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Seven Mills Primary
School



Child Protection Policy

July 2023

Headteacher's Signature:

Chair of Governor's Signature:

Date: July 2023

Review date: July 2024



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INTRODUCTION

School Vision

We provide our children with the best education on the Isle of Dogs through exciting, experiential learning, rooted in equality of opportunity, and demonstrate our moral purpose through care for our community and the wider world.

School Values

We are... Ambitious

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We are... Compassionate

We are... Empowered

List of School Safeguarding Policies

Child Protection Policy

[Intimate Care Policy](#)

[Positive Handling Policy](#)

[Behaviour Policy](#)

[Anti-Bullying Policy](#)

[Complaints Procedures](#)

[Code of Conduct](#)

[Allegations Against Staff](#)

[Online Safety Policy](#)

[Acceptable Use Policy](#)

The Child Protection Policy is available on the school website and in the policies folder on Google Drive.

All safeguarding policies will be reviewed by the Senior Leadership Team (SLT) and the Full Governing Body (FGB) annually or otherwise stated unless an incident, new legislation or guidance calls for the need for a review.

Safeguarding Statement

At Seven Mills we recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

Safeguarding our children is the responsibility of every member of staff at Seven Mills. We have a dedicated safeguarding team who work together to ensure the safety of all children at Seven Mills.

All procedures within the CP policy apply to all staff, volunteers and governors and that they have been written in accordance with Keeping Children Safe in Education 2020 and Tower Hamlets Safeguarding Children Partnership supplementary guidance (THSCP).

CORE SAFEGUARDING PRINCIPLES

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

These 6 core principles are embedded within the school's safeguarding arrangements; its safeguarding policies, procedures and systems; and underpin the whole school approach to safeguarding at Seven Mills Primary

PURPOSE OF POLICY

- To provide all staff with key information to enable them to identify safeguarding concerns and know what action to take in response.
- To ensure consistent good practice throughout the school.
- To demonstrate the school's commitment to safeguarding to the whole school community: pupils, parents and other partners.

SAFEGUARDING LEGISLATION AND GUIDANCE

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

- Section 175 of the Education Act 2002 (Local maintained schools only)
- Education and Training (Welfare of Children) Act 2021 (16-19 Academies and Independent Training Providers)
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguarding Children 2018 (Updated July 2022)
- [Keeping Children Safe in Education \(1 September 2023\)](#)
- What to do if you're worried a child is being abused 2015
- [Statutory Framework for the early years foundation stage \(1 September 2021\)](#)
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014)
- The Teacher Standards 2012

THSCP SUPPLEMENTARY SAFEGUARDING GUIDANCE

The following THSCP safeguarding guidance has informed the content of this policy:

- [London Child Protection Procedures revised 7th Edition \(London Safeguarding Children Board, 31st March 2023\)](#)
- Tower Hamlets SCP Multi-Agency Safeguarding Thresholds Guidance
- [Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Child Protection Procedures - September 2023](#)

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- 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 – September 2023

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: <http://www.childrenandfamiliestrust.co.uk/the-lscb/>

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

The school will engage with the borough's Designated Safeguarding Lead Forums, co-operate with the Rapid Review process and any Child Safeguarding Practice Reviews, participate in the THSCP multi-agency safeguarding training offer, and co-operate with the THSCP's and borough's Section 175/157 School Safeguarding Audit cycle.

KEY DEFINITIONS

Safeguarding and promoting the welfare of children is:

- protecting children from maltreatment
- 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.

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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.

ROLES AND RESPONSIBILITIES

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

In accordance with the statutory requirement the named member of the Governing Body who takes leadership responsibility for safeguarding at the school is Isabel Epstein and they are referred to as the Safeguarding Link Governor.

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

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

DSL - Nicole Philpotts (Assistant Headteacher)

nphilpotts@sevenmills.towerhamlets.sch.uk

Deputy DSL - Tom Foster (Headteacher)

tfoster@sevenmills.towerhamlets.sch.uk

Deputy DSL - Matthew Tranter (Deputy Headteacher)

mtranter@sevenmills.towerhamlets.sch.uk

Deputy DSL - Momothaj Begum (Family Support Worker)

mbegum@sevenmills.towerhamlets.sch.uk

Wider Safeguarding Team:

Isobel Epstein (Safeguarding Governor and Chair of Governors)

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cog@sevenmills.towerhamlets.sch.uk

All staff should recognise that as frontline workers they are in an important position to identify concerns early, provide help and support to children, promote children's welfare, and prevent concerns from escalating. All staff have a responsibility to provide a safe environment in which children can learn. All staff have a responsibility to report safeguarding concerns immediately to the DSL via CPOMs.

The role of the DSL includes:

- ensuring all staff read and understand the school's safeguarding policies and that procedures are followed by all staff
- advising and supporting staff as they carry out their safeguarding duty
- encouraging a whole school approach to safeguarding, which is when paramountcy of the welfare of the child underpins all systems, policies, procedures, and decision making
- promoting a culture of listening to the voice of the child and ensuring that there are formal and informal opportunities for that voice to be heard
- ensuring timely and accurate referrals are made to children's social care, the police, or other agencies
- participating in strategy discussions and inter-agency meetings
- liaising with the case manager and the Local Authority Designated Officer (LADO) where allegations are made against staff
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- transferring the child protection file to a child's new school and proactively contacting the new school in advance to help ensure a successful transition
- undergoing the required 2 day refresher training every 2 years as a minimum and receiving regular updates to maintain the knowledge and skills to carry out the role, including Prevent awareness training.

The Deputy DSLs are trained to the same level as the DSL and support the DSL with safeguarding matters.

All Staff are expected to keep safeguarding values at the centre of their conduct. The best interests of the child should determine their behaviour and action.

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework or the Early Help Assessment) and their role in it, including identifying emerging

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problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation
- The process to escalate concerns if they disagree with the DSL's decisions about the safety and welfare of a child
- The process to refer concerns directly to the MASH team or Duty Line in exceptional circumstances.

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. All staff understand the Sexual Offences Act 2003 makes it an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence.

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, the school must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected

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characteristics). [\(See Seven Mills Equality Policy\)](#) The school is committed to supporting and taking positive action towards children with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race- who may be at a disadvantage and be disproportionately vulnerable.

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

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. 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.

CHILDREN WHO MAY BE POTENTIALLY MORE AT RISK OF HARM

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

A Child who:

- is disabled or has certain health conditions and has specific additional needs;

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- special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- 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;
- 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.

CHILDREN IN NEED OF A SOCIAL WORKER

Children may need a social worker due to safeguarding or welfare needs. Children who have been allocated a social worker may have experienced abuse, 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 in facing barriers to attendance, learning, behaviour and mental health. When making decisions about safeguarding, analysing risks 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 support alongside that provided by statutory services.

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

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[co-operate with the 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.](#)

Seven Mills 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. School staff will be informed when necessary of children with a social worker and how this might affect them pastorally or academically.

CHILDREN REQUIRING MENTAL HEALTH SUPPORT

All staff have an important role in supporting the mental well-being of children and to identify behaviour that may suggest a child is experiencing mental health problems. All staff recognise that mental health may be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are aware of the trauma and mental health impact on a child who has had adverse childhood experiences including abuse, bereavement and separation of parents. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

If a teacher is concerned about the mental health of a child, this must be referred immediately to the SENCo who will decide on the correct course of action. If this is also a Safeguarding concern, the normal procedures for safeguarding will take place.

LOOKED AFTER CHILDREN AND CARE LEAVERS

Staff have the skills, knowledge and understanding to safeguard Looked After Children and Care Leavers. 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.

We have appointed a designated teacher, Matthew Tranter Deputy Headteacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

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.

SEND CHILDREN

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

- professionals and other adults making assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities or certain medical conditions being vulnerable to experiencing peer exclusion and isolation and being disproportionately impacted by behaviours such as bullying (including prejudice-based bullying), without outwardly showing any signs;
- children not understanding that what is happening to them is abuse; and
- communication barriers and difficulties in overcoming these barriers.
- staff are trained to understand and be aware of these additional barriers to ensure this group of children are appropriately safeguarded.

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, understand or avoid abuse. Looked After Disabled Children may be particularly susceptible to possible abuse because of their additional dependency on residential and hospital staff for day to day physical care needs.

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Further information on safeguarding SEND children is available in the non-statutory guidance Safeguarding Disabled Children (2009), but staff should speak with the DSL and SENDCO in the first instance.

All staff are regularly trained to understand and be aware of the additional barriers that exist when safeguarding SEND children. Staff support and safeguard SEND pupils, including those with physical health conditions, by:

- Working alongside parents and the SENCO to develop an understanding of children's needs, preferred modes of communication and how they can best be supported.
- Identifying barriers to children identifying and disclosing concerns, and how to overcome these
- Attending training to support specific conditions and needs.
- Working alongside the SENCO to ensure that the school's safeguarding curriculum, particularly e-safety and RSE, are delivered in a developmentally appropriate manner, tailored to specific children's needs.
- Identifying behaviours that may put children at risk, and arranging provision such as social skills interventions to support children's behaviours.
- Ensuring that toileting and administration of medications is carried out in line with our Medical Needs Policy and Intimate Care Policy
- Offering emotional and behavioural support through our ELSA (emotional literacy support assistant), Drawing and Talking and mentoring programmes.

CHILDREN ABSENT FROM EDUCATION & CHILDREN MISSING EDUCATION

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

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

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also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Seven Mills has a family support office who contacts all parents on the first day of absence to ascertain the reasons for the absence. Seven Mills also works closely with the Attendance Welfare Advisor and the Local Authority to support any families with long term or persistent absenteeism.

When a pupil does not return to school and the whereabouts of the child and their family are not known, the school will make ~~initial~~ reasonable enquiries and refer the child to the Attendance & Welfare Advisor to support with those enquiries to ascertain the child's whereabouts, and only after these steps have been taken refer to the Local Authority using a Missing Children referral form.

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

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

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 head teacher 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 must 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.

WHISTLEBLOWING

All staff members have a responsibility to raise concerns about poor or unsafe practice and potential failures in any aspect of the school's safeguarding arrangements and staff should feel confident that such concerns will be taken seriously by the senior leadership team.

Seven Mills has a school [whistleblowing policy](#) that protects staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties. The school whistleblowing policy has a key role to play in safeguarding children.

Whistleblowing is when a worker reports suspected wrongdoing at work. Wrong-doing covered by this 'public interest disclosure' includes:

- someone's health and safety is in danger;
- damage to the environment;
- a criminal offence;
- not obeying the law;
- covering up wrongdoing;
- misusing public funds; (and in schools)
- actions that negatively affect the welfare of children

Where staff have concerns they should aim to report it internally first before using an external 'prescribed person or body'. Making a report to an external person may only be undertaken where the staff member thinks the school will cover it up, would treat them unfairly if they complained or have raised the matter before, but the concern hasn't been dealt with.

At Seven Mills, concerns should be raised with the headteacher or if the complaint is about the headteacher, with the Chair of Governors.

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

ALLEGATIONS AGAINST STAFF & CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

Allegations of harm may indicate that a person who works with children might pose a risk of harm to children if they continue in that role. When an allegation is made against a member of staff including supply staff and volunteers, the school's Managing Allegations Procedures should be followed, and all action taken needs to

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be in line with KCSIE 2021 Part 4 and THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – September 2021.

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

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

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

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

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

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

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

LBTH Local Authority Designated Officer (LADO):
Melanie Benzie

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

Telephone:
0207364 0677

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

Concerns about staff that do not initially seem to fulfil the allegation criteria set out above are known as Concerns that do not meet the Harm Threshold, sometimes called low-level concerns, not because they are insignificant but because they do not initially seem to meet the harm threshold. Staff should report and self-report such concerns in accordance with the school's procedures which are found in the school's Staff Code of Conduct. Contact will be made with the LADO for advice and guidance when appropriate as part of the Headteacher's or Chair of Governor's response to the report.

Seven Mills Code of Conduct

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.

STAFF SAFEGUARDING TRAINING INCLUDING TRAINING FOR GOVERNORS

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

At the start of every year, all staff will receive an update of the new Safeguarding policy and changes to KCSIE part 1. Every two years, all staff will receive full safeguarding training from the THSCP team.

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse

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or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

SAFER RECRUITMENT

The school's safer recruitment procedures comply with Keeping Children Safe in Education 2020 part 3 and the local safeguarding partner arrangements by carrying out the required checks and verifying the applicant's identity, qualifications and work history. At least one member of each recruitment panel will have attended safer recruitment training.

Seven Mills will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

The school requests and ensure receipt of written confirmation from supply agencies or third-party organisations that relevant checks have been carried out and the supply or third-party staff are suitable to work with children. Seven Mills also seeks a full DBS check for all trainee teachers, volunteers and contractors.

The school maintains a Single Central Record of recruitment checks undertaken, which is regularly reviewed for compliance.

VISITORS

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

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Visitors are expected to sign in via the school iPad and wear a visitor's badge. Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

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](#).

EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

All off-site activities and residential visits are subject to risk assessments which are overseen and monitored by the Educational Visits Coordinator. The school's child protection policy and procedures apply for all visits.

As with visitors, any organisation providing service at Seven Mills will be subject to enhanced DBS check and must provide this information before they are able to access the site. All organisations used must have the correct procedures in place for safer recruitment.

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

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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.

STAFF/PUPIL ONLINE RELATIONSHIPS

All Seven Mills staff will not contact or attempt to contact any pupil or to access their contact details (including their usernames/handles on different platforms) in any way other than school-approved and school-monitored ways, which are detailed in the school's Online Safety Policy. All staff will report any breach of this by others or attempts by pupils to do the same to the headteacher.

MOBILE USE AND CAMERA USE

Mobile devices brought into school are entirely at the staff member, students & parents or visitors own risk. The School accepts no responsibility for the loss, theft or damage of any phone or hand held device brought into school. Personal mobile devices will not be used during lessons or formal school time unless as part of an approved and directed curriculum-based activity with consent from Headteacher / SLT. Staff members may use their phones during school break times.

The recording, taking and sharing of images, video and audio on any personal mobile device is to be avoided, except where it has been explicitly agreed by the Headteacher. Such authorised use is to be recorded. All mobile device use is to be open to monitoring scrutiny and the Headteacher is able to withdraw or restrict authorisation for use at any time, if it is deemed necessary.

IDENTIFYING ABUSE

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

The school is aware that children can be at risk of abuse, harm and exploitation beyond the family home. Extra familial harms include sexual exploitation, criminal exploitation and serious youth violence abuse that occurs on digital and online platforms. All staff, especially the DSL and Deputy DSLs will consider whether children are at risk of harm and exploitation in environments outside the family environment.

INDICATORS OF ABUSE

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

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

Emotional - the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Neglect - the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate

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supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.

The school is aware of the borough's [LBTH Neglect Guidance](#) and understands its important role in identifying children who may be suffering from Neglect.

VOICE OF THE CHILD

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

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

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

Staff need to be aware of and promote the systems in place at the school which enable children to share their concerns and report abuse confidently, because they know that their concerns will be taken seriously by staff and action will be taken to safeguard and protect them.

When working with children or young people it is essential to gain a clear picture of their wishes, thoughts and feelings. It is good practice to ask the child or young person which practitioner they would like to gather this information from them.

- the right of a child or young person to be heard is included in the [UN Convention of Rights](#)
- the [Children's Act 2004](#) emphasises the importance of speaking to the child or young person as part of any assessment
- the importance of speaking to a child or young person and gathering their views has been consistently highlighted in lessons learned from serious case reviews.

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At Seven Mills we have the following procedures in place to ensure that the voice of the child is heard:

- We take everything a child says seriously and follow up with a DSL immediately.
- We have designated adults across the school who children know they can talk to.
- Regular safeguarding related assemblies ensure children know what to do if they are concerned about anything.
- Our PSHE curriculum and circle times promote a culture where it is ok to talk about our concerns.

SAFEGUARDING ISSUES

CHILD SEXUAL EXPLOITATION

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

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

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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 reports all concerns immediately to the DSL:

Some of the following can be indicators of CSE:

- 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; and
- children who suffer from sexually transmitted infections or become pregnant.
- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

At Seven Mills our PSHE and RSE curriculum is Jigsaw which has reference to and learning about the risks of CSE. It can be challenging for a child to recognise the coercive nature of a relationship and the difficulty in the child understanding themselves as a victim.

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

CHILD CRIMINAL EXPLOITATION

CCE 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.

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CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

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

Some of the following can be indicators of CCE:

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

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Primary schools should be alert to the increased vulnerability of children under 10 years old being exploited because they are under the criminal age of responsibility.

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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](#).

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.

ONLINE HARMS

Children should have the right to explore the digital environment but also the right to be safe when on it. However, 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. Technology often provides the platform that facilitates harm.

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:

- 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.

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

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

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

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

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

Seven Mills uses London Grid for Learning for all its filtering and has a dedicated ICT technician who is in charge of all filtering. Seven Mills has a separate Online Safety Policy and Acceptable Internet Use agreements for all staff and students which reference Prevent duty, have a risk assessment and keep children safe online.

For remote learning we have a separate Remote Learning Policy and Remote Learning Wellbeing Policy .

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

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

As referenced at the start of this policy, we have an online safety policy, and acceptable use policies.

All 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, physical environments, as the two 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.

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

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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.

HONOUR-BASED ABUSE

All forms of so-called Honour Based Abuse are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of Honoured Based Abuse, or already having suffered Honour Based Abuse.

If staff have a concern regarding a child who might be at risk of Honour Based Abuse or who has suffered from Honour Based Abuse, they should speak to the Designated Safeguarding Lead, who will follow local safeguarding procedures.

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

[Cross-reference 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

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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.

Staff need to understand that 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.

In England and Wales, the practice of Forced Marriage is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

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.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out

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- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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The above indicators and risk factors are not intended to be exhaustive.

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 fmufcdo.gov.uk.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmufco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

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

In England and Wales, the practice of Forced Marriage is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

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).

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 should be a part of a schools' or colleges' 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).

Schools have a duty to prevent children from being drawn into terrorism as part of the [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

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All staff receive online Prevent training. The Seven Mills curriculum is designed to enable pupils to 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 in PSHE and RE lessons as well as being entwined in our curriculum.

In LBTH the Prevent Education Officer is Jasmin.Phillips@towerhamlets.gov.uk who can provide support with Prevent risk assessments, check lists and awareness training among staff and pupils.

In LBTH all Prevent referrals should be made through the Multi Agency Safeguarding Hub.

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'. 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 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

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

Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. All allegations of child on child abuse must be reported to the DSL who will investigate it fully.

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.

Seven Mills' Children's Wellbeing Policy, Online Safety Policy and Anti-Bullying Policy detail how the school supports children who are victims of child on child abuse.

CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

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

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an older child because of an imbalance of power caused by factors such as height difference or cognitive ability.

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

In response to reports including disclosures school will reassure all victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. As part of school's wider safeguarding culture, staff should maintain an **'it could happen here'** approach in regard to child-on-child sexual violence and sexual harassment and understand that children in the school and the local community may be experiencing such forms of child-on-child abuse, including that facilitated by technology, regardless of the number of reports the DSL receives. As part of the reassurance to children, it will be made clear to children that the law is in place to protect them from abuse rather than to criminalise them.

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

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

Sexual violence offences are defined under the Sexual Offences Act 2003

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

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else,

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the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

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

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

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

All Staff need to be aware of the following:

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

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

Sexual Harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual Harassment may include the following:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

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- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence such as:
 - consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.
 - sharing of unwanted explicit content;
 - upskirting
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on
 - social media
 - sexual exploitation, co-ercion and threats

On a case-by-case basis the school will liaise with Children's Services and the Police as well as specialist services as part of the immediate response to child-on-child sexual harassment and the ongoing support for all the children involved.

Harmful Sexual Behaviours

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. School recognises that Harmful Sexual Behaviours can, in some cases, progress on a continuum. It is therefore important for all staff to address inappropriate behaviours to help prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma.

School takes seriously its duty to respond appropriately to all reports and concerns about children's sexual behaviours both online and offline, in and outside of the school, including reports of sexual violence and/or sexual harassment. The DSL has completed relevant training in responding to and managing harmful sexual behaviours and will draw upon appropriate resources such as the AIM Checklists and Assessment Tools. The DSL will liaise where appropriate with Children's Services, the Police and other specialist services.

As with all disclosure, we will record on CPOMS, produce a risk assessment to minimise contact between children and follow our policies for supporting victims and perpetrators.

Youth Produced Sexual Imagery

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

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

Incidents may also occur where:

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

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

When handling disclosures of Youth Produced Sexual Imagery, staff must be aware that it is illegal for staff to view or share such imagery. Staff should immediately report the disclosure to the Designated Safeguarding Lead.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

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- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial child on child sexual abuse review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)
- If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care

Informing parents

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The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through [insert details of your existing arrangements, e.g. a safer schools officer, a police community support officer, local neighbourhood police, dialling 101]

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

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 and procedure. , **in accordance with Keeping Children Safe in Education 2023 and Behaviour in Schools. Advice for Head teacher and School Staff (September 2022).**

[Anti-bullying policy and procedure](#)

HOMELESSNESS

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

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

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so 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. Whilst

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referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

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

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. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

CHILDREN WITH FAMILY MEMBERS IN PRISON

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

PRIVATE FOSTERING

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

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Each party involved in the private fostering arrangement has a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Once the notification has been made to the authority, Children's Services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carers household. Children's services will then undertake a range of suitability checks including DBS checks on everyone in the household over the age of 16.

Other professionals, for example GPs surgeries and schools, also have a responsibility to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. (see '[Replacement Children Act 1989 Guidance on Private Fostering 2005](#)' paragraph 2.6)

Note that although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear who has parental responsibility.

YOUNG CARERS

A child is a young carer if they are under 18 and help to look after a relative with a disability, illness, mental health condition, or drug or alcohol problem. A young carer will probably look after one of your parents or care for a brother or sister. They may do extra jobs in and around the home, such as cooking, cleaning or helping someone get dressed and move around. They may also give a lot of physical help to a brother or sister who's disabled or ill. Along with doing things to help their brother or sister, they may be giving them and their parents emotional support, too.

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

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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.

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 them to the National Referral Mechanism is available in the Modern Slavery Statutory Guidance.

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

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- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern on CPOMS or on a paper version that is uploaded by the child's class teacher to CPOMS
- seek support for yourself if you are distressed.

EARLY HELP

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

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

All staff recognise that all children may benefit from Early Help but some children may benefit from Early Help more than others, including a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- 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.

At Seven Mills there is a dedicated safeguarding team that looks at the Early Help response. This will include school's internal pastoral support system, use of Early Help Assessment, EHA Reviews and Team Around the Child/Family meetings when there is a multi-agency approach, and referral to Children's Social Care if the threshold has been met.

The DSL will contact the LBTH Early Help Hub for support and advice if required:

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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>

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 LBTH Thresholds Guidance to decide on 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 Safeguarding Hub for a discussion.

MASH:
020 7364 5006 (Option 3) 020 7364 5601/5606

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 will refer to Children's Social Care.

When there is multi agency support in place for a child in the form of an Early Help Assessment and Team Around the Family meetings, the DSL will consider whether to refer to the borough's Social Inclusion Panel to aid with coordination of support, when requiring support and advice, and to help prevent escalation to Level 3 Needs: This.Child@towerhamlets.gov.uk

HANDLING DISCLOSURES

When a child discloses that they have been or are being abused including exploitation and neglect, they may feel ashamed, especially if the abuse is sexual, and feel frightened lest their abuser finds out they have made a disclosure. The child may have been threatened, they may have lost all trust in adults; or may believe that they are to

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blame for the abuse. Sometimes the child may not understand that what is happening is abusive.

All staff should reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. During their conversations with the pupils, staff will:

- allow the child to speak freely
- remain calm
- allow silences
- do not ask leading questions
- tell the pupil what will happen next
- inform the DSL as soon as possible
- seek support if they feel distressed.

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

CONFIDENTIALITY AND SHARING INFORMATION

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They 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 will 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 DSL 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.

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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.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

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.*

REFERRING TO CHILDREN'S SOCIAL CARE

The DSL will make a referral to children's social care applying the LBTH Threshold 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 Safeguarding Hub:
020 7364 5006 (Option 3) 020 7364 5601/5606

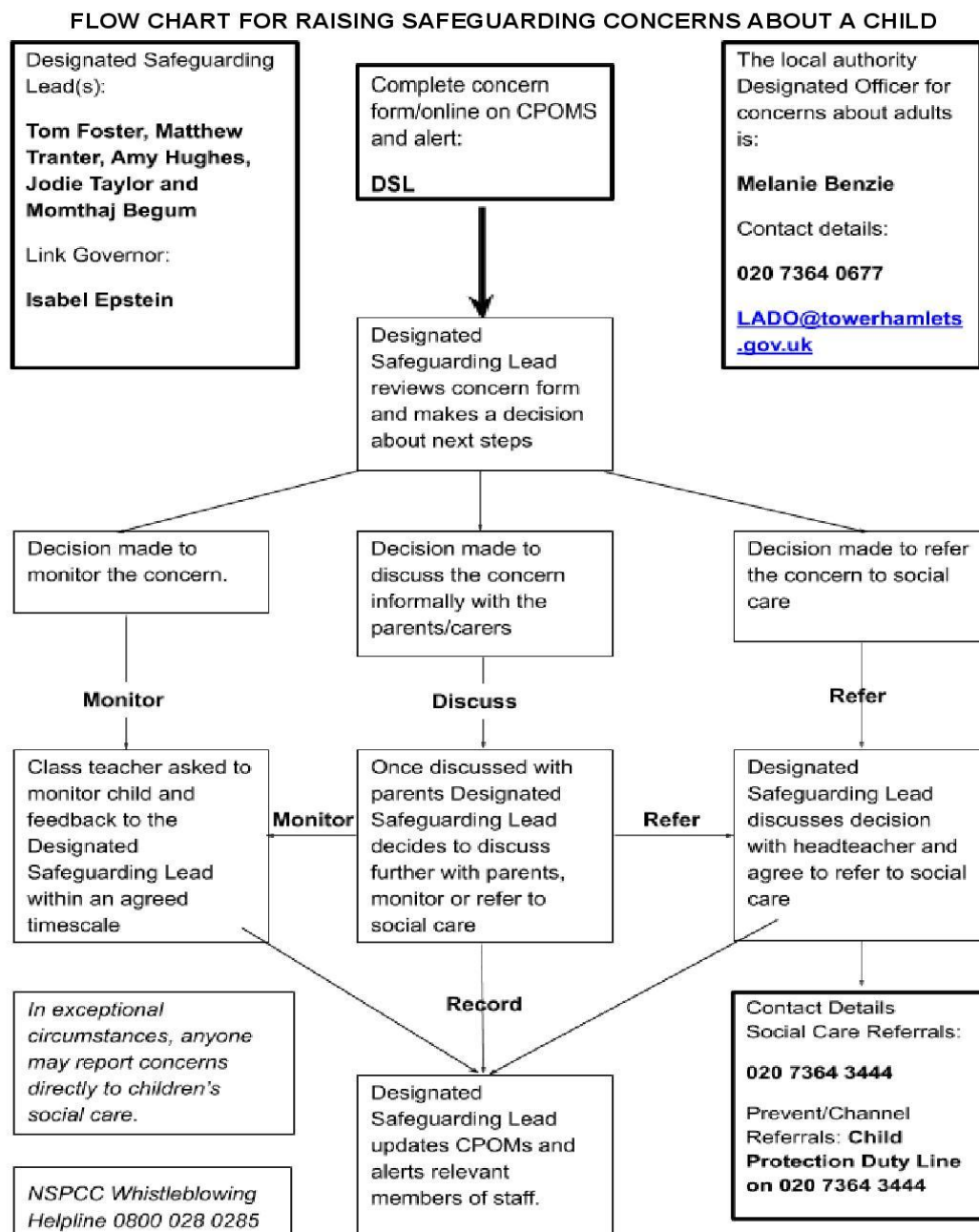
Child Protection Advice Line:
020 7364 3444

When the DSL completes a MASH referral form and sends it securely to the Multi-Agency Safeguarding Hub, the referral form will be accurate and sufficiently detailed to enable the MASH Assessment and Intervention Team to make a decision on the level of statutory response *required in accordance with the LBTH Thresholds Guidance.*

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

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See poster overleaf for details of the Seven Mills referral process.



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 Tower Hamlets Threshold Guidance Appendix D the DSL will first make contact with the team manager followed by the service manager followed by the divisional director. At every level of escalation there should be discussion and concerted effort to resolve any professional difference. It is important that the DSL at each point of escalation puts the concerns in writing.

Appendix 1: MASH Poster

Multi-Agency Safeguarding Hub (MASH)

020 7364 3444 / 5601 / 5606

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 and Culture Directorate's Multi-Agency Safeguarding Hub (MASH).

The Duty Officer will be able to discuss the concern, assist in deciding whether a formal child protection referral is appropriate and facilitate the reporting of a formal child protection 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 LBTH Inter-Agency Referral Form should be completed in the first instance. The MASH should then be contacted on 0207 364 3444 / 5601 / 5606 to discuss the matter and the completed Inter-Agency Referral Form then emailed/faxed through.

The MASH 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 MASH 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	
Multi-Agency Safeguarding Hub (MASH) email Note – information should only be emailed following prior discussion with the Duty Officer.	MASH@towerhamlets.gov.uk
Children's Social Care Emergency Out of Hours Duty Team (5.00pm onwards)	020 7364 5006 – choose Option 3

All updates to the document are in green

Child Abuse Investigation Team (CAIT)	020- 8217 6484 (or use 999 if not available)
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Multi-Agency Safeguarding Hub (MASH)

0207 364 3444
/ 5601 / 5606

Direct line: 9.00 am - 5.00 pm weekdays (not including public holidays)

Designated Safeguarding Lead

Date

Appendix 2: MASH Interagency Referral Form

This form is to be used by all agencies referring child/children to London Borough of Tower Hamlets CSC for assessment as a child in need, including in need of protection.

All urgent referrals should be initiated by phone/fax and with completion of as much of this form as possible or an updated CAF or a Signs of Safety Mapping tool. If information is incomplete, a MASH worker will work through the form to ensure the information is accurate and good quality. If you are a service provider in Tower Hamlets, as part of the Family Wellbeing Model, you may be asked to provide a CAF as well as this form. You should get feedback within 24 hours on this referral and we will proactively work with you and other services to ensure a service is provided to the child, even if it does not meet the thresholds for a statutory response as outlined in the Family Wellbeing Model.

SECTION A: CHILD/YOUNG PERSON									
Family Name						Forename/s			
DOB/EDD		M		F		*Ethnicity code		Religion	
Child's first language						Is an interpreter or signer required?			
Address									
Postcode						Tel.			
Current address if different from above									
Postcode						Tel.:			

All updates to the document are in green

***ONS Ethnicity Codes:** White British 1a; White Irish 1b; White other 1c; White & Black Caribbean 2a; White & Black African 2b; White & Asian 2c; Other Mixed 2d; Indian 3a; Pakistani 3b; Bangladeshi 3c; Other Asian 3d; Caribbean 4a; African 4b; Other Black 4c; Chinese 5a; Other ethnic group 5b

SECTION B: CHILD/YOUNG PERSON'S PRINCIPAL CARERS				
FULLNAME	DOB If known	Relationship to child	Ethnicity code	Parental responsibility

First language of carers: Is an interpreter or signer required: Y / N

SECTION C: OTHER HOUSEHOLD MEMBERS				
FULL NAME	DOB If known	Relationship to child/ young person	Ethnicity code	Tick if also referred

All updates to the document are in **green**

SECTION D: OTHER SIGNIFICANT PEOPLE IN THE CHILD/YOUNG PERSON'S LIFE, INCLUDING OTHER FAMILY MEMBERS			
FULL NAME	Relationship to child/young person	Address	Tel No

Referrals will be shared with the family and should not be made without their knowledge/agreement unless this would jeopardise the child/young person's safety		
	Y / N	If no, state reason
The child/young person knows about the referral		
The parent/carer knows about the referral		
The parent/carer has given consent to the referral.		

SECTION F: INFORMATION ON STATUTORY STATUS		
	Y / N	Please give details of name of child/young person, dates, category (if known)
Any child in family is/has been on the disability register?		

All updates to the document are in **green**

Any child in family is/has been on the child protection register (CPR)?		
Any child or other family member has been looked after by a local authority?		

SECTION G: KEY AGENCIES INVOLVED					
Insert name of professional if involved		Tel	Insert Name of professional if involved		Tel
H.V.			G.P.		
Nursery			EWO		
School			Police		
YOT			Dentist		
Community mental health			Community Paediatrician		
School Nurse			Midwife		
Hospital Consultant			Other		

SECTION H: INFORMATION SUPPORTING THIS REFERRAL
<p>The purpose of this section is to assist the inter-agency assessment. Where you have no information about a particular area, please write N/K (not known). Please record strengths as well as areas of need or risk so that resources can be directed appropriately.</p>

All updates to the document are in green

REASON FOR REFERRAL/REQUEST FOR SERVICES
<i>What are your concerns? (If an allegation of possible physical abuse, please give specific details of any injury including dates and explanations given)</i>

Scale how safe you think the child is: <i>With 0 being I am certain the abuse will happen again if something is n't done immediately and 10 being the case needs action but I don't think the child is in immediate danger, what rating would you give?</i> Comments on Score: Please tell us how you reached this score.
<i>What existing safety is there for the child(ren) – are there safe people around the child?</i>
<i>What are you most worried will happen to the child(ren) if the situation doesn't change?</i>

All updates to the document are in green

<i>What convinced you to take action now and contact us?</i>
<i>Have you done anything to address this problem (apart from making this referral)? For example has your agency used a CAF or a TAC to focus professional efforts on addressing the concerns? Has the Social Inclusion Panel been consulted for support?</i>
<i>What do you see as the cause of the problem?</i>
<i>What do you expect to happen as a result of this notification?</i>

SECTION I: DETAILS OF REFERRER AND SOCIAL WORKER TAKING REFERRAL	
Name of worker completing this referral (please print)	
Agency	
Address	
Ward/Consultant	
Telephone number	

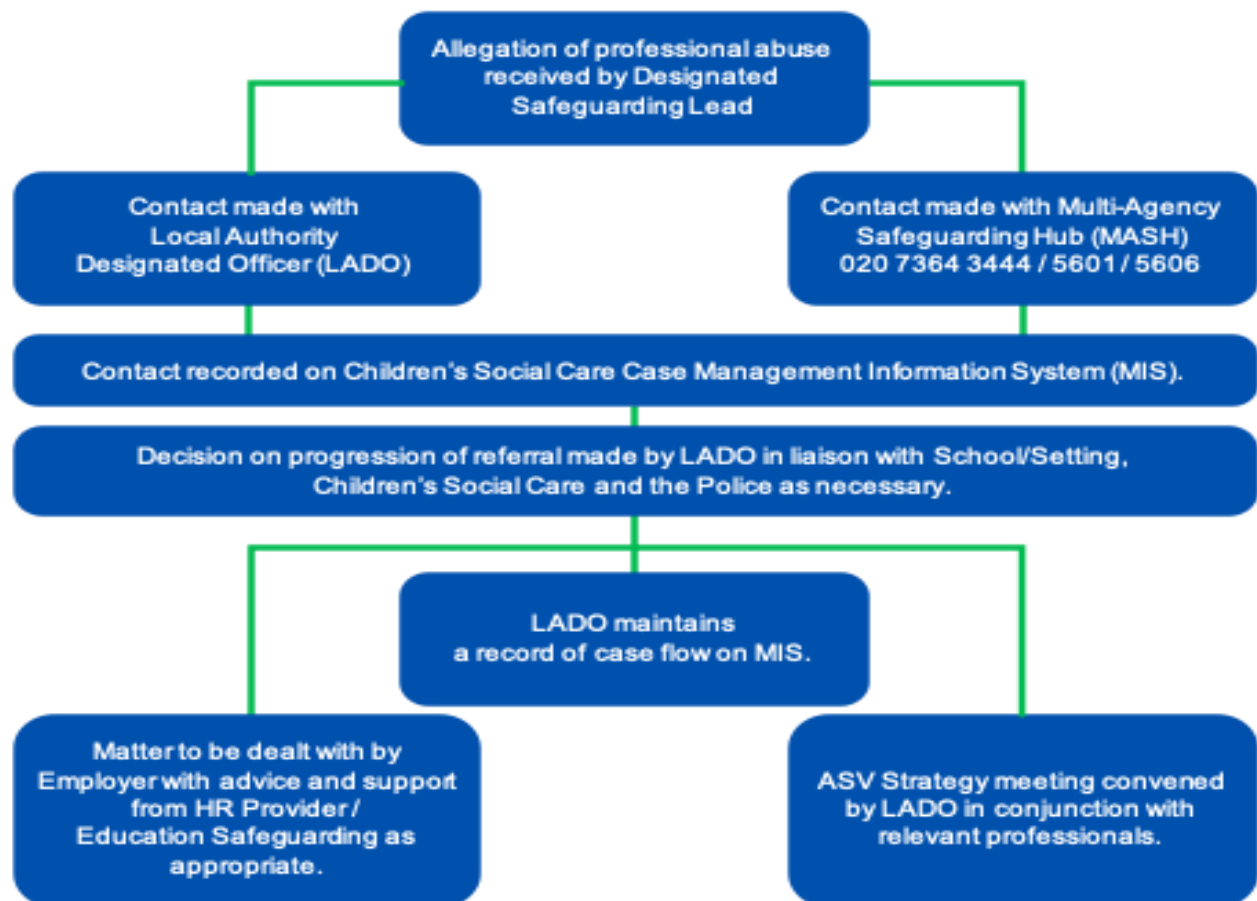
All updates to the document are in green

Signature		Date	
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Name of social worker taking referral			
Team		Date	
Social work context scale (for social worker to complete): <i>On a scale of 0 to 10 with 0 being this is the worst case that the agency has ever worked with and 10 indicates that this is a case the agency would take no further action with, where would you rate yourself?</i>			

Appendix 3: THSCP Managing Allegations Flowchart

OVERVIEW OF PROCEDURE FOR MANAGING ALLEGATIONS AGAINST STAFF AND VOLUNTEERS WORKING WITH CHILDREN IN SCHOOLS AND EDUCATION SETTINGS



Agencies/Persons invited to a multi-agency ASV meeting if appropriate can include:	
Alleged Perpetrator: Tower Hamlets employees	Alleged Perpetrator: Others
<ul style="list-style-type: none"> LADO Education Safeguarding Police HR Provider Service Manager/Employer School Chair of Governors / Setting Manager Named Senior Officer (Christine McInnes) 	<ul style="list-style-type: none"> LADO Education Safeguarding Police Muslim Children's Safeguarded Co-ordinator Service Manager/Employer Chair of Governors/ Management Committee HR Provider