









Gatehouse School

Safeguarding and Child Protection Policy

Approved by the Designated Safeguarding Lead:

(Fiona Tighe) Date: 3/9/2024

ROLE	STAFF MEMBER	PHOTO	Location and Phone Number
Designated Safeguarding Lead	Mrs Fiona Tighe		DSL ROOM 100 6M class 651
Head Teacher	Mrs Sevda Korbay		Head's office 200
Deputy Head Teacher DSL	Mrs Conti Moll		Deputy Head's Office 209
Deputy DSL EYFS	Ms Aileen Reidy		Nursery 210 or 211
Deputy DSL SEND	Mrs Jenni Veitch		SEND office 371
Deputy DSL Medical	Ms Iveta Cingelova		Medical Room 001

The Senior Mental Health Lead is our Pastoral Care Lead, Ms Pauline Moisy



Approved by Governor Body	September 2024
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1: Introduction and Ethos: Core Safeguarding Principles

- 1.1 Gatehouse School is committed to safeguarding and promoting the welfare and wellbeing of children and staff. We believe everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The School recognises that children learn best when they are healthy, safe and secure.
- 1.2 Safeguarding and promoting the welfare of children is defined as : protecting children from maltreatment; preventing impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education, September 2024.)
- 1.3 This policy applies to all pupils in the School, including those in the EYFS. It will be reviewed annually , unless an incident or new legislation or guidance calls for the need for an immediate review.
- 1.4 The purpose of this policy is to inform all staff (including supply staff), parents,(including guardians and carers), contractors, volunteers and governors about the School’s responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with pupils, even where this is away from the School, such as on educational visits or when delivering lessons online..
- 1.5 This policy is accessible to all staff and is published on the School website and is available to parents of current and prospective pupils from the School’s office or from the Designated Safeguarding Lead, Fiona Tighe, on request. It is also included in the staff induction pack. Large print or other accessible formats can also be made available.
- 1.6 The procedures in this policy apply to all staff, volunteers, visitors and governors. The policy is written in accordance with Keeping Children Safe in Education 2024 and reflects local safeguarding arrangements, including the Tower Hamlets Safeguarding Children Partnership Supplementary Guidance documents on Child Protection Procedures and the Management of Allegations and Concerns that do not meet the harm threshold.

2: Purpose and Principles of Policy

To ensure all pupils on the school roll are effectively safeguarded including those pupils in alternative placements.

Gatehouse School will provide all staff with key information to enable them to identify safeguarding concerns and know what action to take in response. We will ensure that consistent good practice is carried out throughout the school. We will demonstrate our commitment towards safeguarding, to the whole community: pupils, parents and other partners.

Gatehouse School is committed to safeguarding and promoting the welfare of all pupils in our care, and expects all staff, governors and volunteers to share this commitment. To achieve this, the School seeks to create a safe school environment and a strong pastoral system where pupils who have been subject to any form of abuse can report the matter confident that it will be taken seriously. They will not be made to feel ashamed of making a report and will be fully supported. Staff are trained to listen to pupils’ concerns, identify issues early and respond appropriately following agreed procedures. The School will consider, at all times, what is in the best interest of the child and act accordingly.

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

Teaching pupils to keep themselves safe

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

online safety (cyber-bullying and sexting),

radicalisation,

grooming,

child sexual exploitation,

healthy and respectful relationships,

boundaries and consent,

stereotyping, prejudice and equality, including teaching that Gatehouse School has Zero tolerance towards transphobia.

body confidence and self esteem

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

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

mental health,

substance misuse and bullying.

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

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

The School will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the School's Safer Recruitment Policy;
- ensure that, where staff from other organisations are working with our pupils on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;

- follow the inter-agency procedures of the Tower Hamlet Safeguarding Children Partnership and contribute to inter-agency working;
- support pupils in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach;
- be alert to signs of abuse, both in the School and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
- consider whether children are at risk of abuse or exploitation in situations outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.
- deal appropriately with every suspicion or complaint of abuse and support pupils who have been abused in accordance with their agreed child protection plan;
- design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations;
- be alert to the needs of pupils with physical and mental health conditions;
- operate robust and sensible health and safety procedures;
- operate clear and supportive policies on drugs, alcohol and substance misuse;
- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- take all practicable steps to ensure that School premises are as secure as circumstances permit;
- teach pupils about safeguarding issues and about how to keep themselves safe (including on-line); and when working from home online
- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.
- Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

3: Safeguarding Legislation and Guidance

The policy is drafted in accordance with all relevant legislation and the following statutory guidance:

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

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

The policy is drafted in accordance with all relevant legislation and the following statutory guidance:

- Section 157 of the Education Act 2002 (Independent schools only, including academies and Free Schools)
- The Education (Independent School Standards) Regulations 2014 (Independent schools only, including academies and Free Schools)

- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- 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 GDPR
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2023 (HM Government December 2023, Updated 23 rd February 2024)
- Keeping Children Safe in Education 2024 (Department for Education, 2 nd September 2024)
- Information Sharing: advice for practitioners providing safeguarding services (Department for Education, May 2024)
- What to do if you're worried a child is being abused 2015 (Department for Education, March 2015)
- Early Years Foundation Stage Statutory Framework (4 th January 2024)
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014)
- The Teacher Standards 2012

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

4 : Legislation and Guidance

TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP SUPPLEMENTARY SAFEGUARDING GUIDANCE

The following Pan-London and THSCP safeguarding guidance has informed the content of this policy:

- **London Child Protection Procedures revised 7th Edition (London Safeguarding Children Board) 25th April 2024**
- **Tower Hamlets Safeguarding Children Partnership Levels of Need Guidance (September 2023)**
- **Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Child Protection Procedures - September 2024**
- **Tower Hamlets SCP LADO Procedures and Flowchart re Allegations made against staff working in the children's workforce - Information about reporting and managing allegations**
- **Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Managing Allegations of Abuse against Staff and Concerns that do not meet the harm threshold – September 2024**
- **Tower Hamlets SCP Multi-Agency Escalation and Resolution Policy**

5: Tower Hamlets Safeguarding Children PARTNERSHIP

The Children Act 2004 as amended by the Children and Social Work Act 2017 has brought about the establishment of the Tower Hamlets Safeguarding Children Partnership (THSCP). The Partnership coordinates the work of all agencies and ensures that this work is effective in achieving the best outcomes for Tower Hamlets children. The

three statutory safeguarding partners have published arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. More information about the Tower Hamlets Safeguarding Children Partnership can be found on the website:

https://www.towerhamlets.gov.uk/lgnl/health_social_care/children_and_family_care/Safeguarding-Children-Partnership/Safeguarding-Children-Partnership.aspx

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

The school is committed to engaging with the THSCP multi-agency safeguarding training offer and the borough's Designated Safeguarding Leads Forums, participating in THSCP/LA's Section 175/157 School Safeguarding Audit Cycles, providing key information about children relevant to keeping children safe, and participating fully in the Rapid Review process and Child Safeguarding Practice Reviews.

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

6: Key definitions

Safeguarding and promoting the welfare of children is:

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

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

'Child' includes everyone under the age of 18.

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

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

7: Roles and responsibilities

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

- contribute to providing a safe environment in which children can learn;
- consider at all times the best interests of the pupil and take action to enable all pupils to have the best outcomes;

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

The Designated Safeguarding Lead (DSL)

The School has appointed a Designated Safeguarding Lead (DSL), Fiona Tighe, who is a senior member of staff and member of the School's leadership team. The DSL takes lead responsibility for safeguarding (including on-line safety and understanding the filtering and monitoring systems and processes in place) and child protection and is the first point of contact for parents, pupils, staff and others if they have any concerns about safeguarding or child protection. The School also has four Deputy DSLs, ensuring that there is always an appropriately trained and designated person in the School at all times.

The DSL will be given the time, funding, training resources and support to ensure they are able to fulfil all the key aspects of their as described in KCSIE (SEPT 2023)

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

- **Working with others:** the DSL will be the principal point of contact for all staff and when co-ordinating different departments and functions within and outside the School in the management of a case. They will promote supportive relationships with parents and carers to safeguard pupils' welfare, be able to identify the causes and consequences of issues that children are experiencing and to support staff to make appropriate adjustments in the provision of educational programmes.
- **Information sharing and managing the child protection file:** the DSL is responsible for keeping child-protection files up to date with accurate and complete records of any actions or decisions taken and ensuring these confidential records are securely stored and, where appropriate, transferred to a new school promptly.
- **Raising Awareness:** the DSL is responsible for reviewing and updating the School's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and for ensuring that parents can access the policy and know that the School may make referrals where abuse or neglect is suspected.
- **Training, knowledge and skills:** the DSL will receive the appropriate level of training, together with regular updates, to ensure they are able to understand the unique risks associated with online safety, to be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst

they are online at school or School and to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.

- **Providing support to staff:** the DSL should receive sufficient support and training so that they can support staff and help them feel confident on welfare, safeguarding and child-protection matters, including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support.
- **Understanding the views of children:** the DSL should, through training, develop the knowledge and skills needed to encourage a culture of listening to children and taking account of their wishes and feelings among all staff. They should promote an understanding of the difficulties that children may have in approaching staff about their circumstances and help staff consider how to build trusted relationships which facilitate communication.
- **Understanding the rights of the child:** the DSL will be aware of the requirement for children being investigated by police to have an appropriate adult in attendance in accordance with PACE code C statutory guidance.

Deputy Designated Safeguarding Leads (DDSL)

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

Head Teacher

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

- the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- the allocation of sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively is given, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- matters which affect pupil welfare are adequately risk assessed by appropriately trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
- systems are in place for children to express their views and give feedback which operate with the best interests of the child at heart;
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy;
- pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- ensure safer recruitment procedures in line with Part 3 of KCSIE, September 2023 are being adhered to;
- they act as case manager and liaise with Local Authority Designated Officer (LADO) before taking any action and on an ongoing basis, where an allegation has been made against a member of staff or volunteer; and
- they notify the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority of anyone who has harmed or may pose a risk to a child.

Governing Body

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

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

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

1.8 Safeguarding Governor

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

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

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

8: RIGHTS OF THE CHILD

The school upholds the Human Rights of the child in accordance with the Human Rights Act 1998.[1] It is unlawful for schools to act in a way that is incompatible with the European Convention on Human Rights. Specifically, the

school embeds and upholds the following Convention rights of the child across its safeguarding policies and procedures:

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

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

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

Protocol 1, Article 2: protects the right to education.

In accordance with the Equality Act 2010, Gatehouse does not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Please refer to the school's Equality Policy]. Gatehouse is committed to supporting and taking positive action towards children with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race- who may be at a disadvantage and be disproportionately vulnerable.

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

In accordance with the 2010 Equality Act, the school will not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Gatehouse School has a Zero tolerance policy towards any discriminatory, derogatory or phobic attitude or comments in relation to the protected characteristics. This includes Transphobia. The school is committed to supporting and taking positive action towards children with regard to protected characteristics who may be at a disadvantage and be disproportionately vulnerable.

As evident in the Serious Case Review Child Q, the school is aware that children from ethnically diverse groups are at risk of adultification whereby their vulnerability as a child is reduced or set aside because of racial bias and stereotypes impacting professional judgement.[2] All staff share in the whole school's commitment to ensure equity, diversity and inclusion remain at the centre of the school's safeguarding culture, so that all children receive the care, support, and protection they have the right to receive.

The school shares the London Borough of Tower Hamlet's commitment to being an anti-racist borough and to tackle and eliminate race discrimination. The council's Black, Asian, and Minority Ethnic Inequalities Commission (2021) concluded that racism still exists within institutions and structures in the borough and has developed an action plan to achieve race equality at pace.[3] The action plan recognises that schools have a powerful and significant role in changing narratives and bringing about social change through education.

[1] <https://www.equalityhumanrights.com/en/human-rights>

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

[3] https://www.towerhamlets.gov.uk/ignl/community_and_living/Inequality-Commission/Black-Asian-and-Minority-Ethnic-Inequalities-Commission.aspx

9: Children who may be potentially at more Risk of Harm

All staff should recognise that all children are vulnerable but that some children may be more vulnerable than others and at more risk of harm. Children known to a Social Worker, Looked After Children and Care Leavers are likely to have suffered abuse at some point in their childhood and may be more vulnerable to further abuse including exploitation. Staff need to be aware that other children who may be potentially more at risk of harm include a child who:

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

10: CHILDREN IN NEED OF A SOCIAL WORKER

Children who have been allocated a social worker may have experienced abuse including neglect and belong to a family that has many complex circumstances. Staff should recognise that these children will have experienced adversity and trauma that can leave them vulnerable to further harm, as well as educationally disadvantaged, and have a negative impact on their attendance, learning, behaviour and mental health.

When making decisions about safeguarding, carrying out a risk analysis, making a safeguarding response to concerns such as unauthorised and persistent absence, and providing pastoral and academic support, the school will take seriously the fact that the child in need of a social worker will require enhanced pastoral and academic support alongside that provided by statutory services. Gatehouse is also committed to providing further pastoral and academic support to children who have had historic contact with a Social Worker, in recognition that the abuse and trauma is likely to have an impact on the child beyond the duration of the involvement of statutory services.

Gatehouse will cooperate with the Tower Hamlets Virtual School, which now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children known to a social worker.

The DSL will liaise with teachers regarding specific programmes of study to support the child.

11: Mental Health

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

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

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

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

12: LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN

The most common reason for children becoming looked after by the Local Authority is as a result of abuse including neglect. Staff need to have the skills, knowledge and understanding to safeguard

Looked After Children and Previously Looked After Children in recognition of their heightened vulnerability.

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

The Designated Teacher is Conti Moll, who will work with the Virtual School Headteacher to safeguard and promote the educational outcomes of Looked After Children and Care Leavers. This action will include putting robust teaching and learning plans in place, working closely with the Pastoral Care Lead.

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

13. SEND CHILDREN

Children with special educational needs and disabilities (SEND) or physical health issues can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include: professionals and other adults making assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration the potential for children with SEN and disabilities or certain medical conditions being vulnerable to experiencing friendship group exclusion and isolation and being disproportionately impacted by behaviours such as bullying (including prejudice-based bullying), without outwardly showing any signs; children not understanding that what is happening to them is abuse; and communication barriers when reporting abuse and difficulties in overcoming these barriers.

For some disabled children, their dependency on parents and carers for practical assistance in daily living, including intimate personal care, may increase their risk of exposure to abusive behaviour. Some children may also have an impaired capacity to resist or avoid abuse.

Further information on safeguarding SEND children is available in the non- statutory guidance

Safeguarding Disabled Children (2009),

NSPCC Safeguarding Children with Special Educational Needs and Disabilities (May 2022), and NSPCC Safeguarding d/Deaf Children and Children who have disabilities at greater risk of abuse (June 2024),

Staff should speak with the DSL and SENDco in the first instance.

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

advice is tailored to their individual needs.

The DSL and SENDco, (deputy DSL), and the School Nurse(deputy DSL) will work closely together to support and safeguards SEND pupils, including children who have physical health conditions and ensure measures are in place to make safeguarding systems accessible to all children. Staff should be vigilant when working with SEND pupils and be aware of what needs to be done to ensure the known barriers are overcome.

14: Children Absent from Education and Missing Education

The school closely monitors attendance, absence, suspensions, and exclusions. A child going missing absent from education, whether prolonged or on repeat occasions, can be a vital warning sign of a wide range of

safeguarding issues and is a potential indicator of abuse and neglect, including child sexual abuse, child sexual exploitation, and child criminal exploitation (county lines) or mental health problems.

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

Children absent from education procedures at Gatehouse

The School has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the Local Authority pupils who are absent from school for more than 10 school days (continuous). Unauthorised Absence Procedures (If a pupil's absence is not reported:)

- We will try to contact parents by phone by 9.30am
- If we cannot reach parents by phone we will email
- If we have no response to the email, we will send a text message asking the parent to contact the school
- If we have no response to the text, we will phone authorised contacts listed on the pupil contact form to advise them that the child is not in school and that we have not been notified of a reason.
- When a pupil does not return to school and the whereabouts of the child and their family are not known, the

school will make reasonable enquiries

- If we have no response from any contact by 12:00 midday, we will refer the child to the Attendance and Welfare Advisor at Tower Hamlets to support with those enquiries to ascertain the child's whereabouts, and only after these steps have been taken refer to the Local Authority using a Missing Children referral form.
- Contact: LBTH CME Officer, Tower Hamlets Education Safeguarding Service
Nasihah.Anwer@towerhamlets.gov.uk 020 7364 3426 / 07562 431817
- Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Pupils who are unwell and absent:

- The school nurse will contact the parents of any absent pupil to ascertain the reason for absence if the pupil is unwell, if no explanation of the illness has been given.
- Once a pupil's whereabouts/reason for absence have been established, it is the responsibility of the School Receptionist, or their substitute, to complete the entry for the given period on the registration system. This is a matter of priority.
- Every child's attendance should be 95% or above. This is monitored by our Safeguarding Lead on a weekly basis.
- 95%-100% is the expected attendance level
- 90%-95% is an emerging cause for concern. The DSL will email the parent to alert them of our concerns..
- 85%-90% is a cause for concern. The DSL will call the parent to discuss our concerns.
- Below 85% is a serious cause for concern. Parents will be invited to attend a meeting.

At Gatehouse, we will refer children to the DSL if they are missing or absent from education for prolonged periods and/or repeat occasions. See our Children Absent from School Policy and Attendance Policy. for full details.

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

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

**Note: In line with KCSIE 2024, it is the School's policy to hold a minimum of two emergency contact numbers for each pupil.*

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

15: Elective Home Education

The school recognises that parents have a legal right to electively home educate their child at home; however, it is expected that the parents' decision to do this is made with their child's best education and best interests at its heart. Staff should be aware that even though most home educated children have a positive experience, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. When a parent informs the headteacher of their intention to electively home educate their child, the school will convene and coordinate a meeting between the LA, relevant school staff, parents and all key professionals currently working with the child and family. In accordance with LBTH Policy this meeting has to occur before any final decision is made by the parents, to ensure that the best interests of the child have been taken fully into account and carefully considered. The occurrence of this meeting is especially important when the children have known vulnerabilities including Children known to a Social Worker and SEND children.

There may be exceptional circumstances where a pupil has to be educated from home. For example, during a pandemic, due to recovery from surgery or because of a communicable disease. The school will maintain contact with the family during this period and will endeavour to have sight of the pupil, where possible, by Zoom.

16: Whistleblowing

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. Staff should feel confident that such concerns will be taken seriously by the Senior Leadership Team and governing Board. Please refer to the Whistleblowing Policy.

17: Allegations about members of staff (including supply staff) and volunteers

1.10 Guidance to staff

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

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

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

1.11 The following procedures will be used where it is alleged that a member of staff or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child;
 - behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children;
- or

- behaved or may have behaved in a way (in or outside of School) that indicates they might not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (eg domestic violence at home).

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

1.12 Reporting an allegation about staff

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

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

1.13 Action to be taken by the case manager

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

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

- Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.
- Any allegations of serious harm or abuse by any person living, working or looking after children in the nursery or EYFS years (whether that allegation relates to harm or abuse committed on the premises or elsewhere) will be notified to Ofsted as soon as practicable (and within 14 days at the latest), and include details of the action taken in respect of the allegations.
- Where an adult makes an allegation to the School that they were abused as a child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a pupil will be reported to the LADO in line with Tower Hamlets procedures for dealing with such allegations. The LADO will then coordinate with the children's social care and the police.
- Where a staff member feels unable to raise an issue with their employer, or
- feels that their genuine concerns are not being addressed, they should
- consider other channels available as set out in the Government's List of
- Prescribed Bodies and Persons including:
- The NSPCC Whistleblowing Advice Line 0800 028 0285 which is free &
- anonymous, more information can be found at [nspcc.org.uk/whistleblowing](https://www.nspcc.org.uk/whistleblowing).

1.14 Disclosure of information

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

1.15 Investigation

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

with the LADO, police and/or children's social services. The supply teacher will be advised to contact their trade union for representation. If there is an allegation meeting it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School.

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

1.16 Support

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

1.17 Suspension

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

1.18 Confidentiality

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

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

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

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

1.19 Malicious and unsubstantiated allegations

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

1.20 Record keeping and references

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

1.21 Dismissals and resignations

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

teachers and Teacher misconduct: the prohibition of teachers (as updated from time to time) to decide whether a referral should be made.

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

Reporting of allegations against staff and concerns that do not meet the harm threshold:

Allegations of harm may indicate that a person who works with children might pose a risk of harm to children if they continue in that role. When an allegation is made against a member of staff including supply staff and volunteers, the school's Managing Allegations Procedures should be followed, and all action taken needs to be in line with KCSIE 2024 Part 4 and the THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – September 2024

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

A concern that does not meet the harm threshold is any concern – no matter how small, and even if no more than causing a sense of unease or a nagging doubt – that an adult has acted in a way that:

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

NB: The term "**a concern that does not meet the harm threshold**" does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE

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

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

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

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

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

All staff must report all allegations, irrespective of the source, directly to the headteacher and ensure that it is put in writing, signed and dated. If the subject of the allegation is the headteacher, then the allegation should be directly reported to the Chair of Governors.

On receipt of a report of an allegation, the headteacher/DSL will make immediate contact with the Local Authority Designated Officer for an initial discussion. If the allegation concerns the headteacher, then the Chair of Governors shall make contact with the LADO.

When an allegation is made against a supply member of staff, the headteacher/DSL will be the case manager and take the lead in contacting the LADO.

When schools receive a report of an allegation relating to an incident that happened when an individual or external organisation was making use of the school premises for activities involving children, the headteacher will seek the advice of the LADO.

Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the police.

LBTH Local Authority Designated Officer (LADO): Melanie Benzie

Email: Melanie.Benzie@towerhamlets.gov.uk or LADO@towerhamlets.gov.uk

Telephone: 0207364 0677

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

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

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

The Staff Code of Conduct sets out the expectations of Gatehouse staff.

All staff should understand their responsibility to report **all concerns** about staff conduct which has taken place at the school or outside of the school including online environments, no matter how small or insignificant they might be perceived to be.

All **concerns that do not meet the harm threshold**, including those determined to be unfounded, will be recorded in writing by the Head Teacher. The record will include details of the concern, the context in which the concern arose, and any actions taken and decisions reached (and the rationale for them), and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by the School.

Concerns that do not meet the harm threshold which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the School. However, **concerns that do not meet the harm threshold** (or group of concerns) have met the threshold for referral to the LADO and found to be substantiated, it will be referred to in the reference.

Records of **concerns that do not meet the harm threshold** will be reviewed at least termly by the DSL, Head Teacher and Chair of Governors to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future.

18: STAFF SAFEGUARDING TRAINING INCLUDING TRAINING FOR GOVERNORS

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

Gatehouse School offers all staff In-house Safeguarding training provided by the DSL on the first training day of each year. Induction training by the DSL to all newly employed staff is also given. Prevent on-line training is provided by Tower Hamlets, Update training annually on Keeping Children Safe in Education changes including on-line safety and monitoring of use of electronic devices in school.

For governors and peripatetic teachers, on-line training delivered by ECP (Education Child Protection).

Anyone who misses training or is absent for training is given the training as soon as reasonably possible after the missed training date.

Updates to safeguarding including internal reviews of practice are discussed in weekly staff briefings and recorded in the meeting minutes.

1.22 Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse and neglect are concerned.

1.23 Induction training for all new members of staff, including temporary employees or volunteers, includes formal child protection training which covers:

- this safeguarding policy and related policies on anti-bullying, e-safety, child-on-child abuse, mental health and wellbeing
- Part 1 and Annex A of KCSIE;
- the role, identity and contact details of the DSL and Deputy DSLs;
- policies on acceptable use of IT and online safety*; including when they are online at home
- the pupil behaviour policy*;
- the School's 'Children who are Absent from Education Policy';
- the staff Code of Conduct*;
- the School's policy on Whistleblowing*; and
- an overview of Tower Hamlets Safeguarding Children Partnership's procedures.

* Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them. A

proportional, risk-based approach will be taken to determine the level of information provided to temporary staff and volunteers.

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

1.24 All staff receive updated copies of the School policies referred to above and are required to confirm that they have read and understood them. In addition, Part 1 and, where appropriate, Annex A of KCSIE are reissued to staff whenever this statutory guidance is updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further reading on the staff section of the School's server.

1.25 The DSL team will regularly assess the appropriate level and focus for staff training so that it can respond to specific safeguarding concerns such as mental health, online safety, radicalisation, child sexual exploitation, Child criminal exploitation, sexual violence and harassment, and female genital mutilation.

1.26 The DSL and Deputy DSLs have undertaken Designated Child Protection Safeguarding training and training in locally-agreed inter-agency procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and will be updated every two years. Additional specialist training will be provided to those who have specific responsibility for safeguarding in the EYFS or for Looked After Children. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:

- keep abreast of best practice for promoting a culture of listening to children;
- remain up to date on the mechanics of inter-agency working as operated by Tower Hamlets Local Safeguarding Children Partnership;
- understand the assessment process for providing early help and intervention, for example through locally-agreed common and shared assessment processes such as early help assessments;
- have an up-to-date working knowledge of how local authorities conduct a child protection case conferences so they can contribute to these effectively when required to do so;
- be alert to the specific needs of children in need, those with special educational needs and young carers; The DSL will follow the LBTH guidance for schools, 'Young Carers in School: A guide for education practitioners to identify and support young carers in schools' (January 2023) and refer to the Young Carers program accordingly: Young.Carers@towerhamlets.gov.uk
- understand and support the School with regard to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation; and
- be able to keep proper written records of concerns and referrals.

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

19 Visitors

When visitors enter the premises through the secure gates and door, via the intercom, they enter the school reception area. Visitors are required to sign in to the visitor log book and asked to read our Safeguarding information for visitors. Visitors are informed of the names and roles of our Safeguarding team, by use of a visual poster. Visitors wear a lanyard during their visit and are escorted through the building at all times.

External speakers are vetted through the DBS system and checks of their social media accounts.

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

20 EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

All activities off-site are subject to a pre-visit and robust risk assessments being conducted. Risk assessments are checked and signed by all members of staff attending the activity and signed by the headteacher. Our Safeguarding Policy and procedures apply where there is direct management and supervision from our school staff.

For all residential trips, the DSL or Deputy DSL are in attendance to ensure all Safeguarding policies and practice are in place.

Where services or activities are provided separately by another organisation outside of normal school hours, the school will seek assurance that the organisation has effective safeguarding policies and procedures in place. This applies regardless of whether or not the children who attend any of these services or activities are pupils on the school register. The safeguarding standards expected of these external organisations, when they are not currently regulated, are set out in the Department for Education's Keeping Children Safe during community activities, after school-clubs and tuition: non-statutory guidance for providers running out-of-school activities (April 2022). The school will ensure that all safeguarding requirements are set out clearly in the lease or hire agreement with the organisation, as a condition of use and occupation of the school premises; and that failure to comply would lead to the termination of the agreement.

Hierarchy of intervention

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

1.29 Within the continuum, there are four levels of intervention:

Level 1: universal -Children with no additional needs

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

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

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

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

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

Level 4: Children with acute needs/ children at risk

These are children who are suffering or are likely to suffer significant harm. This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes. They may be vulnerable to risk on-line and/or off-line.

21: Identifying Abuse

1.30 All staff should be aware of the types and signs of abuse and neglect so that they are able to identify pupils who may be in need of help or protection. If staff are unsure, they should always speak to the DSL.

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

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

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

- Children who are missing or absent from education

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

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

The school's attendance policy sets out the protocols the school will follow.

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

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

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

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

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

Contextual safeguarding

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

22: Indicators of abuse

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

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

- the pupil discloses that he or she has been abused, or asks a question which gives rise to that inference
- a pupil's injury cannot be reasonably or consistently explained, or is unusual in type or location
- a pattern or frequency of injuries is emerging
- the pupil engages in extreme or challenging behaviour or there is a sudden change in the pupil's behaviour
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss reasons
- the pupil appears neglected (e.g. dirty, hungry, inadequately clothed)
- the pupil appears reluctant to return home or has been openly rejected by parents or guardians

- the pupil's development is delayed in terms of emotional progress
- the pupil withdraws emotionally – showing a lack of trust in adults
- the pupil shies away from being touched or flinches at sudden movements
- the pupil loses or gains weight

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

23: Pupil Voice

All those with a responsibility to safeguard children need to recognise that it takes great courage for a child to share a concern and speak up about any form of abuse especially child sexual abuse.

There are many reasons why children are not able to articulate what they are experiencing. Children may feel embarrassed, humiliated, or are currently being threatened by the perpetrator of abuse. Also, children may not feel ready or know how to tell a trusted adult that they are being abused, exploited, or neglected. They may not even realise that their experiences are harmful.

The barriers preventing a child communicating their concerns may be connected to their vulnerability, disability, sexual orientation, or language. The child's behaviour including misbehaviour may be the first sign that a child has experienced harm. Staff will therefore exhibit professional curiosity and understand that a child may be communicating a concern through their actions and behaviours and take a safeguarding approach when responding to behaviours.

Staff need to be aware of and promote the systems in place at the school which enable children to share their concerns and report abuse confidently. Children need to be assured that their concerns will be taken seriously by staff and action will be taken to safeguard and protect them. It is also important that staff determine how best to build safe and trusted relationships with children and young people which facilitates communication and the sharing of concerns.

Gatehouse School provides a range of opportunities for pupils to be listened to. These include form time, buddy and house systems, a School Council and a Pupil Leadership Team, Members of DSL teams, the Head of Pastoral Care and School Nurse are available at both break and lunch times for children to talk to. Pupil surveys are also carried out from time to time regarding general issues that may be of concern to pupils. Pupils have opportunities to ask to speak to someone whenever they feel the need to. This is encouraged.

24: Safeguarding Issues

The following sections refer to specific Safeguarding Issues. It should be recognised that a child may have complex issues, which cover more than one aspect of safeguarding.

25: Child sexual exploitation (CSE):

Child Sexual Exploitation is a form of child sexual abuse. CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

Apart from age, other factors that could make a child more vulnerable to exploitation include gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways of grooming a child in preparation for abuse including via the internet.

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

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

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

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

CSE risks to children are covered through our the PSHE and RSE curriculum

For further information staff can read the Home Office Statutory Guidance on

Child Sexual Exploitation as well as speaking to the DSL.

26: Child criminal exploitation Including County Lines.

Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual.

CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country through County Lines, forced to shoplift or pickpocket, or to threaten other young people.

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

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

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

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

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money.

Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

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

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office and The Children’s Society [County Lines Toolkit For Professionals](#).

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

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

27: SERIOUS YOUTH VIOLENCE

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

28: Online Harms

Children should have the right to explore the digital environment but also the right to be safe when on it. However, technology often provides the platform that facilitates harm, and the use of technology has become a significant component of many safeguarding issues. Examples of which include child sexual exploitation; child criminal exploitation; radicalisation; sexual predation/grooming; and forms of child-on-child abuse such as cyberbullying and nudes and semi-nudes.

In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, which can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In accordance with Behaviour in Schools: Advice for

Headteachers and School Staff (September 2022), the school promotes as part of its culture of excellent standards of behaviour that the same standards of behaviour are expected online as apply offline, and that every pupil should be treated with kindness, respect and dignity.

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

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

Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racism, prejudice-based content, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;

Contact: being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention of grooming or exploiting them for sexual, criminal; financial or other purposes;

Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (e.g. consensual or non-consensual sharing of nudes and semi-nudes), and/or pornography, sharing other explicit images and online bullying.

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

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). When there are concerns about a child in this area, staff should notify the DSL, who will consider referring the child into the Cyber Choices programme (cyberchoices.uk), which provides early intervention where children are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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

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

Technical - infrastructure/equipment, filtering and monitoring

Gatehouse is responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The named responsible persons for filtering and monitoring are:

Gatehouse SLT Member- Fiona Tighe DSL

Gatehouse Governor- Joanna Scott

- Gatehouse technical systems will be managed in ways that ensure that the school meets all the recommended technical requirements, including filtering and monitoring, across all devices.
- There will be an annual review and audit of our safety and security of the schools technical systems. There will be a review of the system if new technology is installed, if a risk is identified or if there is a change in working practice.
- Servers, wireless systems and cabling must be securely located and physical access restricted.
- Staff will not leave their computers or devices on when they are not in the room.
- All users will have clearly defined access rights to school technical systems and devices ● All users will be provided with a username and secure password by Vizst who will keep an up to date record of users and their usernames. Users are responsible for
 - the security of their username and passwordThe “master/administrator” passwords for the school ICT system, used by Vizst must also be available to the Bursar
 - Vizst is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
 - Internet access is filtered for all users. Filtering is not 100% effective and monitoring of use will include physical live viewing of systems, user log scrutiny and individual device monitoring.
 - Illegal content (child sexual abuse images) is filtered by actively employing Sophos web filtering. Content lists are regularly updated and internet use is logged and regularly monitored by Vizst.
 - Harmful and inappropriate content will be unblocked , without unreasonably impacting teaching and learning.
 - There is a clear process in place to deal with requests for filtering changesstaff send an email to Vizst and a log is kept of requests. The DSL oversees the unblocking request log as part of the monitoring strategies.
 - The school has provided enhanced/differentiated user-level filtering
 - Vizst staff monitor and record usage of the school technical systems and users are made aware of this in the Acceptable Use Policy
 - Users report any actual/potential technical incident/security breach to Vizst
 - Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data.
 - The school infrastructure and individual workstations are protected by up to date virus software Data Protection Please see the Data Protectio safeguarding needs.

Specific guidance related to remote provision and live sessions

Online Remote Learning

The only forum on which live sessions should take place is on Zoom (see Appendix 1 Correct Procedures for using Zoom) Remote Provision Protocol for Teaching Staff

1. All live sessions must be recorded. This is for safeguarding reasons.
2. When admitting children into your zoom sessions do this individually from the waiting room so you are sure you recognise every child’s contact details.
3. Do not have 1:1 conversations on video, except for scheduled 1:1 meetings. In live group sessions there must be at least 2 pupils present before they begin. A separate protocol is in place for those who normally work 1:1 with pupils (music teachers, SEN lessons etc)
4. To encourage normal working hours please do not post any online provision after 18:00 or before 07:00am.
5. If a pupil contacts you via google classroom and a response is required then you should respond within 2 working days.
6. When recording or live streaming sessions, make sure the background is neutral and nothing personal or inappropriate can be seen or heard in the background: a. No pictures of children on walls etc b. Be mindful of what

is visible behind you/in front of you c. Close all unnecessary programmes on your computer, particularly email, CPOMS. d. Do not have other people in the room when you are making a video or live streaming

7. Make sure that you are suitably attired.

8. When a zoom session is taking place, this must be hosted by the teacher. Conduct the conversation/session following the same professional protocols as you would in a 'normal' lesson.

Gatehouse is committed to ensuring that Online Safety is a running and interrelated theme throughout its safeguarding arrangements including policy and procedure, the curriculum, staff training and induction, the role of the DSL, and parental engagement. This includes promoting an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring systems in place when children access the internet via school devices and the school network.

As part of a whole school approach Gatehouse is committed to ensure that all parents have the opportunity to be empowered and upskilled in keeping children safe online through the sharing of Online Safety information, advice and guidance including the offer of workshops to support parents for example in installing safeguards on their children's digital devices.

<https://www.gatehouseschool.co.uk/wp-content/uploads/2023/12/Code-of-Conduct-for-Pupils-for-Online-Sessions-review-summer-23-1.pdf>

<https://www.gatehouseschool.co.uk/wp-content/uploads/2022/11/Data-Protection-Privacy-Notice-Summer-2022.docx.pdf>

<https://www.gatehouseschool.co.uk/wp-content/uploads/2023/12/Digital-Images-Policy-REVIEW-NOVEMBER-2024-.pdf>

<https://www.gatehouseschool.co.uk/wp-content/uploads/2023/12/E-safety-Policy-Review-Spring-2024.pdf>

<https://www.gatehouseschool.co.uk/wp-content/uploads/2023/04/Code-of-Conduct-for-Pupils-for-Online-Sessions-.pdf>

<https://www.gatehouseschool.co.uk/wp-content/uploads/2024/04/Remote-Learning-Protocol-for-Gatehouse-School-Staff-reviewed-spring-2024-.pdf>

<https://www.gatehouseschool.co.uk/wp-content/uploads/2024/03/Behaviour-Management-Policy-.pdf>

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

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

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

Roles and Responsibilities

Governors

Governors are responsible for the approval of the e-Safety Policy and for reviewing the effectiveness of the policy. The link Governor for Safeguarding also acts as e-safety governor and will meet and work together with the Headteacher, DSL and Technology Services Provider representative to review all related policies, practices and procedures.

Designated Safeguarding Lead

The Designated Safeguarding Lead:

- Takes day to day responsibility for e-safety issues and has a leading role in establishing and reviewing the school e-safety policies and procedures
- Has training to demonstrate she understands the unique risks associated with on-line safety
- Can recognise the additional risks that learners with SEND face online.
- Ensures that all staff are provided with on-line safety training at induction and regular intervals
- Ensures that all staff are aware of the procedures that need to be followed in the event of an e-safety incident taking place
- Provides training and advice for staff
- Liaises with the LADO
- Liaises with the ICT teacher
- Receives reports of e-safety incidents and creates a log of incidents to inform future e-safety developments, meets regularly with the Headteacher to discuss current issues, review incident logs and filtering/change control logs
- Reports regularly to the rest of the Leadership Team
- Meet and work together with the Headteacher, Governors and Technology Services Provider representative to review all related policies, practices and procedures.

Vizst Technology Services:

The IT Service provided by the Vizst Technology are responsible, in conjunction with the School's IT Technician, for ensuring:

- That the school's technical infrastructure is secure and is not open to misuse or malicious attack
- That the school meets required e-safety technical requirements
- That users access the network and, where possible, devices through a properly enforced password protection policy, in which passwords are regularly changed
- That filtering and monitoring is applied and updated termly and that its implementation is not the sole responsibility of any single person
- That they provide filtering and monitoring reports and complete actions following concerns raised and carry out checks to the system
- That filtering and monitoring is applicable to devices used off site

- That they keep up to date with e-safety technical information in order to effectively carry out their e-safety role and to inform and update others as relevant
- That monitoring software/systems are implemented and updated as agreed
- That they meet and work together with the Headteacher, DSL and Governors to review all related policies, practices and procedures.

Teaching and Support Staff

Teaching and Support Staff are responsible for ensuring that:

- They have an up to date awareness of e-safety matters and of the current school e-safety policy, procedures and practices
- They report any suspected misuse, concern or problem to the Headteacher or DSL for investigation
- All digital communications with pupils and parents should be on a professional level and only carried out using official school systems; all communication with pupils should be to their school email address
- E-safety issues are embedded in all aspects of the curriculum and other activities

Designated Person for Safeguarding

The Designated Person for Safeguarding should be trained in e-safety issues and be aware of the potential for serious safeguarding issues to arise from:

- Sharing of personal data
- Access to illegal/inappropriate materials
- Inappropriate online contact with adults/strangers
- Potential or actual incidents of grooming
- Cyber-bullying

Parents

Parents play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues through parents' evenings, newsletters, the School website and information about national/local e-safety campaigns/literature. Parents and carers will be encouraged to support the school in promoting good e-safety practice and to follow guidelines on the appropriate use of:

- Digital images taken at school events
- Access to parents' sections of the website

The Online Safety Policy and Pupil Behaviour Policy, the school's Acceptable Use Agreement for staff and pupils, and the school's Mobile Phone and Smart Technology Policy all clearly state the terms and conditions of use at Gatehouse.

There is an ongoing risk assessment regarding use of technology within the school.

When it comes to the safety and well-being of the child, the response to the risks and harms that children may experience in the online or digital environment should be no different than the offline, face to face world. For most children there is little distinction between the online and face to face interactions as the two environments often

intersect with one another in their daily lives. Staff should recognise that children's experience of abuse in the digital environment may be even more pronounced, where the identity of the abuser is unknown and the abuse can continue 24 hours a day, 7 days a week.

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

to the Anti-Phishing Working Group (<https://apwg.org/>).

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

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

1.34 Mobile phones and cameras

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

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

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

- all children must be appropriately dressed
- images that only show a single child with no surrounding context should be avoided - photographs of three or four children are more likely to include the learning context
- use photographs that represent the diversity of children participating
- do not use images that are likely to cause distress, upset or embarrassment
- do not use images of a child who is considered vulnerable, unless parents/guardians have given specific written permission

- photographs must not be taken in the cloakroom/toilet areas or in the nappy-changing area

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

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

1.35 Risk assessment

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

29: Domestic Abuse:

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

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

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

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

Schools can contact the Tower Hamlets Violence Against Women and Girls Team for support required on any of the VAWG strands including training needs. Please contact the Prevent Training Officer:
Amy-Kate.Garwood2@towerhamlets.gov.uk.

30: So-Called Honour-based abuse (HBA):

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed supposedly to protect or defend the honour of the family and/or community, including FGM (see below) and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.

Female Genital Mutilation (FGM).

In England, Wales and Northern Ireland, FGM is a criminal offence under the Female Genital Mutilation Act 2003.

Please refer to the HM Government Multi-Agency Statutory Guidance on FGM, Updated 30th July 2020

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

Forced marriage

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

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

Please refer to the Forced Marriage Unit's Statutory Guidance and Multi Agency Guidelines The Right to Choose Updated June 2022

Virginity Testing and Hymenoplasty

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

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

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

31: Radicalisation and Extremism:

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school's safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

Statutory guidance on the Prevent duty 2023 (Updated March 2024), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism. Paragraphs 141-207 pertain to Education. Reference should also be made to The Prevent duty: safeguarding learners vulnerable to radicalisation. Support for those working in education settings with safeguarding responsibilities (Department for Education, October 2022]

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

All staff are trained in Prevent awareness, which is updated annually. The [Statutory guidance on the Prevent duty](#), explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism. Paragraphs 57-76 pertain to schools.

There are four specific elements to Gatehouse School's approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment – working with the Local Authority, who provide contextual information about the area, the School assesses the risk of pupils being drawn into terrorism, including extremist ideologies
- Working in partnership – liaising closely with Tower Hamlets Safeguarding Children Partnership to ensure pupils requiring support are referred at a suitably early stage
- Staff training – enabling staff to identify pupils at risk of being drawn into terrorism and to challenge extremist ideas
- IT policies – to provide guidance to pupils as to how to stay safe online (see Acceptable Use Policy) and set out the filtering and monitoring mechanisms in place.
- **Pupils can discuss issues of religion, ethnicity and culture and how the school promotes fundamental British Values as part of SMCS (spiritual, moral, social and cultural education during PSHE, assemblies, RE lessons, House assemblies.**

In LBTH the Prevent Education Officer is Iona Karrman-Bailey:

iona.karrman-bailey@towerhamlets.gov.uk

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

32: Arrangements for dealing with child-on-child abuse and allegations

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

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

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

1.38 Pupils with Special Educational Needs or Disabilities are particularly vulnerable to child-on-child abuse

Child on Child abuse

1. CHILD-ON-CHILD ABUSE

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

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

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

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

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse such as biting, hitting, kicking or hair pulling
- sexually harmful behaviour and sexual abuse including inappropriate sexual language, touching, sexual assault or rape
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos
- teenage relationship abuse – where there is a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- upskirting – taking a picture under a person's clothing without their knowledge and/or permission with the intention of viewing their buttocks or genitals (with or without underwear) to obtain sexual gratification. It is a criminal offence.
- initiation/hazing - used to introduce newcomers into an organisation or group by subjecting them to a series of trials and challenges, which are potentially humiliating, embarrassing or abusive.
- prejudice and discrimination - behaviours which cause a person to feel powerless, worthless or excluded originating from prejudices around belonging, identity and equality, for example, prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

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

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

how allegations of child-on-child abuse will be recorded, investigated and dealt with

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

You must record the allegation and tell the DSL, but do not investigate it

The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment and minimising the risk of child-on-child abuse

procedures in place to minimise the risk of child-on-child abuse.

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between pupils, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously

- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - § Children can show signs or act in ways they hope adults will notice and react to
 - § A friend may make a report
 - § A member of staff may overhear a conversation
 - § A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming another pupil could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

How victims, perpetrators and other children affected by child-on-child abuse are supported at the school.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

33: Child on Child Sexual Violence and Sexual Harassment

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

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

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

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

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

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

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

1.42 All staff will be trained to manage a report of child-on-child sexual violence and sexual harassment. If an allegation of child-on-child abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria, the case will be referred to the local authority using the procedures set out in this policy. The School will take advice from children's social services on when and how to inform the pupil about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all pupils involved including those accused of abuse. Further details on how cases of child-on-child abuse will be managed is contained in Part 5 of KCSIE (September 2023).

1.43 A pupil against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the School's policies on behaviour and discipline will apply.

1.44 If it proves necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the pupil during the interview, in accordance with PACE Code C statutory guidance. If a pupil's parents are abroad, the pupil's education guardian will be asked to support the pupil and to accommodate him or her if they have been suspended.

1.45 Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other pupils at the School) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other pupils; and any relevant contextual factors. Children's social services will independently risk-assess the situation and any report produced by them will be used to inform and update the School's own risk assessment which, in any event, will be reviewed on a regular basis.

When reports of child-on-child sexual violence and sexual harassment are brought to the attention of the DSL, the DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

34: Youth produced sexual imagery:

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

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

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

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

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

Please refer to [Sharing Nudes and Semi-Nudes. Advice for Education Settings working with Children and Young People \(Updated March 2024\)](#)

Staff should avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically. The DSL should be informed immediately

35: BULLYING (INCLUDING CYBERBULLYING)

Bullying is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the school's Anti-Bullying Policy, Pupil Behaviour Policy, and Child-on-child abuse Policy. *in accordance with Keeping Children Safe in Education 2024 and Behaviour in Schools. Advice for Head teacher and School Staff (September 2022).*

36: Homelessness:

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL and deputies are aware of contact details and referral routes into the Local Housing Authority so that they can raise /progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour as well as the family being asked to leave a property.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. *The Homelessness Reduction Act 2017* places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

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

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

37: Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The DSL will ensure that the children concerned are supported and where appropriate make use of the guides provided by the HM Courts & Tribunals Service for children 5-11-year olds and 12-17 year olds. Making child arrangements via the family courts following parental separation can be stressful and entrench conflict in families. This can be stressful for children too. Where appropriate parents can be signposted to the Department of Justice's information toolkit for families on making child arrangements which sets out each party's responsibility including the importance of putting the needs of the children first in the process.

38: Children with family members in prison

An estimated 310,000 children every year have a parent in prison in England and Wales and 10,000 visits are made by children to our public prisons every week. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

The DSL will draw upon the resources and guidance offered through The National Information Centre on Children of Offenders (NICCO) to support the children involved and mitigate negative consequences for those children.

39. PRIVATE FOSTERING

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Staff should be vigilant about children who are in private fostering arrangements and report concerns to the DSL, who will notify the Local Authority through a MASH referral, as set out in the THSCP Multi-Agency Private Fostering Guidance (January 2022). The Local Authority will check the arrangement is suitable and safe for the child in accordance with the Private Fostering statutory guidance.

40: YOUNG CARERS

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

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

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

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

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

41. CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

All incidents of Child Abduction should be reported immediately to the Police and Children's Social Care.

Other community safety incidents in the vicinity of a school can raise concerns amongst staff, children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. All incidents that occur during the school day should be immediately reported to the DSL, and steps taken to ensure the safety and well-being of the children involved.

As the children get older and are granted more independence, such as walking home from school alone in Year 6, they are given safety-awareness lessons and practical advice on how to keep themselves safe outdoors. This is achieved through a number of trips, workshops, PSHE lessons and a visit from TFL to talk about journey safety. These lessons focus on confidence and abilities.

42. MODERN SLAVERY

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.

Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

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

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

43. TAKING SAFEGUARDING ACTION

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

- in an emergency take the action necessary to help the child (including calling 999)
- report your concern as soon as possible to the DSL, no later than the end of the day do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern
- seek support for yourself if you are distressed.

44. EARLY HELP

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

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

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

The Early Help strategy, Social Inclusion Panel

When an EHA has been completed and a Team Around the Family is in process, the school can refer to the borough's Social Inclusion Panel in support of a co-ordinated and targeted plan to bring about improvement in the child's outcomes. The DSL will contact the LBTH Early Help Hub for support and advice if required LBTH Early Help Hub: 0207 364 5006 (option 2) Alternatively, the DSL will complete an Early Help Enquiry form which can be accessed via <https://bit.ly/2AA2WNY>

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

The DSL will apply the LBTH Thresholds Guidance to decide what level of safeguarding response is required as part of the Early Help response. If in doubt about the level of need the DSL will contact the LBTH MAST for support and advice if required: 0207364 5006 (Option 3) 020 7364 3444/5601/5606/5358/7796

Social Inclusion Panel

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

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

MAST:

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

Child Protection Advice Line 020 7364 3444

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

If a child has been receiving Early Help support from the school and other agencies and there is no improvement in the child's outcomes, then the DSL must refer the child to Children's Social Care The School recognises the increased vulnerability of young people to whom any or all of the following apply:

- They are disabled or have special educational needs (whether or not they have a statutory Education, Health and Care Plan) as they are more prone to group isolation or bullying, including prejudice-based bullying.
- They do not have English as a first language.
- They are living away from home for the first time
- Are faced with challenging family circumstances.
- They are looked-after children.
- they are showing signs of being drawn into antisocial or criminal behaviour
- They are acting as a young carer.

- are at risk of being radicalised
- They are showing early signs of abuse, neglect or mental health problems.
- They may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

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

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

45: Reporting Concerns and Record Keeping

If a pupil discloses that they have been abused or neglected in some way, the member of staff should:

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

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

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

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

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

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

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

1.47 If a member of staff has concerns about a pupil's welfare, including any mental health concerns, they must inform the DSL as soon as possible, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section *Allegations against members of staff (including supply staff) and volunteers* below should be followed. Staff should not assume that somebody else will take action and share information that might be critical in keeping a pupil safe.

1.48 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

1.49 When a child is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made by the DSL to Children's Social Care. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge.

1.50 If a pupil is in **immediate danger** or is at **risk of harm**, is suffering or is likely to suffer from harm, a referral should be made to children's social services and/or the police **immediately**. Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible. Further guidance on when to call the police is provided by the [NPCC - when to call the police](#).

1.51 If a teacher discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the teacher **must** report this to the police. Unless the teacher has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed in accordance with the safeguarding procedures described in this policy. (For further details, see Annex A of KCSIE and '[Guidance for Schools](#)' information.)

1.52 The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

1.53 Parents can report to the DSL on the welfare of any pupil in the School, whether their own child or not. If preferred, parents may discuss concerns in private with the pupil's teacher or other member of staff, who will notify the DSL.

1.54 Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

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

2.1 When the DSL is notified of any concerns about a pupil's welfare, he or she will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social services. A matter involving a serious criminal offence will always be referred to social services and the police immediately.

2.2 Factors that the DSL should bear in mind when making their decision include:

- the best interests of the child

- the nature and seriousness of the complaint
- contextual factors
- the referral threshold set by Tower Hamlets Safeguarding Children Partnership
- the child's wishes or feelings
- the inter-agency procedures of Tower Hamlets Safeguarding Children Partnership
- where relevant, local information sharing protocols relating to Channel referrals.

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

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

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

46: Confidentiality and sharing information:

Staff should never assume a colleague or another professional will take safeguarding action through the sharing of information that might be critical in keeping children safe. Staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Serious Case Reviews have highlighted failures in safeguarding systems in which people did not share information at the earliest opportunity or did not share at all. If in any doubt about sharing information, staff should speak to the Designated Safeguarding Lead or a deputy.

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

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

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

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

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

Gatehouse will be mindful of situations where gaining consent to share information would place a child at increased risk of harm. Information may be shared without consent if the DSL under instruction from the Police or Social Services has reason to believe that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. When decisions are made to share or withhold information, all practitioners involved will record who has been given the information and why.

Information sharing decisions will be recorded, whether or not the decision to share has been taken. Child protection information will be stored securely separate from the pupil's school file. Child protection information is stored and handled in line with the school's Retention and Destruction Policy. Where safeguarding information is stored electronically and online, the school has cybersecurity measures in place, which meets the Department for Education's Cybersecurity Standards, to ensure the data is safe and not vulnerable to evolving cyber-crime.

Informing parents

2.5 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer, children's social services, the police and/or the Head before discussing details with parents.

2.6 For Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

2.7 When the School decides to refer a particular complaint of abuse to social services or the police, the parents/guardian and pupil will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.

2.8 For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

47: Making a referral to children's social services

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

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

Child Protection Advice Line: 020 7364 3444

The DSL will contact CPAL/MAST in the first instance to seek advice and guidance. When the DSL completes a MAST Request for Support form and sends it securely to the Multi-Agency Support Team, the referral form will be

accurate and sufficiently detailed to enable the MAST to make a decision on the level of statutory response required in accordance with the THSCP Levels of Need Guidance.

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

48: ESCALATION PROCEDURES

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

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

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

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

Other safeguarding arrangements

49: Safer Recruitment

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

50: School premises, security and visitors

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

51: Monitoring this Policy

- Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the School and a report to the governors. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the School's procedures.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings. In addition, the DSL will present a termly report to the governors, as part of the Head Teacher's Report.
- The governors will undertake an annual review of the policy and implementation of its procedures including good cooperation with local agencies and of the efficiency with which the related duties have been discharged. The governors will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.
- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

September 2024

Multi-Agency Support Team (MAST) 020 7364 3444 / 5601 / 5606 / 5358 / 7796 If there is a concern about the welfare of a child or young person and you would like to talk it through then you should contact the Tower Hamlets Children Services' Multi-Agency Support Team (MAST). The Duty Officer will be able to discuss the concern, assist in deciding whether a referral is appropriate and facilitate the reporting of a referral in accordance with Tower Hamlets Safeguarding Children Partnership (THSCP) Procedures and to offer advice. When there is a specific concern of a child protection nature whereby it is thought that a child has been harmed or at risk of being harmed then the MAST should then be contacted on 0207 364 3444 / 5601 / 5606 / 5358 / 7796 in the first instance to discuss the matter followed by the completion of the LBTH MAST Request for Support Form to MAST@towerhamlets.gov.uk. The MAST operates between 9.00am and 5.00pm except at weekends and on public holidays. If the concern arises outside of the hours operated by the MAST and it is believed the child may be at immediate risk the Children's Social Care Emergency Out of Hours Duty Team or the Police should be contacted without delay.

Important contact information:

The Multi Agency Support Team (MAST) Note – information should only be emailed following prior discussion with the Duty Officer.

MAST@towerhamlets.gov.uk.

Children's Social Care Emergency Out of Hours Duty Team (5.00pm onwards) 020 7364 4079

Appendix 1: Contact details

School

Position	Name	Phone	e-mail
Designated safeguarding lead (DSL)	Fiona Tighe	07957565416	fiona.tighe@gatehouseschool.co.uk
Deputy DSL (responsibility for EYFS)	Aileen Reidy	07941226306	ailleen.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
Nominated safeguarding governor	Joanna Scott	07971629549	joannascott2000@gmail.com

Local Authority children's social services numbers

Name	Phone	Out of hours phone	
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 Training, Consultation and Advice:

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

Allegations against staff

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

Extremism

Title	Name	Phone	e-mail
Local Authority Prevent Lead for Tower Hamlets	Jake Butterworth	020 7364 3009	Mash@towerhamlets.gov.uk
Prevent Education Officer	Iona Karrman-Bailey	Tel: 020 7364 4549	Tel: 020 7364 4549 Iona.Karrman-Bailey@towerhamletsgov.uk
DfE non-emergency advice			counter-extremism@education.gov.uk
Police	Non-emergency number	101	

Female genital mutilation (FGM)

Title	Name	Phone	e-mail
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LSCP Lead for FGM		020 7641 1610	
Project Azure		02071612888	
Metropolitan Police		999 112 from mobile	

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: Further information on signs of abuse

Physical abuse

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

Emotional abuse

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

Sexual abuse

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

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

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

Child sexual exploitation

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

Child criminal exploitation and county lines

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • See sections on physical and sexual abuse • Carrying weapons 	<ul style="list-style-type: none"> • Self-harming • Persistently 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

	<ul style="list-style-type: none">• Gang association or isolation from friendship groups or social networks
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Female genital mutilation

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

Forced marriage

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

Grooming

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

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

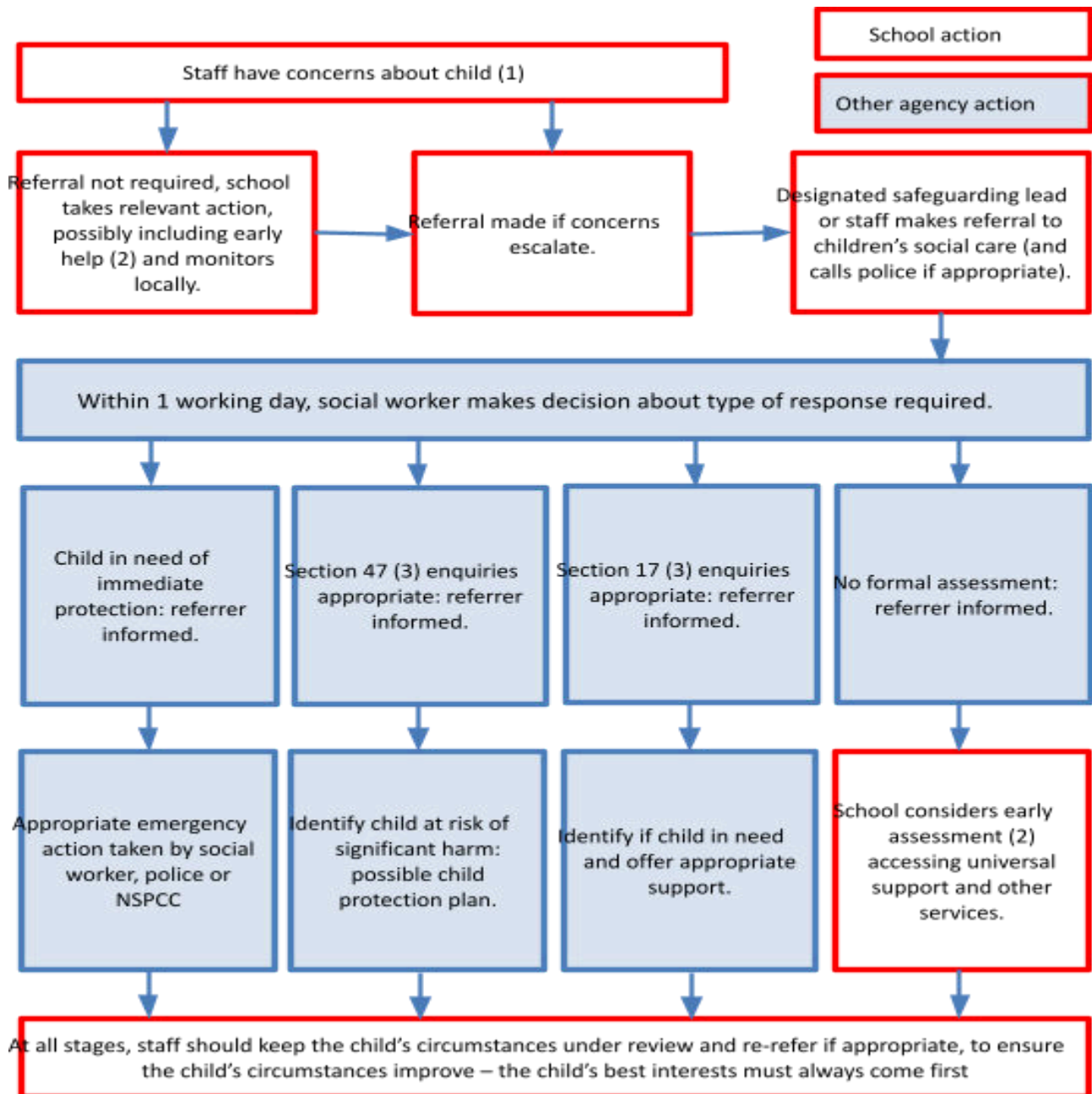
Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Out of character changes in dress, behaviour and friendship groups 	<ul style="list-style-type: none"> • Showing sympathy for extremist causes • Glorifying violence • Evidence of possessing illegal or extremist literature • A sudden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

Broad government guidance on the following is also available via the GOV.UK website (see Part one: Keeping children safe in education September 2024)

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

- preventing radicalisation
- relationship abuse
- sexting
- trafficking

Appendix 4: Actions where there are concerns about a child (KCSIE, September 2023)



Appendix 7: DSL/DDSL job description

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

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

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