is to safeguard a child.
2. **Be open and honest** with individuals and families about what information may be shared, unless doing so would place a child at risk.
3. **Seek advice** if you are unsure.
4. **Share with consent** where appropriate and possible, but **you may share without consent** if there is a safeguarding concern or risk of significant harm.
5. **Put the child's safety and wellbeing first** in all decisions.
6. **Ensure information shared is necessary, proportionate, relevant, accurate, timely, and secure.**
7. **Keep a record** of what information was shared, with whom, and why.

48.4 Storage and Security

- Child-protection information is stored **securely**, separate from the pupil's main school file.
- Electronic and online safeguarding records are protected by **cybersecurity measures** in line with the *Department for Education's Cybersecurity Standards (2024)*.
- Child-protection data is stored, accessed, and destroyed in accordance with the **School's Retention and Destruction Policy**, *UK GDPR*, and *Data Protection Act 2018*.
- Only the **DSL and Deputy DSLs** have access to full child-protection files on **CPOMS** or the designated secure platform.

48.5 Sharing Information Without Consent

The **DSL may share information without consent** if:

- The **Police or Children's Social Care** instruct it; or
- There is **good reason to believe** that sharing will help safeguard a child.

All decisions to share, or not share, information are **recorded in writing**, including the rationale and outcome.

48.6 Informing Parents

- Parents are **usually informed** when safeguarding action is being taken.
- However, the **DSL may consult** with the **Local Authority Designated Officer (LADO)**, **Children's Social Care**, **Police**, or the **Headteacher** before doing so if informing parents could place a child at risk of harm.
- For **Channel referrals**, the DSL considers consent of the pupil or parent depending on individual circumstances, such as **health, law-enforcement, or public-protection** concerns.
- When referring a matter to Social Care or the Police, parents/guardians and (where appropriate) the pupil are **informed in writing** of their right to make their own referral and are provided with relevant contact details.
- **Parental consent is not required** for referrals where there is a risk of significant harm. Staff must always act in the **best interests of the child**, even when this conflicts with parental wishes.

49. Referring to Children's Social Care

49.1 When the DSL must refer

The Designated Safeguarding Lead (DSL) will make an immediate referral to Children's Social Care where it is believed a pupil is:

- **Suffering, or at risk of suffering, significant harm** (*Children Act 1989, s.47*), or
- A **Child in Need**—i.e., unlikely to achieve or maintain a reasonable standard of health or development, or whose health/development is likely to be significantly impaired without services (*Children Act 1989, s.17*).

If a child is in **immediate danger**, call **999** first, then inform the DSL.

49.2 Thresholds and advice

- The DSL applies the **Tower Hamlets Safeguarding Children Partnership (THSCP) Levels of Need Guidance** to determine threshold.
- For advice and referrals the DSL contacts:
 - **LBTH Multi-Agency Support Team (MAST)**: 020 7364 5006 (Option 3) / 020 7364 5601 / 5606 / 5358 / 7796
 - **Child Protection Advice Line (CPAL)**: 020 7364 3444

49.3 Making the referral

- The DSL will **consult CPAL/MAST** initially where appropriate.
- The DSL completes and submits a **MAST Request for Support** form with **sufficient detail** to allow MAST to determine the statutory response.

- If the child is **already open to CSC**, the DSL contacts the **allocated Social Worker** directly and records the contact.

49.4 After the referral

- The DSL records **all actions, decisions, times, and outcomes** on the school's safeguarding system.
- The DSL **seeks written confirmation/acknowledgement** of the referral and expected next steps.
- If no decision/response is received **within one working day**, the DSL **chases CSC** and considers **escalation** (below).

Parental consent is **not required** where seeking it would place the child at further risk or prejudice a police/CSC response. (See Information-Sharing section for more detail.)

49.5 Escalation Procedures (THSCP Multi-Agency Escalation & Resolution Policy)

If the response from Children's Social Care (or any agency) **does not lead to improvement** or there is **professional disagreement** about threshold, risk, or action, the DSL will escalate as follows:

1. **Team Manager** – raise concerns **in writing** and request a review of the decision.
2. **Service Manager** – if unresolved, escalate **in writing** with chronology and rationale.
3. **Divisional Director** – if still unresolved, escalate **in writing**, attaching prior correspondence and the school's assessment of risk.

At every stage:

- Aim to resolve differences through **professional discussion** and child-centred problem-solving.
- **Document** concerns, contacts, decisions, and rationales **in writing** on the safeguarding record.
- **Inform the family** where appropriate and safe to do so, in line with information-sharing guidance.

The DSL retains oversight until the concern is resolved and the child's situation has **demonstrably improved**.

50. Safer Recruitment Process

Gatehouse School is committed to robust safer recruitment practices to ensure the safety and welfare of children. In line with the Department for Education's statutory guidance, Keeping Children Safe in Education (KCSIE) 2026, the following procedures are implemented:

- **Enhanced DBS Checks:** All staff, including part-time, temporary, and supply staff and visiting personnel such as musicians and sports coaches, undergo **the appropriate level of Disclosure and Barring Service (DBS) check for their role. Staff whose roles constitute regulated activity with children must have an enhanced DBS check with children's barred list information**, as required by safeguarding legislation and applicable statutory guidance.
- **Safer Recruitment Training:** At least one member of every recruitment panel has received accredited safer recruitment training, ensuring informed decision-making during the hiring process.
- **Online Searches:** As part of due diligence, the school conducts online searches of shortlisted candidates. This practice, recommended by KCSIE 2026, helps identify any publicly available information that may raise safeguarding concerns. The process is carried out consistently and fairly, with candidates informed in advance about the possibility of such searches NASUWT.
- **Single Central Record (SCR):** The school maintains an up-to-date SCR that documents all pre-employment checks for staff, including DBS checks, identity verification, and eligibility to work in the UK. This record is regularly reviewed and is available for inspection by regulatory bodies. The SCR also records the relevant checks undertaken for governors, trustees and other individuals where required by KCSIE 2026.
- **Governors and Trustees:** Under KCSIE 2026, **the school ensures that the appropriate DBS checks are completed for governors and trustees, in line with the requirements for independent schools. Where required, these checks are recorded on the Single Central Record (SCR).**
- **Agency and Supply Staff:** When engaging agency or supply staff, the school obtains written confirmation that all required checks have been completed. The school retains the right to view the original DBS certificates and verify identity upon arrival.
- **Volunteers and Regulated Activity:** From 1 September 2026, the previous supervision exemption for regulated activity with children is removed. Accordingly, a volunteer who teaches, trains, instructs, cares for or supervises children may be undertaking regulated activity even where they are supervised by a member of staff, where the relevant frequency or period conditions are met. This includes activity undertaken frequently or on more than three days in 30 days, or activity undertaken overnight. Volunteers undertaking regulated activity must have an enhanced DBS check, including children's barred list information, before undertaking such activity.

- **Volunteers Not in Regulated Activity:** Volunteers whose activities do not constitute regulated activity will be subject to a written risk assessment to determine what checks, if any, are appropriate. Depending on the nature of the role and level of access to children, the school may require an enhanced DBS check without barred list information or a basic DBS check. A volunteer who has not undergone appropriate checks must not be left unsupervised with children or permitted to undertake regulated activity.
- **Occasional Volunteers:** The school will distinguish between volunteers undertaking regulated activity and those providing occasional assistance. Parents, carers and other volunteers undertaking occasional activities that do not meet the regulated activity criteria will not ordinarily require an enhanced DBS check with children's barred list information, although the school may require an appropriate DBS check following a risk assessment.
- **Supervision Arrangements:** The school will no longer rely on supervision alone to determine that a volunteer is outside regulated activity where the relevant regulated activity and frequency or period conditions are met. Volunteer roles will therefore be reviewed to determine whether they fall within regulated activity under the KCSIE 2026 and the amended legal definition.
- **Safer Recruitment Policy:** The school's Staff Recruitment Policy outlines the procedures and responsibilities related to recruitment and selection, ensuring compliance with safeguarding requirements, and will be reviewed to reflect changes to regulated activity, volunteer checks and DBS requirements introduced for KCSIE 2026.

By adhering to these practices, Gatehouse School demonstrates its commitment to safeguarding children and ensuring that all individuals employed or volunteering within the school are suitable to work with children. The school will keep volunteer roles under review and ensure that any individual undertaking regulated activity with children has the appropriate enhanced DBS check, including children's barred list information, before undertaking that activity.

51. School Premises, Security, and Visitors

Gatehouse School will take all practicable steps to ensure that the school premises are safe and secure. Measures in place include:

- **Access Control:** CCTV coverage in key areas including the playground, a controlled entry system at the main entrance, and access restrictions throughout the school. Staff monitor entrances at the start and end of the school day.
- **Parent Access:** Parents are not permitted beyond the playground during drop-off and pick-up unless they have a scheduled appointment or query. In such cases, they are met and escorted by a member of staff at the reception area.
- **Staff Identification:** All staff wear photo ID badges at all times when on school premises or engaged in school activities.

- **Visitor Management:** All visitors must sign in upon arrival via the Inventory system and sign out when leaving. Visitors are escorted by a member of staff at all times and must display a visitor badge clearly.
- **Security Awareness:** All staff and visitors are briefed on safeguarding and site security expectations to ensure the welfare of pupils at all times.

These measures are designed to reduce risks to pupils, staff, and visitors and to maintain a safe and secure learning environment.

52. Monitoring this Policy

- **Incident Review:** Any child protection incident will trigger a review of the school's safeguarding procedures, with findings reported to the governors. If the incident involves a member of staff, the Local Authority Designated Officer (LADO) will support the review to identify improvements.
 - **DSL Monitoring:** The Designated Safeguarding Lead (DSL) monitors the day-to-day operation of this policy and reports regularly to the Senior Leadership Team. A formal report is presented to the governors each term as part of the Headteacher's Report.
 - **Governor Oversight:** Governors undertake an annual review of the policy and its implementation, including cooperation with local safeguarding agencies and compliance with statutory duties. They consult with staff, including the DSL, when considering updates to safeguarding arrangements.
 - **Continuous Improvement:** Any deficiencies or weaknesses identified in safeguarding procedures are addressed without delay.
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53. Linked Policies

This Safeguarding Policy should be read in conjunction with the following school policies:

- Anti-Bullying Policy
- Health and Safety Policy
- Educational Visits Policy
- Safer Recruitment Policy
- Code of Conduct for Staff
- Behaviour Policy
- Child-on-Child Abuse Policy
- Online 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: Safeguarding Poster



SAFEGUARDING IS EVERYONE'S RESPONSIBILITY

SAFEGUARDING TEAM



MS PAULINE MOISY

Head of Pastoral, DSL

☎ 120 - Pastoral Room



MRS SEVDA KORBAY

Headteacher, DDSL

☎ 200 - Head's Office



MRS CONTI MOLL

Deputy Headteacher, DDSL

☎ 209 - Deputy's Office



MRS FIONA TIGHE

Safer Recruitment, DDSL

☎ 442 - 6T Classroom



MS AILEEN REIDY

Head of EYFS, DDSL

☎ 210/211 - Nursery



MRS JENNI VEITCH

SENDCo, DDSL

☎ 371 - SEND Office



IVETTA CINGELOVA

Nurse, DDSL

☎ 001 - Medical Room

**WORRIED?
SCARED?
SAD?**



SPEAK TO US.

Appendix 2: Safeguarding Contact Details

School

Position	Name	Phone	Email
Designated Safeguarding Lead (DSL)	Pauline Moisy	07963188623	pauline.moisy@gatehouseschool.co.uk
DSL (Safer Recruitment)	Fiona Tighe	07957565416	fiona.tighe@gatehouseschool.co.uk
Deputy DSL - EYFS	Aileen Reidy	07941226306	aileen.reidy@gatehouseschool.co.uk
Deputy DSL - SEND	Jenni Veitch	07543661015	jenni.veitch@gatehouseschool.co.uk
Head	Sevda Korbay	07949384148	head@gatehouseschool.co.uk
Chair of Governors	Rej Bhumbra	07905 010 089	chair@gatehouseschool.co.uk
Safeguarding Governor	Emmanuelle Whale		

Local Authority Children's Social Services

Name	Phone	Out of hours phone	Email
Multi-Agency Support Team (MAST).	0207 364 3444 / 5601 / 5606 / 5358 / 7796	Children's Social Care Emergency Out of Hours Duty Team (5.00pm onwards) 020 7364 4079	MAST@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 Consultation and Advice

Title	Name	Phone	Email
Education Safeguarding Quality Assurance & Training Officer	Dr Chris Jordan	02073643437 / 07562431829	chrisjordan@towerhamlets.gov.uk

Education Safeguarding Officer Tower Hamlets.	Mohammed Ali	02073643524	Mohammed.Ali@towerhamlets.gov.uk
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Allegations Against Staff

Title	Name	Phone	Email
Local Authority's Designated Officer (LADO)	Melanie Benzie	02073640677	LADO@towerhamlets.gov.uk

Extremism

Title	Name	Phone	Email
Local Authority Prevent Lead for Tower Hamlets	Jake Butterworth	020 7364 3009 / 020 7364 4549	Mash@towerehamlets.gov.uk
Prevent Education Officer	Iona Karrman-Bailey	020 7364 4549	Iona.Karrman-Bailey@towerhamlets.gov.uk
DfE non-emergency advice			counter-extremism@education.gsi.gov.uk https://report-extremism.education.gov.uk/
Police	Non-emergency number	101	N/A

Female Genital Mutilation (FGM)

Title	Phone	Email
LSCP Lead for FGM	020 76411610/ 0207 3777 225	IPST@towerhamlets.gcsx.gov.uk
Project Azure	02071612888	N/A
Metropolitan Police	999 / 112	N/A

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 3: Definitions and Key Terms

Term	Definition
Safeguarding	The process of protecting children from maltreatment, preventing impairment of health or development, ensuring they grow up with safe and effective care, and taking action to enable all children to have the best outcomes. (<i>Working Together to Safeguard Children 2023</i>)
Child Protection	The specific actions taken to protect a child suffering, or likely to suffer, significant harm. It is a component of safeguarding.
Child	Anyone under the age of 18, including pupils in EYFS settings.
Designated Safeguarding Lead (DSL)	The senior member of staff with lead responsibility for safeguarding and child protection within the school. Supported by trained Deputy DSLs.
Significant Harm	The threshold for intervention under s.47 of the Children Act 1989. Harm means ill-treatment or impairment of health or development, taking account of the child's health and development compared with what could be reasonably expected of a similar child.
Early Help	Support offered at the earliest opportunity to address emerging needs and prevent issues from escalating into harm or abuse.
Child in Need (s.17)	A child unlikely to achieve or maintain a reasonable standard of health or development, or whose health/development is likely to be significantly impaired without the provision of services.
Abuse	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. Abuse can be physical, emotional, sexual, or neglect.
Physical Abuse	Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or causing physical harm.

Emotional Abuse	Persistent emotional maltreatment causing severe and adverse effects on emotional development, including conveying worthlessness or seeing/hearing the ill-treatment of others.
Sexual Abuse	Forcing or enticing a child to take part in sexual activities (contact or non-contact), including grooming, online abuse, or sexual exploitation.
Neglect	Persistent failure to meet a child's basic physical and/or psychological needs likely to result in serious impairment of health or development.
Contextual Safeguarding	Recognising and responding to risks of harm outside the home environment (e.g., in school, online, or in the community).
Child-on-Child Abuse	Harm caused by one child to another, including bullying, physical abuse, sexual harassment, sexual violence, or online abuse. Also called peer-on-peer abuse.
Child Sexual Exploitation (CSE)	A form of child sexual abuse where an individual or group exploits an imbalance of power to coerce, manipulate, or deceive a child into sexual activity in exchange for something they need or want, or for the perpetrator's advantage.
Child Criminal Exploitation (CCE)	When an individual or group exploits a child to commit criminal acts, such as drug running (County Lines), theft, or violence, through coercion, deception, or abuse of power.
County Lines	The exploitation of children and vulnerable people to transport, store, and sell drugs or other contraband across regions using dedicated phone lines.
Serious Youth Violence	Any violent crime committed by or against someone under 18, including knife crime, assault, and gang-related violence.
Domestic Abuse	Any incident or pattern of incidents of controlling, coercive, threatening, degrading, or violent behaviour between those aged 16 or over who are personally connected. Children witnessing domestic abuse are victims in their own right under the Domestic Abuse Act 2021.
Honour-Based Abuse (HBA)	Crimes committed to protect or defend the honour of a family or community, including FGM and forced marriage.
Female Genital Mutilation (FGM)	The partial or total removal of the external female genitalia for non-medical reasons. It is illegal in the UK and must be reported to the police if discovered on a girl under 18.

Forced Marriage	Marriage entered into without the free and full consent of one or both parties. It is a criminal offence in England and Wales.
Virginity Testing / Hymenoplasty	Illegal medical or pseudo-medical practices involving examination or restoration of the hymen; constitute abuse.
Radicalisation	The process by which an individual is drawn into extremist ideologies or terrorism.
Extremism	Vocal or active opposition to fundamental British values (democracy, rule of law, individual liberty, and mutual respect/tolerance of different faiths and beliefs).
Prevent Duty	The statutory duty under the Counter-Terrorism and Security Act 2015 to have due regard to preventing people from being drawn into terrorism.
Channel Programme	A voluntary, multi-agency programme providing support to individuals vulnerable to radicalisation.
Youth-Produced Sexual Imagery (Sexting)	The creation or sharing of sexual photos or videos by children under 18. Illegal under the Protection of Children Act 1978.
Cyberbullying	Bullying that takes place over digital devices such as phones, tablets, or computers.
Online Safety	Protecting children from harm online, including content, contact, conduct, and commerce risks. Schools must meet DfE Filtering and Monitoring Standards (2024).
Cybersecurity	The protection of networks, systems, and data from digital attacks, in line with DfE Cyber Security Standards for Schools (2024).
Filtering and Monitoring	Technical and procedural systems that restrict access to harmful online content and identify concerning activity on the school network.
Professional Curiosity	An open and questioning approach used by staff to explore concerns and seek clarification about a child's circumstances rather than making assumptions.
Early Years Foundation Stage (EYFS)	Statutory framework for children aged 0–5 years, setting standards for learning, development, and welfare.
DSL Record Keeping	Maintaining accurate, factual, and secure records of safeguarding concerns and actions, stored separately from the main pupil file.

CPOMS	The secure online platform used by the school to log and monitor safeguarding and pastoral concerns.
LADO (Local Authority Designated Officer)	The officer responsible for managing and overseeing allegations against adults working with children.
MAST (Multi-Agency Support Team)	The Tower Hamlets multi-agency front door for advice, early help, and child-protection referrals.
CPAL (Child Protection Advice Line)	Tower Hamlets advice line offering immediate guidance on child-protection concerns.
Operation Encompass	Police-led initiative notifying DSLs when a child has been involved in, or present at, a domestic-abuse incident.
Private Fostering	When a child under 16 (18 if disabled) is cared for by someone who is not a parent, guardian, or close relative for 28 days or more.
Young Carer	A person aged 18 or under who provides regular care or support for a family member with illness, disability, mental-health, or substance-misuse issues.
Modern Slavery	Encompasses human trafficking, slavery, servitude, and forced or compulsory labour.
Child Abduction	The unauthorised removal or retention of a child from a parent or lawful guardian.
Significant Incident	Any event that poses, or has the potential to pose, a risk to the safety, welfare, or reputation of a child or the school.
Information Sharing	The process of exchanging data between professionals to protect children and promote welfare, in line with UK GDPR and Information Sharing Advice for Practitioners (2024).
Confidentiality	Respecting private information while understanding that it may need to be shared to protect a child from harm.
DSL Escalation	The formal process for challenging decisions made by other professionals when a child remains at risk, using the THSCP Escalation and Resolution Policy.
Whistleblowing	Reporting concerns about the conduct of colleagues or the organisation where safeguarding, illegal, or unethical behaviour is suspected.

Looked-After Child (LAC)	A child in the care of the local authority under s.31 or s.20 of the Children Act 1989.
Previously Looked-After Child (PLAC)	A child no longer looked after because of adoption, special guardianship, or child-arrangements order, but who remains vulnerable.
Pupil Voice	The systems and opportunities through which children express their views, contribute to decision-making, and influence school culture and policy.

Appendix 4: Further information on signs of abuse

Physical Abuse

Physical Signs	Behavioural Signs
• 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	• 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
• Eating disorders, including obesity or anorexia • Speech disorders (stammering) • Nervous disorders (rashes, hives, facial tics, stomach aches)	• 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
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Sexual Abuse

Physical Signs	Behavioural Signs
• 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	• 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 • Truancy • Regressive behaviours (bed-wetting/ fear of dark)

Neglect

Physical Signs	Behavioural Signs
• 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	• Erratic attendance at school • Chronic hunger or tiredness • Having few friends • Assuming adult responsibilities

Child Sexual Exploitation (CSE)

Physical Signs	Behavioural Signs
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• Tiredness or mood swings • Bruising • Sexually transmitted diseases • Pregnancy	• 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
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Child Criminal Exploitation (CCE) and County Lines

Physical Signs	Behavioural Signs
• See sections on physical and sexual abuse • Carrying weapons	• Self-harming • Persistently absent 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 • Significant decline in school performance • Gang association or isolation from friendship groups or social networks

Female Genital Mutilation (FGM)

Physical Signs	Behavioural Signs
• Difficulty walking, sitting or standing • Bladder or menstrual problems • Severe pain and bleeding • Infections such as tetanus, HIV and hepatitis B and C	• 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
• Cut or shaved hair as a form of punishment for being disobedient	• 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

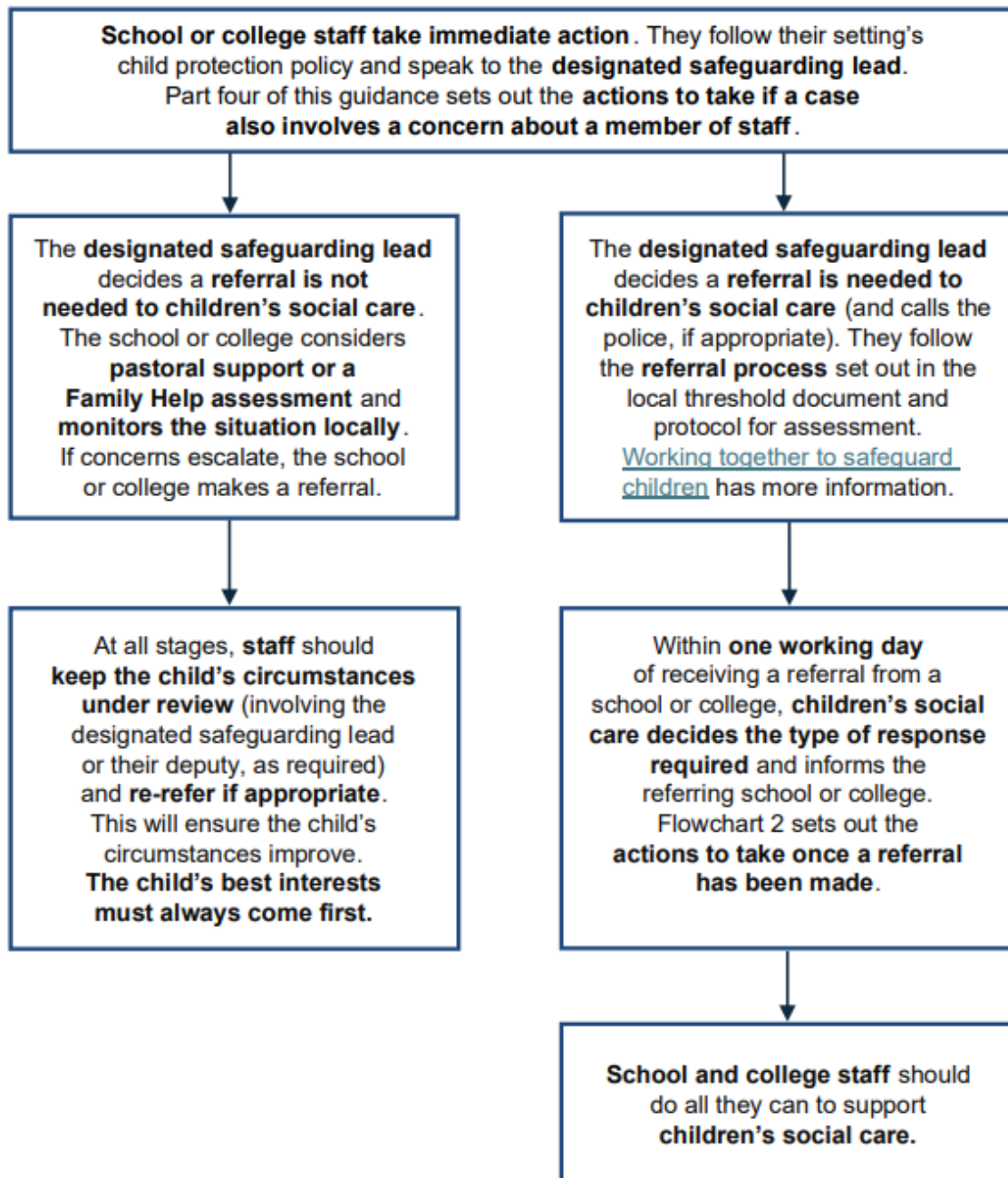
Physical Signs	Behavioural Signs
• Unexplained Injuries or Health Changes • Changes in Appearance and Possessions • Physical Intimacy Indicators • Anxiety Around Devices or People • See section on Sexual Abuse	• Spending increasingly prolonged time online • Having older boyfriends or girlfriends • Secretiveness 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 • Using drugs and/or alcohol • Going missing from home or absent school

Radicalisation

Physical Signs	Behavioural Signs
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• Out of character changes in dress, behaviour and friendship groups	• 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
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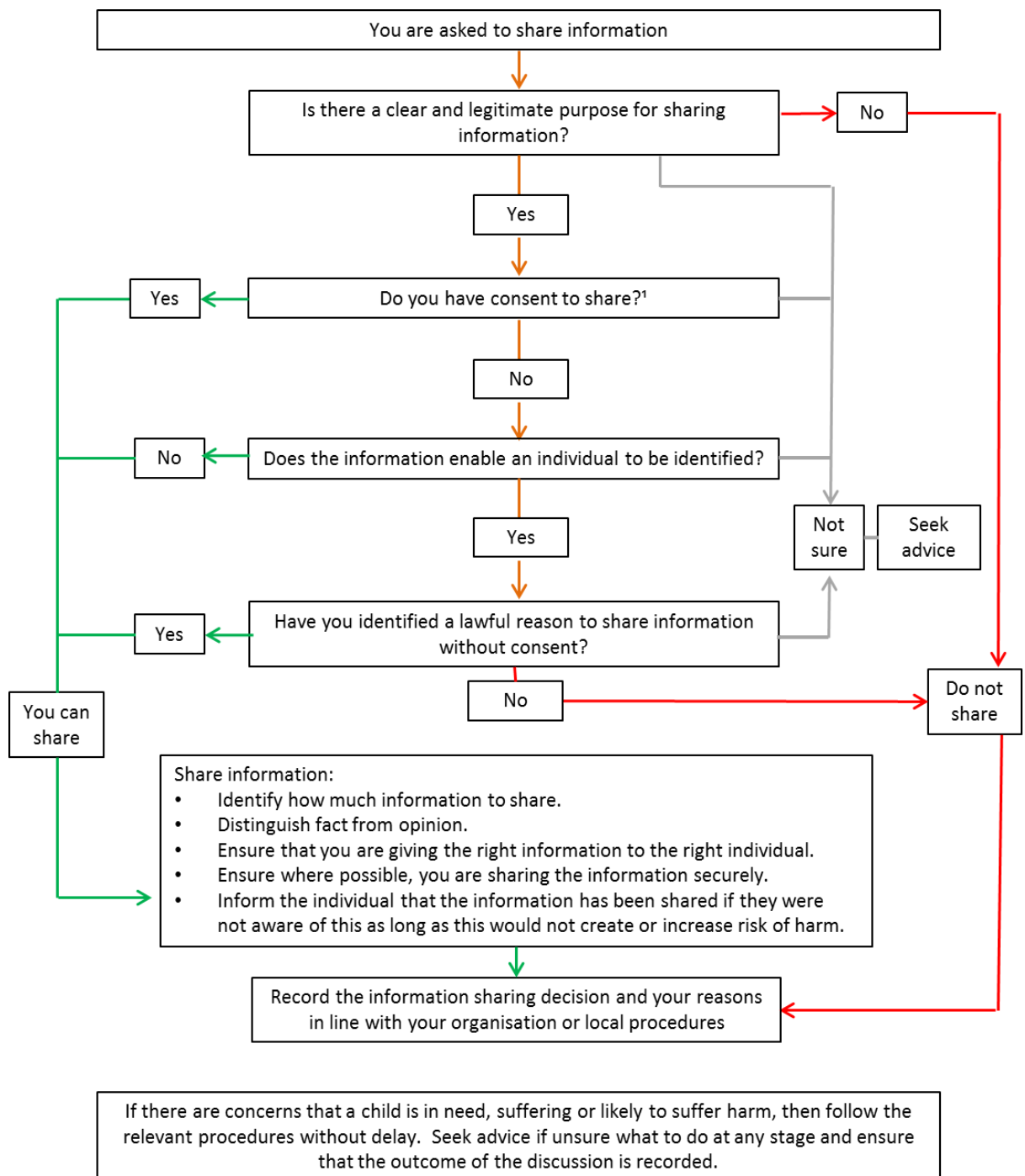
Appendix 5: Actions where there are concerns about a child – KCSIE 2026



Source: Department for Education, *Keeping Children Safe in Education 2026*, Figure 1: "Flowchart setting out the actions taken where there are concerns about a child", p. 26.

- In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of KCSIE 2026.
 - **Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the Family Help process.**
 - Referrals should follow the process set out in the local threshold document and local protocol for assessment. See *Working Together to Safeguard Children*.
 - Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in *Working Together to Safeguard Children*.
 - This could include applying for an Emergency Protection Order (EPO).
-

Appendix 6: Information Sharing



Appendix 7: Designated Safeguarding Lead (DSL) and Deputy DSL (DDSL) Job Description

Statement of Commitment

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

This job description aligns with *Keeping Children Safe in Education (2026)* – Annex B and outlines the key statutory responsibilities of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs).

Summary of the Role

- To take lead responsibility for safeguarding and child protection (including online safety) across the School and to support all other staff in dealing with any child welfare or 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 certain activities of the DSL may be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL and cannot be delegated.
- To take part in strategy discussions and inter-agency meetings, support other staff to do so, and contribute to the assessment of pupils.
- To promote and safeguard the welfare of pupils in the School at all times.

Managing Referrals

The DSL is expected to:

- Refer cases of suspected abuse of any pupil to the local authority children's social care (Tower Hamlets).
- Support staff who make referrals to children's social care.
- Refer cases to the Channel programme where there is a radicalisation concern and support staff who make such referrals.
- Refer cases where a person is dismissed or leaves due to risk/harm to a child to the Disclosure and Barring Service (DBS).
- Refer cases where a crime has been committed to the Police.

Working with Others

The DSL is expected to:

- Act as a point of contact with the three safeguarding partners: the local authority (Tower Hamlets), the Integrated Care Board, and the Police.
- Liaise with the Headteacher to inform her of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
- Liaise, as required, with the “case manager” (as per Part 4 of KCSIE) and the Designated Officer (LADO) for child protection concerns involving staff.
- Liaise with staff (particularly pastoral staff, IT staff, First Aiders, and the SENDCo) on matters of safety and safeguarding, including online safety, and when deciding whether to make a referral.
- Act as a source of support, advice, and expertise for all staff.
- Provide termly safeguarding reports to the Safeguarding Link Governor and the Governing Body.

Training, Knowledge and Skills

The DSL and DDSLs must:

- Undertake appropriate child protection training, updated every two years, and Prevent awareness training.
- Supplement and refresh their knowledge and skills at least annually to keep up to date with developments relevant to their role.
- Understand local assessment processes for early help and statutory intervention.
- Have a working knowledge of local authority case conference and review procedures.
- Ensure all staff, including new and part-time staff, understand the School’s safeguarding policy and procedures.
- Be alert to the specific needs of children in need, those with SEND, and young carers.
- Understand and apply data protection and information-sharing legislation (Data Protection Act 2018 and UK GDPR).
- Maintain detailed, accurate, and secure records of concerns and referrals.
- Understand the Prevent Duty and provide advice to staff on protecting children from radicalisation.
- Understand online-safety risks, including those faced by pupils with SEND, and support children to stay safe online.
- Access relevant resources and attend refresher training as needed.
- Promote a culture of listening to pupils and taking account of their wishes and feelings in all safeguarding actions.

Raising Awareness

The DSL is expected to:

- Ensure that the School's safeguarding policies are known, understood, and used appropriately.
- Oversee the annual review and regular updating of safeguarding policies and procedures, liaising with the Governing Body.
- Ensure that the policy is available publicly and that parents understand the School's safeguarding responsibilities and referral procedures.
- Link with local safeguarding partner arrangements to share training opportunities and updates.
- Help promote educational outcomes for pupils with safeguarding or child protection needs by sharing relevant welfare information with teachers and leadership staff, including:
 - Ensuring the School knows which pupils have or had a social worker;
 - Maintaining high expectations and aspirations for these pupils; and
 - Supporting staff in identifying additional support or adjustments to help these pupils achieve.

Child Protection Files

The DSL is expected to:

- Ensure that when a pupil leaves the School, their child protection file is transferred securely and promptly to the new school.
- Ensure files are transferred separately from academic records, in a secure manner, and that receipt is confirmed by the destination school.
- Consider sharing relevant safeguarding information with the new school prior to transfer, where appropriate.

Availability

The DSL must:

- Ensure that during term time, either the DSL or a DDSL is always available during the school day for staff to discuss safeguarding concerns.
- Arrange adequate and appropriate cover arrangements for any out-of-hours or out-of-term activities.
- In emergencies, ensure staff know how to contact the DSL or a member of the safeguarding team by phone.

Accountability and Oversight

- The DSL reports directly to the **Headteacher**, who holds overall strategic responsibility for safeguarding and child protection within the School.
- The Governing Body has a duty to ensure that safeguarding arrangements are effective and will receive regular updates from the DSL.

Review

This job description will be reviewed annually, or sooner if required, in line with updates to *Keeping Children Safe in Education* or changes to local safeguarding arrangements.