OLD PALACE & CHILDREN'S HOUSE FEDERATION

CHILD PROTECTION POLICY

Introduction

Safeguarding and promoting the welfare of children is everyone's responsibility.
Everyone who comes into contact with children and their families/carers has a role to play in safeguarding and should consider at all times, what is in the best interests of the child.

The Federation's Governing Body recognises and is committed to its responsibility to safeguard, being responsible for ensuring the two schools understanding of their safeguarding responsibilities and promote the welfare and wellbeing of children within the legal framework of the Children Acts 1989 and 2004. For the purpose of this policy, safeguarding and promoting the welfare of children is defined as:

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

In accordance with Working Together to Safeguard Children 2026, our schools are a protective factor for all children especially the most vulnerable and have a pivotal role to play in local multi-agency safeguarding arrangements. The federation's contribution, insight and co-operation are vital to the successful delivery of these arrangements. The federation has been named as a 'relevant agency' and as such is under a statutory duty to cooperate with the THSCP multi-agency arrangements. This includes responding to safeguarding audits of quality and compliance, as requested by the local authority and/or local safeguarding partners.
In recognition of the federation's pivotal role in the local safeguarding system, the implementation of this Child Protection policy and other related policies to safeguard and promote the welfare of pupils, will support the federation's continued central contribution in driving improvements in outcomes for children in the borough, an overall objective set out in council strategy including:

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

We are aware that many children and young people are the victims of different kinds of abuse and that they can be subjected to social factors that have an adverse impact upon their lives. We adopt an attitude of it could happen here and therefore all staff are required to remain vigilant at all times.

Furthermore, we recognize that no single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a vital role to play in identifying concerns, sharing information and taking prompt action. The federation is therefore committed to multi-agency working.

Aims

This policy is for the use of all staff, governors, volunteers and visitors and is also available to parents on the federation website. The purpose of the policy is to provide all staff with key information to enable them to identify safeguarding concerns, know what action to take in response and understand their safeguarding responsibilities. Also:

- To ensure consistent good practice throughout the federation
- To demonstrate the federation's commitment to safeguarding to the whole federation community: pupils, parents and other partners
- To ensure children and young people are listened to, valued and respected and pupils are provided with a safe, stable environment in which they can learn
- Staff are aware of the need to be alert to the signs of abuse and know what to do with their concerns
- All staff are given appropriate support and regular training (including induction for all new members of staff and volunteers)
- Staff are able to carry out their roles and responsibilities in the context of safe working practices.

Responsibilities

To fulfil its safeguarding responsibilities, all procedures are written in accordance with the KCSIE 2026 and reflect local safeguarding arrangements. We also follow the procedures set out by our Safeguarding Partners (local authority, chief officers of police, and clinical commissioning groups) to:

- Ensure we have a named Designated Safeguarding Lead responsible for safeguarding and child protection, and also a Deputy Designated Safeguarding Lead, both of whom receive appropriate training every 2 years, as well as regular updates at the DSL forums.
- Participating in THSCP/LA's Section 175/157 Federation Safeguarding Audit Cycles.
- Ensure we have a nominated governor responsible for safeguarding.
- Ensure all staff, volunteers and governors know the name of the Designated Safeguarding Lead and their role, as well as their personal responsibilities regarding being alert to the signs of abuse, including the impact on Mental Health and referring any concerns.
- Ensure that safer recruitment practices are followed, including pre and post-employment checks and the use of the Teacher Services' system to check for prohibition orders. The federation's safer recruitment procedures comply with Keeping Children Safe in Education 2026 part 3 and the local safeguarding partner arrangements by carrying out the required checks and verifying the applicant's identify, qualifications and work history. At least one member of each recruitment panel will have attended safer recruitment training.
- Maintain a Single Central Record, including details of recruitment checks undertaken, which is regularly reviewed for compliance.
- Ensure that the relevant DBS checks are completed for all members of staff, governors and volunteers. A person volunteering in a role involving teaching or supervising children **more than**

3 days in a month or overnight is now in "regulated activity" and **must** have an enhanced DBS with a barred list check

- Request and ensure receipt of written confirmation from supply agencies and contract services that relevant checks have been carried out and that agency/ contract staff are suitable to work with children.
- Carry out relevant checks on trainee teachers and volunteers.
- Ensure the federation visitor's policy is implemented and visitors to the federation are appropriately supervised following completion of a risk assessment.
- Make all staff, governors, volunteers and visitors aware of the use of mobiles and cameras in reference to the Online Safety and Acceptable Use Policy.
- Ensure all staff maintain a professional relationship online with pupils, in line with the Staff Code of Conduct.
- Ensure all staff and Governors receive safeguarding and child protection training (including Online) during their induction and continue to receive regular updates, including an annual refresher.
- Ensure that the federation contributes to multi-agency working, including providing a co-ordinated offer of early help, when required, and contributing to multi-agency plans to support children subject to child protection plans
- When a Social Worker, Police Officer or another professional visits the federation to meet with a child as part of statutory investigations or other work, the ultimate safeguarding responsibility remains with the federation. The federation 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.
- Keep appropriate written records of any concerns that have been raised, the discussions regarding them, the decisions made and the reasons for these.
- Ensure all records are kept securely and that their storage and transfer complies with GDPR regulations.
- Ensure children are safeguarded from potentially harmful and inappropriate online material through the use of appropriate filters, monitoring systems, using an effective approach to the teaching of online safety (protecting and educating the federation) and following the guidance in the Online Safety Policy.
- Ensure the federation follows the advice provided by DfE on safeguarding and remote education (DfE, 2021b), should children need to learn remotely online.
- Ensure that the federation provides a broad and balanced curriculum, which teaches the children about safeguarding, for example through PSHE and RSE lessons and focus weeks.
- Carry out risk assessments for extended and off-site activities, ensuring the Child Protection Policy and procedures apply.
- Transfer CP files (securely) to a child's new education setting and proactively contact them in advance to help ensure a smooth transition.

In addition to this policy, all members of staff and Governors are required to read the DfE guidance: Keeping Children Safe in Education (September 2026) Part 1 and complete Educare training at the beginning of each academic year (or during induction should they join the federation later in the year), including Online Safety training, including an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring systems in place at the federation. Those who do not work directly with children also need to read DfE guidance: Keeping Children Safe in Education (September 2026) Part 1.

.

The Designated Safeguarding Lead

At Children's House, the Designated Safeguarding Lead is **Guthsna Khan**. The Deputy DSL is **Mirka Mahon**. At Old Palace, the Designated Safeguarding Lead is **Alison Bowley** and the Deputy DSL is **Layla Rahman**.

The Designated Safeguarding Leads take the ultimate lead responsibility for safeguarding arrangements within the federation's schools on a day-to-day basis, including online safety and understanding the filtering and monitoring systems and processes in place. They are responsible for making referrals to the duty officer when there have been concerns raised by any member of staff. The Designated Link Governor for Safeguarding is **Helen Jenner.**

The Designated Safeguarding Lead and Deputy will liaise closely with children's social care and other agencies in line with the practices set out in 'Working Together to Safeguard Children' and 'THSCP Arrangements'. They will be given the time, funding, training and support to provide advice and guidance to other staff on child welfare and protection matters, to take part in multi-agency meetings (or to support other staff to do so) and to contribute to the assessment of children.

The DSL takes the lead on supporting pupils during standard and non-standard transition points and ensuring that relevant information for the safeguarding of these children is shared. This includes ensuring that safeguarding files are sent separate from the main pupil file to the new school within the first 5 days of the child starting there and that appropriate follow-up is done if the federation is not receiving safeguarding information from the previous school the child attended.

If the federation has not received the safeguarding records for new pupils within the first 5 days of the pupil starting during standard and non-standard transition points, then the federation will proactively reach out to the previous school for the transfer of safeguarding files.

The Designated Safeguarding Lead will liaise with the ICT technician to ensure a formal review of the filtering and monitoring system is checked for effectiveness once an academic year and these will be recorded and maintained.

There are 3 additional members of SLT who have completed the Safeguarding Designated Training at Level 3, to ensure there are robust cover arrangements in place if the Designated Lead is unavailable.

Types of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

There are four main types of child abuse, although in most cases multiple issues will overlap.

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 noncontact 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 (Peer on Peer).

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 can include persistent criticism, belittling, name calling (verbal abuse). 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 online), 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 supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. The federation is aware of the borough's LBTH Neglect Guidance toolkits and understands its important role in identifying children who may be suffering from Neglect.

In addition, members of some communities hold beliefs that may be common within particular cultures but which are against the law in England. So called 'honour based' violence are all forms of abuse and should be handles as such, regardless of the family's motivation. If staff have any doubts, they should speak to the Designated Safeguarding Lead. Examples of particular practices include:

Forced Marriages - A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a

marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). This should not be confused with arranged marriages between consenting adults. 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.

Under-age Marriages - In England, a young person cannot legally marry nor have a sexual relationship until they are 16 years old.

Female Genital Mutilation-This comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of abuse with long lasting harmful consequences. Staff need to be alert to the possibility of a girl being at risk of FGM or already having suffered FGM, ensuring that any concerns are referred to the DSL. Where a teacher discovers an act of FGM appears to have been carried out on a girl under the age of 18, they have a legal duty to personally report this to the police and to discuss the case with the Designated Safeguarding Lead.

Breast Ironing- This is a traditional practice in the West African republic of Cameroon by which girls as young as 10 have their chests pounded with hot objects to disguise the onset of puberty.

Virginity Testing and Hymenoplasty-This is an illegal practice in the UK where women and girls are coerced, forced and shamed into undergoing these procedures, often pressurised by family members or their intended husbands' family in the name of supposedly upholding honour and to fulfil the requirement that a woman remains 'pure' before marriage. Some practitioners issue a certificate to prove 'virginity' after a virginity test or hymenoplasty, while some will simply tell the family or community members whether a woman or girl has 'passed' a virginity test.

Ritualistic Abuse -Some faiths believe that spirits and demons can possess people (including children). What should never be condoned is the use of any physical violence to get rid of the possessing spirit. This is physical abuse and people can be prosecuted even if it was their intention to help the child.

Extra Familial Harm

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the federation and family. All staff should consider whether children are at risk of abuse or exploitation in situations outside of their families. These risks take a variety of different forms and children can be vulnerable to multiple harms, including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence, county lines and financial exploitation (including scams and financially sexual extortion or sexploitation). When/if referring to Children's Social Care, the federation will consider what is known about the child's wider context and ensure it is reported clearly to the relevant agencies.

Child Sexual Exploitation

CSE is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual

activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Some of the following can be indicators of CSE:

- 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.

The Children's Society has provided useful guidance on Child Sexual Exploitation to support this area.

Child Criminal Exploitation

CCE is where an individual or group (including organised network or gangs) takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being coerced into moving drugs or money, being involved in County Lines, forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- 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.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal

exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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. Metropolitan Police information leaflets raising awareness about Cuckooing are available from the council website in English, Bengali and Somali.

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

Serious Violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.

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. The following can increase the likelihood of involvement (however not limited to), such as being male, frequently absent or permanently excluded, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

If practitioners have concerns that a child may be a potential victim of modern slavery or human trafficking then a referral should be made to the National Referral Mechanism12, as soon as possible.

If have any concerns about a child carrying or using a weapon (or expressing intent to do so) should report it to the Designated Safeguarding Lead (DSL) or a deputy. The DSL will assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. This includes putting in place a safety and support plan.

In addition, in a similar way to protecting children from other forms of harm and abuse, the federation has a responsibility to protect children from the **risk of radicalisation and extremism**. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of the federations' 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.

The Prevent Duty has four general themes:

1. Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. The federation will demonstrate both a general understanding of the risks affecting children in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.
2. The Prevent duty builds on existing local partnership arrangements. Safeguarding arrangements take into account the policies and procedures of the THSCP Board. Effective engagement with parents is essential, as they are in a key position to spot signs of radicalisation, and assistance will be provided to support families who raise concerns.
3. Education settings must ensure that Prevent awareness training is provided so that staff are equipped to identify children at risk of being drawn into terrorism and to challenge extremist ideas. The Designated Safeguarding Lead has undertaken Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
4. Education settings must also ensure that children are safe from terrorist and extremist material when accessing the internet in the federation. The federation's internet provider, LGfL provides a filtering system.

The federation will discuss any concerns in relation to possible radicalisation with a child's parents in line with our safeguarding policies and procedures, unless there are specific reasons to believe that doing so will put the child at risk. Staff will remain alert to signs which may indicate radicalisation, such as changes in a child's behaviour, expression of radical views or attempts to seek to hide their views. Any concerns will be referred to the Designated Safeguarding Lead, in the same way as for other forms of abuse and reported in the same way. Where appropriate a referral may then be made to the Channel programme. Across the curriculum, the federation will equip children with the skills needed to stay safe online and will promote fundamental British values as part of SMSC to allow children to build their resilience to radicalisation, by teaching them to explore issues critically, to weigh up evidence, to debate and to make reasoned arguments.

Child on Child Abuse (including Harassment and violence)

The federation recognises that children are capable of abusing other children and do not assume it is not happening if there are no reports. Abuse is abuse. It will not be tolerated or should not be dismissed as 'banter' or 'part of growing up'. Child-on-child abuse is preventable through early identification of risk and timely, evidence-based support. As with all forms of abuse the occurrence of child-on child abuse is an infringement of a child's human rights. All staff have a role in challenging inappropriate views and behaviours, as dismissing or tolerating them risks normalizing such behaviours. Cases of child on child

abuse must therefore be alerted to the Designated Safeguarding Lead in the usual way via CPOM and all staff are aware of the procedures. This can include (but is not limited to):

- Bullying- including cyberbullying, prejudice-based and discriminatory bullying. Prejudice and discrimination are 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.
- physical abuse such as biting, hitting, kicking, shaking, hair pulling, online (encouraging/threatening physical action).
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which maybe standalone or part of a broader pattern of abuse.
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos, including self- generated imagery, deep fakes and digitally altered content. Also pressuring another person to send sexual imagery or video content.
- 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;
- upskirting – taking a picture under a person's clothing without their permission, which is a criminal offence
- initiation/hazing -a type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- abuse in intimate personal relationships between peers.
- Online abuse- this can take the form of abusive, harassing, and misogynistic messages, the nonconsensual sharing of indecent images (including nudes and semi nudes), especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Those impacted by child on child abuse will be offered a 'check in chat' to speak with the Year Group Leader (Old Palace)/ DSL (Children's House) or another trusted adult and through the discussions any further support will be identified. The Behaviour, Anti Bullying and Online policy identify additional support and procedures in place.

Different gender issues can be prevalent when dealing with child on child abuse. All child on child abuse is unacceptable and will be taken seriously. There are times when children might be at highest risk around the school day, such as immediately after school

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 federation 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.

Sexual violence and sexual harassment can occur between two children of **any** age and sex. The abuse may be perpetrated by a younger child towards an older child because of an imbalance of power. 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 through a group of children sexually assaulting or sexually harassing a single child or group of children. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. It 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. Some examples include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment (non-consensual sharing of sexual images and videos; sexualised online bullying; unwanted sexual comments and messages, including, on social media; and sexual exploitation; coercion and threats

It is essential that all victims are reassured 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. As part of the reassurance to children, it will be made clear to children that law is in place to protect them from abuse rather than to criminalise them.

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

Staff should be aware of the importance of:

- challenging inappropriate behaviours within the school community;
- 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", including misogyny and misandry.

- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours will help to normalise them.

It is important to know the following:

o children under the age of 13 can never consent to any sexual activity;
o the age of consent is 16
o 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 federation will make a referral to Children's Services via the Multi Agency Support Team.

On a case-by-case basis the federation 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. The federation 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. The federation 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 federation, 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.
To support its overall prevention of and response to harmful sexual behaviours, the federation will give consideration to the best practice resources such as that available through the Contextual Safeguarding Program in particular the Beyond Referrals Toolkit: Harmful Sexual Behaviours

Depending on the type of abuse, additional guidance may also be found in the federation's policies on behaviour, anti-bullying and online safety. All incidents of bullying, including cyber bullying, prejudice-based, misogyny and discriminatory bullying, are logged and monitored to ensure that the victim and perpetrator receives the appropriate support.

Online

The federation 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 federation devices and the federation network.

In accordance with the Prevent Duty, the federation has appropriate filtering and monitoring systems in place when children access the internet via federation devices and when using the federation networks. At Old Palace the Senso monitoring system is also in place. The federation 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.

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. It is essential that children are safeguarded from potentially harmful and inappropriate online material. As a federation we are to protect and educate pupils, students, and staff in the use of technology and identify, intervene in, and escalate any concerns where appropriate. Additional information can be found in the Online Safety Policy. All staff should report any online issues via CPOMS, alerting the Designated Safeguarding Lead.
The Online Safety Act 2023 among other things makes cyberflashing, threatening communications and the promotion of self-harm criminal offences.

Artificial Intelligence- Artificial Intelligence is the current technological innovation evolving with speed, which will benefit society including the education sector but also generate great risks and challenges compromising the safety of children, for example, Generative Artificial Intelligence is being misused to create sexualised images and videos of children. AI generated images (deepfakes) of pupils are a safeguarding concern that must be recorded on CPOMs and escalated.

The federation 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. Parents/carers are regularly advised that children under the age of 12 are not permitted to have social media accounts. Should it be found that a child has an account, the Designated Safeguarding Lead should be informed via CPOMs. The parents will be informed and the federation will monitor the account to ensure that it is closed. Parents/carers are also informed that children should not have instant messenger (such as Whatsapp) until the age of 16. The federation holds workshops and has monthly articles in the newsletter, to remind parents and pupils of the risks posed by social media and instant messenger and to promote strategies to help children to stay safe online, using links such as https://www.net-aware.org.uk/. The federation also offers 1:1 support with the ICT technician for parents/carers.

Mobile Phones

In accordance with Department for Education's guidance, Mobile Phones in Schools (June 2026), the federation prohibits the use of mobile/smart phones throughout the school day as set out in the Behaviour Policy.

Children are not permitted to use mobile phones on the federation premises. Any mobile phones brought into the federation must be handed into the office immediately and then collected at the end of the day.

Annex D of the KCSIE 2026 provides additional information which the federation refers to, to help keep children safe online (including remote learning) and is referenced in the Online Safety Policy.

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.

Domestic abuse, can also include child-to-parent or care giver abuse, where a child or young person's behaviour results in the maltreatment of a parent or those with parental responsibility. 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 are aware that all children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home because of the abuse. Children can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. In response to safeguarding reports received about children involving Domestic Abuse, the federation will make contact with Children's Social Care for advice and guidance. Where appropriate federation will complete a DASH Risk Assessment with the individual reporting as a victim of Domestic Abuse. The federation is also part of the Operation Encompass Scheme.

Mental Health

The federation has 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.

In regards to concerns, staff report it as a 'cause for concern' via CPOM to the DSL (Mental Health Lead) and Deputy. Using the Pyramid of Need (Young Minds), along with the THSCP Levels of Need Guidance, appropriate steps will be taken which could involve a referral to the nurture group, an Early Help referral, referral to the School Social Worker, School Therapist or CAMHs.

In the support that is provided to children questioning their gender, the federation will adhere to any specific guidance issued by the Department for Education and the KCSIE 2026:

Members of staff should not adopt any changes relating to social transition unless a decision has been made by the school following involvement from the child's parents or carers. The Federation will make sure that the decision-making process around requests for support with social transition is documented and records are kept.

Recognising Signs of Abuse

It can often be difficult to recognize abuse. The signs listed in this document are only indicators and many can have reasonable explanations. Children may behave strangely or seem unhappy for a variety of reasons as they move through the stages of childhood or their families experience changes. It is nevertheless important to know what **could** indicate that abuse is taking place and to be alert to the need to consult further.

- Someone can abuse a child by actively inflicting harm or by failing to act to prevent harm
- Abuse can take place within a family, in an institutional or community setting, by telephone, other electronic device or on the Internet
- Abuse can be carried out by someone known to a child or by a complete stranger

In general staff employed within the federation will not have the expertise to diagnose child abuse, but do have a responsibility to be alert and aware of the signs. The presence of one or more signs, or their repeated presence, might raise concerns and should be used as a prompt for discussion with the Designated Safeguarding Lead. Similarly, if staff are unsure they should always speak to the Designated Safeguarding Lead for further guidance.

Possible Indicators and Signs of Abuse

Neglect	Physical Abuse	Sexual Abuse	Emotional Abuse
Hygiene	Bruising or other significant signs on the body	Showing an awareness of sexual behaviour that is not attributable to their age	Erratic, sometimes violent, behaviour

Inappropriate clothing	New injuries frequent and recurring	Abnormal behaviour: tearful, withdrawn, flinches when touched	Overly physical or affectionate
Lack of Social Skills	Giving inconsistent or false excuses for injury	Aggressiveness	Reliance on adult contact
Underweight	Refusal to change for PE	Physical evidence ie. bruising	Short concentration span
Under stimulated	Excessively nervous behaviour, such as rocking, hair twisting	Medical evidence ie. Toilet problems transmitted disease, itching or discharge	Unusual emphasis on a normal family life
Inadequate medical provision	Withdrawal and backing away from adults	Play representations and drawings with disturbing features	Regularly tearful

Reluctant to go home	Fear of medical help	Written evidence in writing	Isolation or attention seeking
Low self esteem	Aggressive behaviour	Complaints for other children	Overeating/loss of appetite
Delayed social development – poor language & speech	Unable to play, no sense of joy	Child complaining of soreness, discomfort or recurring abdominal pain	Self-inflicting injury

Further information on the signs and symptoms of abuse can be found at: NSPCC- https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/

Procedure for Reporting Concerns

Listening to the Child

Regardless of how knowledge of abuse arises, the first steps when talking to a child are critical. Often a child will be frightened, confused and feeling vulnerable. 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. 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. Children need to be assured that their concerns will be taken seriously by staff and action will be taken.

The child should be reassured in a calm manner that he/she is safe and has done the right thing by telling someone. Listen carefully to the child without leading their conversation or showing any kind of shock reaction.
A child often assumes an irrational guilt complex, feeling that the abuse is somehow his/her fault. Again reassurance that he/she is not to blame should be given. Emphasise that the claims are taken seriously and that it will be necessary to involve someone else to take action to safeguard and protect them.

At Old Palace, during each half term, children are delivered a 'Safeguarding' assembly, which reminds them of their rights, who they can talk to if they have a concern and how school keeps them safe. At Children's House support will be provided by their Key Person

Allegation
In the event that a child makes an allegation of abuse against an adult, another child or a member of staff, it is important that you:

- Be accessible and allow the child to speak freely
- Listen to them and/or closely observe their presentation and behaviour
- Remain calm and let the child know that you take what they are saying seriously
- Do **not** use leading questions or attempt to interview them yourself
- Do **not** jump to conclusions, speculate or accuse anyone
- Do **not** promise to keep what they tell you a secret. Let them know that you will need to tell someone else in order to help them
- Sign into the CPOM systems as soon as possible and create a record of the incident (cause for concern), alerting the Designated Safeguarding Lead and Deputy. This is so the DSL or Deputy can deal with the allegation on the same day as if a child is deemed to be at significant harm, MAST will need to investigate immediately.
- If for any reason you are unable to access CPOM, complete a paper **Record of Concern** form (available from the Children's House office & Old Palace staffroom) and hand this to the Designated Safeguarding Lead as soon as possible.
  If they are not available, speak to another member of the senior leadership team.

It is essential that a written record is kept of any concerns raised and the discussions regarding them. The decisions made and the reasons for these must also be recorded in writing. When completing a written report as much detail as possible should be provided, including:

- The nature of the allegation.
- Details of any bruising or other injury.
- Times, dates and any other relevant information.

- Dates, times and names of those adults involved in the conversation with the child.
- Initials should be used when using staff and children's names.

A copy of any other relevant information (e.g. a picture or a piece of writing) can be uploaded and attached. The DSL will identify where the allegation falls on the THSCP Levels of Need guidance to decide what level of safeguarding response is required. If in doubt about the level of need, the DSL will telephone the LBTH Multi Agency Support Team (MAST) for a discussion. If the child is already known to MAST, then the DSL will communicate safeguarding concerns with the allocated Social Worker.
If a child has been receiving Early Help support from the school and other agencies and there is no improvement in the child's outcomes, then the DSL must refer the child to Children's Social Care.

When a call is made to the MAST advice line 020 7364 5006 (Option 3) 020 7364 5601/5606/5358/7796 the federation will then wait to receive advice from the duty officer. The DSL will also complete a MAST request for support from and send it securely to MAST. Once advice has been received, the federation will act upon this, contacting parents if advised to do so. If parents are advised to carry out further discussions with the allocated social worker, the federation will arrange any joint planning meetings, where necessary. The Headteacher will be kept informed of the referral and any subsequent action. Ultimately, the best interests of the child must be at the centre of all decision making, behaviours and action taken in relation to children
All members of staff take responsibility for writing up clear and comprehensive safeguarding concerns using CPOMs. Through the DSL's oversight safeguarding records include:

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

If in doubt about recording requirements, staff should discuss with the DSL (or a deputy).

Where a child is at risk of immediate danger or harm a call must be made straight away to the Child Protection Advice Line (0207 364 3444) or the Police. Anyone can make a referral, so action must not be delayed if the Designated Safeguarding Lead or their Deputy cannot be found, such as out of normal working hours. Where referrals are not made by the Designated Safeguarding Lead, they should be informed of the referral as soon as possible. In an emergency take the action necessary to help the child, including calling 999 if necessary.

The Designated Safeguarding Lead and Deputy also understand when they should consider calling the police and what they expect when they do, following the National Police Chiefs' Council (NPCC) guidance.

If, after a referral to Children's Social Care, the child's situation does not appear to be improving, the DSL will consider following local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. In accordance with the THSCP Levels of Need Guidance, the DSL will first make contact, in writing, with the team manager followed by the service manager followed by the divisional

director. At every level of escalation there should be discussion and concerted effort to resolve any professional difference. The DSL, at each point of escalation, will put the concerns in writing.

When a child arrives with an injury at Children's House or Old Palace:

1. Ask the parent to provide an account of how the injury was sustained
2. Record this **immediately** on CPOMS, alerting the DSL
3. The DSL will then arrange to speak to the child separately to gain their explanation. CPOMs will be updated and appropriate follow up action taken.

Arrangements During Holiday Time

Procedures for staff remain exactly the same- to log on CPOMs as this will alert the DSL and Deputy directly. The DSL will then assess the allegation and update.

For professionals within social care, to email the DSL directly and if they do not have the DSL's email, they are to email the admin account of the relevant school (admin@oldpalace.towerhamlets.sch.uk or admin@childrenshouse.towerhamlets.sch.uk) stating 'Urgent Safeguarding' in the subject bar.

For other members of the public they should follow the same procedure, emailing the relevant school admin account.

In both these cases, the email will then be forwarded onto the appropriate DSL.

Offsite Arrangements

Where services or activities are provided separately by another organisation outside of normal school hours, the federation 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 within the federation. The safeguarding standards expected of these external organisations, when they are not currently regulated, are set out in the Department for Education's After-School Clubs, Community Activities and Tuition: Safeguarding Advice for Providers (September 2023, Updated 29 May 2025).

Allegations Against Members of Staff

When an allegation is made against a member of staff (including contractors, supply staff, trainee teachers and volunteers), the federation's procedures will be followed. The procedures are compliant with KCSIE 2026 part 4 and THSCP supplementary guidance- Managing Allegations of Abuse against Staff – September 2025.

An allegation is made against a member of staff including supply staff, volunteers and contractors when a member of staff 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 volunteers.

In the case of an allegation against a member of staff, the Headteacher should be told and the Local Authority Designated Officer (LADO) -Melanie Benzie will be informed and the federation will await their advice on how to proceed.

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 and also informing the relevant agency. In the event of an allegation being made against the Designated Safeguarding Lead, this should be reported to the Headteacher. If the allegation is against the Headteacher this should be reported to the Designated Safeguarding Lead, who will then liaise with the chair of the Governing Body.

Respect for the child's privacy is paramount and the staff involved must not discuss details of the allegation with anyone other than those necessary to carry out the procedures outlined above. The wishes of the child will be taken into consideration when determining what action to take, but ultimately any action taken will be based on their best interests. Details of the child's views and feedback will be recorded within the written record of the referral.

The federation recognises that an allegation can be distressing for a member of staff to deal with. Should this be the case, the member of staff should discuss this with the Headteacher so support can be arranged.

When an allegation is received relating to an incident that happened when an individual or external organisation was making use of the federation premises for activities involving children, the headteacher should seek the advice of the LADO.

Concerns that do not meet the harm threshold

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 federation's procedures, which are found in the federation'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.

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO). Examples of low-level concerns could include
- being over friendly with children
- having favourites, including giving gifts.
- taking photographs of children on their mobile phone (when not agreed with SLT for school/nursery purposes)

- engaging with a child one-to-one in a secluded area or behind a closed door ▪ using inappropriate sexualised, intimidating or offensive language.

These concerns should be reported directly to the DSL. If there are concerns about the DSL, these should be reported directly to the Headteacher. Staff are encouraged to self-refer if they have found themselves in a situation which might be misinterpreted or they have behaved in a way that falls below professional standards. The DSL records all low-level concerns, which are reviewed so that patterns of concerning behaviours can be recognised and appropriate action can be taken. Low level concerns shared about agency staff and contractors should be notified to their employers.

Early Help and Family Help

All staff need to be aware of the Tower Hamlet's early help process, understand their role in it and are able to identify children. From time to time concerns may come to light, which despite not reaching the threshold for intervention, help to build up a picture of a child at risk of possible harm. It is important that such concerns are identified early, so help can be provided before they escalate. Universal services and community-based early help (support before targeted intervention) and the targeted early help level of Family Help (support coordinated by the local authority) is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Staff should log any 'cause for concern' on CPOM. This will be reviewed by the Designated Safeguarding Lead, the Federation's Attendance and Welfare Adviser and Social Worker. In addition, the identification of vulnerable pupils is a standing item on the agenda of fortnightly progress meetings.

At Old Palace, where concerns are identified, support may be provided by the Parent Support Workers, the School Social Worker, School Therapist or the Designated Safeguarding Lead. The DSL may contact the LBTH MAST for advice and support, if required. When a referral is made for a family to work with the School Social Worker, a MAST referral form still needs to be completed and sent to MAST, stating the name and contact of the school social worker who will be providing early help support- Shahnaz Choudhury. This may also include a Community-based Early Help assessment and Referrals to Family Help.

Effective early help relies upon local organisations and agencies working together, this may include signposting families to other agencies or supporting other agencies in completing a multi-agency assessment. If a child has been receiving early help support from the federation and other agencies and there is no improvement in the child's outcomes, then the DSL will refer to Children's Social Care.

Staff should, in particular, be alert to the potential need for early help for a child who:

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

- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision Providers or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'- based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.
- is repeatedly removed from the classroom or are on a part-time timetable.
- is exhibiting early signs of abusive, violent, or harmful behaviours.

Social Inclusion Panel

When an EHA has been completed and a Team Around the Family is in process, the federation 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.

Children Absent from Education and Children Missing in Education

The federation closely monitors attendance, absence 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, neglect and exploitation, including child sexual abuse, child sexual exploitation, and child criminal exploitation (county lines).

In accordance with the DfE's statutory guidance Working together to improve school attendance, the federation follows up on absences and addresses persistent and severe absence as part of its safeguarding duty.

Such an approach prevents the risk of these children becoming children missing education in the future. Staff address daily absence and persistent absence as soon as these problems emerge as part of the federation's early help response. Staff should be alert to children already known to be vulnerable especially Children known to a Social Worker and Looked After Children, since absence from education may increase known safeguarding risks within the family or in the community. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage. The federation has the following procedures in place to help prevent the risks of children going missing:

First day calling – the school will attempt to contact parents by telephone on the first day of absence
Home Visits – if the federation has been unsuccessful in contacting the parents by telephone, a visit to the child's home will be carried out on the second day of absence
Notifying the Local Authority – should a child be absent without the federation's permission for a continuous period of 10 school days, the federation's Attendance Welfare Adviser (AWA) will be notified. It is their responsibility to pass this information on to the local authority

Taking pupils off roll – At the point a child becomes eligible to be taken off the school admissions and attendance register, a notification form will be completed and emailed to the local authority's Pupils Admissions Team

Requesting Records – The AWA will be notified when, following a request, the records of a child transferring to the federation have not been received. Likewise the AWA will be notified if the school a child has transferred to does not issue a request for their records to be sent.

Record Keeping – Full records will be kept where pupils change school, so that these can be referred to should any issues subsequently arise.

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

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

Children missing in education are children of compulsory school age who are not registered pupils at an education setting and are not receiving suitable education otherwise than at a school. Children missing in 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 (EHE)

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

When a parent informs the headteacher of their intention to electively home educate their child, the federation will convene and coordinate a meeting between the LA, relevant federation staff, parents and all key professionals currently working with the child and family. In accordance with Keeping Children Safe in Education 2026 and LBTH Policy this meeting has to occur before any final decision is made by the parents, to ensure that the best interests of the child have been taken fully into account and carefully considered. The occurrence of this meeting is especially important when the children have known vulnerabilities including Children known to a Social Worker and children with SEND.

Vulnerable Pupils

Children with special educational needs and disabilities (SEND)

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

- 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 SEND being disproportionally impacted by behaviours such as 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.

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

Staff are trained to understand and be aware of these additional barriers to ensure this group of children are appropriately safeguarded. They are also aware that children with SEND may be more vulnerable when online and using digital platforms.

Looked After Children, Previously Looked After Children & Children in Kinship Care Arrangements

Staff have the skills, knowledge and understanding to safeguard Looked After Children. The DSL (Designated teacher) and year team will work alongside relevant agencies, including 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, to support and promote the educational outcomes of this vulnerable group of children, including taking immediate action to safeguard when required.

The federation will work with the Tower Hamlets Virtual School to promote and champion the attendance, attainment and progress of children in kinship care arrangements. Since September 2024, the Virtual School has a non-statutory responsibility to promote the education of children in kinship care arrangements regardless of whether the children have been previously looked after by the Local Authority. Kinship Care is any situation in which a child is being raised in the care of a friend or family member who is not their parent. The arrangement may be temporary or longer term. Examples of kinship care arrangements include Private Fostering Arrangements, Special Guardianship Order, and Child Arrangements Order, where the child is being cared for by a relative or friend who is not a parent.

Private Fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of federation staff through their normal interaction with parents and children. The federation will notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

Young Carers

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

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

No young carer or young adult carer should take on caring roles which are inappropriate, excessive, or which negatively impact their life opportunities, health or wellbeing. The Federation will be alert to the needs of young carers and recognise that caring responsibilities can impact attendance, attainment, behaviour and wellbeing. Early identification is key to making sure young carers receive support at the right time from the right services

The federation is committed to raising awareness about young carers, among staff, pupils and parents/carers, so that young carers can be identified and receive the support they need. The federation will utilise the Young Carers in Schools program resources provided by the Carers Trust and the Children's Society: https://youngcarersinschools.com/ alongside the Tower Hamlets guidance for schools, 'Young Carers in Schools: A guide for education practitioners to identify and support young carers in schools' and other resources available from THESS's safeguarding resource webpage.

The DSL will take the lead for Young Carers at the federation and ensure that there is a whole school approach to improving the outcomes for young carers.

When young carers are identified, the DSL or Deputy DSL will have a conversation with the child using if helpful the Tower Hamlets Young Carers Identification Tool.

The Federation recognises that in accordance with the Care Act 2014 and the Children and Families Act 2014 young carers have the right to an assessment by the Local Authority to identify needs and support and the person they are caring has the right to have a reassessment of their needs.

If the federation thinks that the child or young person or a member of their family requires more support than the federation alone can provide, the DSL/Deputy DSL should refer to the Tower Hamlets Multi-Agency Support Team (MAST), so that a Young Carers Assessment can be undertaken. This assessment can help to identify what additional support can be provided from other services including housing and adult social care. The federation should complete the Tower Hamlets Young Carers Identification Form and attach it to the MAST referral form that is sent.

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. In such cases, guidance of each step of the process will be provided by a familiar adult and additional support and special measures will be offered.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. The federation can provide additional support for the child's wellbeing, should they want it.

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. The federation can also offer additional support for the child's wellbeing throughout this time, should they want it.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. 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. As part of the federation's Early Help offer, referrals can be made to the Local Housing Authority, via the Old Palace School Social Worker. A referral directly to children's social care may also be necessary where a child has been harmed or is at risk of harm. 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. 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

Alternative Provision Provider

When the federation places a pupil with an alternative provision provider in the best interests of the child, the federation will continue to be responsible for the safeguarding of that pupil and will take action to be satisfied that the placement meets the pupil's needs.

In accordance with KCSIE 2026 and the statutory guidance Arranging Alternative Provision, as a minimum, the federation will have a written record of where a child is based during school hours, the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. The federation will regularly review at least half termly the alternative provision placements to obtain assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the federation will immediately review the placement and consider termination, if necessary, unless or until those concerns have been satisfactorily addressed.

In fulfilment of its safeguarding responsibilities towards the pupil placed there, the federation will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the Alternative Provider, for example, the checks that schools would otherwise perform on their own staff. The federation will also obtain written confirmation that the alternative provider will inform the federation of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

Raising Further Concerns

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the federation's safeguarding procedures. These should initially be discussed with the Headteacher, unless there is reason not to do so, and will be taken seriously. Alternatively, the staff member could follow the federation's Whistle Blowing procedures, a copy of which is displayed in the staffroom. To raise whistleblowing concerns externally, federation staff are advised to report to the Prescribed Bodies in the Government's List of Prescribed Bodies and Persons, which includes for safeguarding related concerns the NSPCC: Whistleblowing Advice Line 0800 028 0285 which is free & anonymous, more information can be found at nspcc.org.uk/whistleblowing.

Where a member of staff feels that the actions taken following a referral have not improved the child's situation, they should bring this to the attention of the Designated Safeguarding Lead. Should they continue to be unhappy with the situation they should contact the MAST Advice Line (0207 364 3444) directly to alert them to their concerns. The federation recognises the expertise staff build up by undertaking safeguarding training and by managing concerns on a daily basis. Staff are therefore encouraged to contribute to and shape the safeguarding arrangements put into place by the federation.

Information Sharing and Data

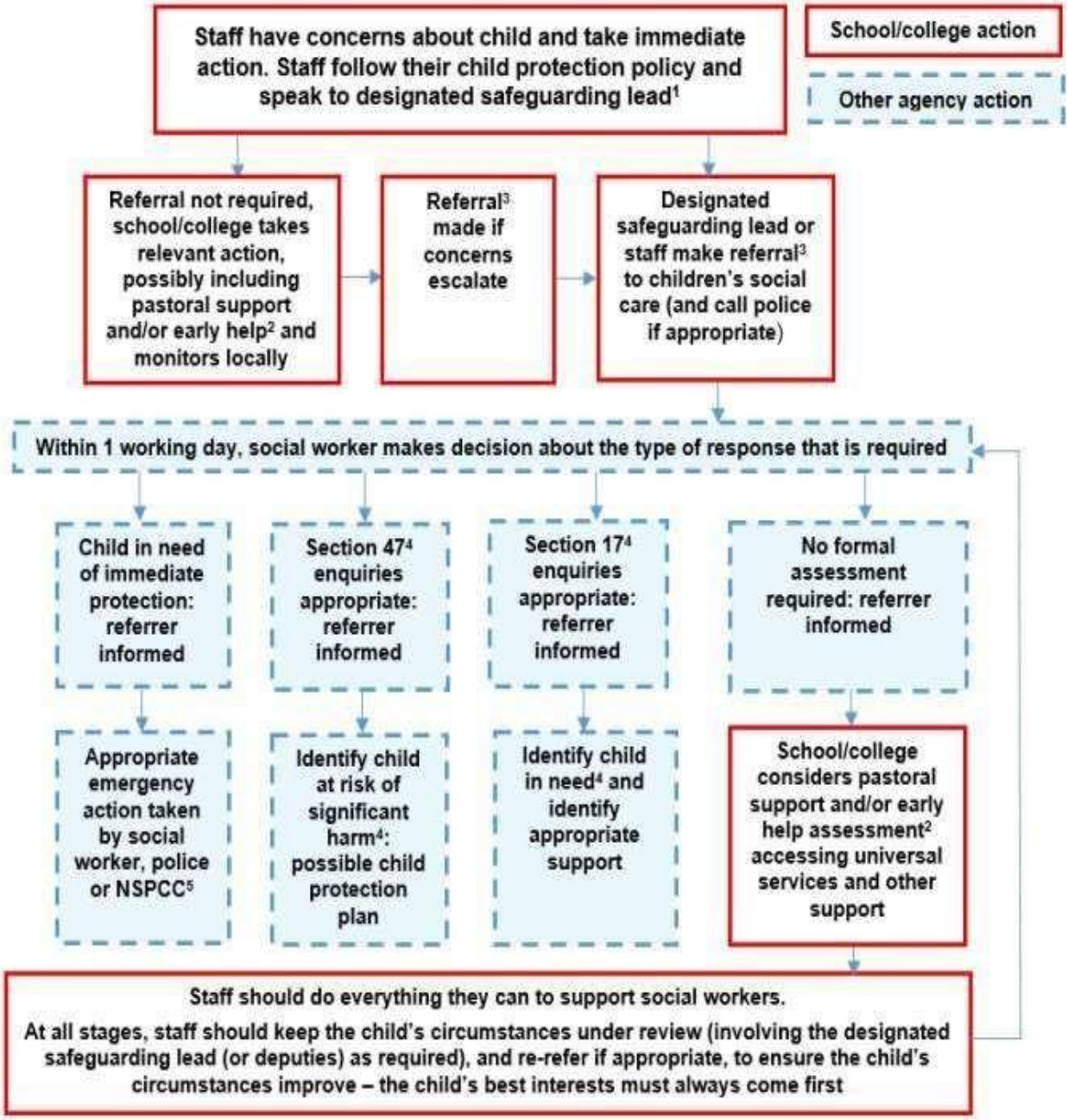
Early information sharing between staff, organisations and agencies is essential for effective identification and to ensure that an individual receives the right services at the right time. Information should be shared with the right people between and within agencies. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. Every practitioner must take responsibility for sharing the information they hold, and cannot assume that someone else will pass on information, which may be critical to keeping a child safe.

Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided in the Data Protection Act 2018 and the GDPR.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

Where safeguarding information is stored electronically and online, the Federation maintains cybersecurity measures in line with the **Cybersecurity Standards for schools and colleges**. The Governing Body ensures these systems are robust enough to strengthen resilience, reduce the risk of disruption, and mitigate safeguarding risks associated with potential data breaches, compromised devices, or the misuse of accounts

Actions where there are concerns about a child



Additional Sources of Support

Useful Numbers

LBTH MAST Advice Line 0207 364 3444/5601/5606
Early Help Hub 020 7364 5006
Police Child Abuse Investigation Team (CAIT) 0208 217 6484 (or use 999 if not available)
Children's Social Care Emergency Out of Hours Duty Team (5:00pm onwards) 020 7364 5006- option 3 DfE Extremism Line: 020 7340 7264
NSPCC 0808 800 5000
Childline England 0800 1111 **Website**
https://www.gov.uk/report-child-abuse-to-local-council

Related Policies & Document

Staff Handbook & Code of Conduct
Supply Teacher Class Packs
Induction Policy
Volunteer Policy
Safer Recruitment Policy
Behaviour & Anti bullying (including physical restraint)
Online Safety Policy
Attendance Policy
Confidentiality Policy
NPCC guidance
DfE: The Prevent Duty
DfE: Children Missing in Education
HM Government: What to do if you're worried a child is being abused
Section 175 of the Education Act 2002 (Local maintained schools only)
Section 157 of the Education Act 2002 (Independent schoosl only, including academies and Free Federations)
The Education (Independent Federation Standards) Regulations 2014 (Independent schools only, including academies and Free schools)
The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
Education and Training (Welfare of Children) Act 2021 (16-19 Academies and Independent Training Providers)
Human Rights Act 1998
The Equality Act 2010
Data Protection Act 2018 and the GDPR
The Safeguarding Vulnerable Groups Act 2006
Working Together to Safeguard Children 2026
Keeping Children Safe in Education 2026 (Department for Education, 1st September 2026)
Information Sharing: advice for practitioners providing safeguardMEDICAing services (Department for Education, May 2024)

What to do if you're worried a child is being abused 2015 (Department for Education, March 2015)
The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014) The Teacher Standards 2012

- London Child Protection Procedures revised 7th Edition (London Safeguarding Children Board,31st March 2025)
- PAN London &Tower Hamlets Safeguarding Children Partnership Levels of Need Guidance (September 2023)

Early Years Foundation Stage Statutory Framework for group and school-based providers (Updated 1st November 2024)

- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Child Protection Procedures - September 2025

- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Managing Allegations of Abuse against Staff and Concerns that do not meet the harm threshold – September 2025

Tower Hamlets SCP Multi-Agency Escalation and Resolution Policy

Last Review: July 2026