Child Protection Policy
(Published on website)

Date agreed: October 2025　　　　　**Review Date:** October 2026

CONTENTS

Ethos and Values

The safeguarding of children is a joint responsibility for all staff (including volunteers, visitors, students and governors) working in the school, therefore this policy applies to all. All procedures have been written in accordance with Keeping Children Safe in Education 2025 and reflect local safeguarding arrangements including the Tower Hamlets Safeguarding Children Partnership Supplementary Guidance documents on Child Protection Procedures and the Management of Allegations and Concerns that do not meet the Harm Threshold.

All staff at Stepney Park Primary School are well placed to observe the signs of abuse because they have daily contact with the children. Early recognition of the signs and taking safeguarding action is key to keeping children safe. That is why this policy and our safeguarding procedures are shared with all staff. Through CPD, staff are given the opportunity to refresh their knowledge and reflect on safeguarding practice.

In addition, we aim to develop an ethos in which children feel secure, their viewpoints are valued, and where they are encouraged to talk and listen.

This policy is published on the school website for anyone to access, at any time. All staff at Stepney Park Primary School have read and adhere to the policy. For new staff that join the school, time is given to read the policy.

At a minimum, the policy is reviewed annually to include any statutory updates. If an incident were to occur, new legislation or guidance is published that calls for an immediate review, it would be done in a timely manner.

1. CORE SAFEGUARDING PRINCIPLES

- The welfare of the child is paramount and underpins all discussions, decision making, and actions taken at the school.
- All concerns shared and reported by children 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 immediately on any suspicion or concern shared that may suggest a child is at risk of harm or has been harmed.
- The Designated Safeguarding Lead will ensure that all pupils and staff involved in safeguarding and child protection issues will receive appropriate support.

These 6 core principles are embedded within the school's safeguarding arrangements; underpin the school's safeguarding policies, procedures and systems; and pervade the whole school approach to safeguarding at Stepney Park Primary School.

2. PURPOSE OF POLICY

- To ensure all pupils on the school roll are effectively safeguarded including those pupils in Alternative Provision placements.
- 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/carers and other partners.

3. SAFEGUARDING LEGISLATION AND GUIDANCE

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

Legislation

- Section 175 of the Education Act 2002 (Local maintained schools only)
- 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

Guidance

- Working Together to Safeguard Children 2023 (HM Government December 2023, Updated 12th June 2025)
- Keeping Children Safe in Education 2025 (Department for Education, 1st September 2025)
- Information Sharing: advice for practitioners providing safeguarding services (Department for Education, 2015, Updated May 2024)
- What to do if you're worried a child is being abused 2015 (Department for Education, March 2015)
- Early Years Foundation Stage Statutory Framework for group and school-based providers (Updated 1st November 2024)
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014)
- The Teacher Standards 2012

4. PAN LONDON & TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP GUIDANCE

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

- London Child Protection Procedures revised 7th Edition (London Safeguarding Children Board, 31st March 2025)

- Tower Hamlets Safeguarding Children Partnership Levels of Need Guidance (September 2023)

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

- Tower Hamlets SCP LADO Procedures and Flowchart re Allegations made against staff working in the children's workforce - Information about reporting and managing allegations

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

- Tower Hamlets SCP Multi-Agency Escalation and Resolution Policy

5. TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP

The Children Act 2004 as amended by the Children and Social Work Act 2017 has brought about the establishment of the Tower Hamlets Safeguarding Children Partnership (THSCP). The Partnership coordinates the work of all agencies and ensures that this work is effective in achieving the best outcomes for Tower Hamlets children. The three statutory safeguarding partners have published arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. More information about the Tower Hamlets Safeguarding Children Partnership can be found on the website: www.thscp.org.uk

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

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

children safe, participating fully in the Rapid Review process and Child Safeguarding Practice Reviews, and supporting the agreed safeguarding priority areas for 2025-2027, which are Think Family and Adolescent Safeguarding.[1]

6. LOCAL AUTHORITY STRATEGY

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

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

7. KEY DEFINITIONS

Safeguarding and promoting the welfare of children is:

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

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[1] For more information on the Rapid Review process, Child Safeguarding Practice Reviews and Child Death Reviews, Working Together To Safeguard Children 2023 Chapters 5 and 6 should be consulted. Working Together 2023 paragraphs 76-81, 125-130, and 230-233 provide more information on the expectation of school's role within the safeguarding partnership arrangements. For further information on the THSCP's priority areas, please visit www.thscp.org.uk

- taking action to enable all children to have the best outcomes.

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

Child includes everyone under the age of 18.

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

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

8. ROLES AND RESPONSIBILITIES

The Governing Body have the strategic leadership responsibility for safeguarding arrangements at the school. As a collective body Governing Body/Trustees/Proprietor must have regard to all relevant statutory guidance issued, including *Keeping Children Safe in Education*, ensuring 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 for the education setting.

In accordance with the statutory requirement for a named member of the Governing Body to take leadership responsibility for safeguarding at the school, the Safeguarding Link Governor is Ros Coffey.

The headteacher 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.

Role / Responsibility	Staff Member	Contact Information
Headteacher	Edith Philipsen	admin@stepneypark.towerhamlets.sch.uk
Special Educational Needs/Disabilities Coordinator (SENDCo)	Nathalie Palacio	admin@stepneypark.towerhamlets.sch.uk
Designated Safeguarding Lead (DSL) Designated Teacher	David Smith	dsl@stepneypark.towerhamlets.sch.uk This email is also accessed by the Deputy DSL. During school holidays, this email will be periodically checked.
If you have a concern about a child, and school is not available, you can contact Tower Hamlets Social Care: **Tel:** 020 7364 5601 **Email:** MAST@towerhamlets.gov.uk (9am to 5pm, Monday to Friday) **Emergency duty team** **Tel:** 020 7364 5606 (after 5pm on weekdays and any time on weekends or bank holidays). **Always call 999 in an emergency.**		
Deputy Designated Safeguarding Lead	Khaleda Begum	dsl@stepneypark.towerhamlets.sch.uk
Chair of Governors	Linda Ewers	Email the clerk of the governors who will forward to chair of governors. traceymlee@icloud.com
Safeguarding-Link Governor	Ros Coffey	Email the clerk of the governors who will forward to safeguarding-link governor. traceymlee@icloud.com

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 school is not receiving safeguarding information from the previous school the child attended.

If the school 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 school will proactively reach out to the previous school for the transfer of safeguarding files.

All staff should recognise that as frontline workers they are in a vitally 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. See appendix 3 for Stepney Park Primary School's Safeguarding Procedure.

All members of staff take responsibility for writing up clear and comprehensive safeguarding concerns using the school's safeguarding record system - 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 designated safeguarding lead (or a deputy).

If in doubt about any safeguarding matter, staff should **always** speak to the DSL.

All staff are expected to keep the school values at the core of their daily conduct and understand that they have a legal duty to safeguard the child. Ultimately, the best interests of the child must be at the centre of all decision making, behaviours and actions taken in relation to children.

9. RIGHTS OF THE CHILD

The school upholds the Human Rights of the child in accordance with the Human Rights Act 1998.[2] 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:

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[2] https://www.equalityhumanrights.com/en/human-rights

• 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 characteristics) - see Equality Policy and Accessibility Plan found on the school website. 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.

At Stepney Park Primary School, we are committed to safeguarding and promoting the welfare of all children, including those with protected characteristics under the Equality Act 2010. We recognise that pupils with protected characteristics — including disability, sex, sexual orientation, gender reassignment, and race — may face additional risks or barriers, and we take proactive and proportionate steps to support them. Through our PSHEE (Personal, Social, Health and Economic Education) curriculum, pupils are taught about the protected characteristics in an age-appropriate and sensitive way. This helps to foster understanding, promote respect, and challenge discrimination or prejudice. We use this curriculum, alongside assemblies and wider school culture, to create a safe, inclusive environment where every child feels valued and heard. We also monitor pupil wellbeing, behaviour incidents, and pupil voice to identify any patterns of disadvantage or harm, and take positive action where needed — for example, through targeted interventions or support. We make reasonable adjustments for disabled pupils, including those with long-term medical conditions, to ensure their full participation and safety in school life. Overall, our approach ensures that safeguarding and equality are embedded across all aspects of school life.

As evident through the Serious Case Review Child Q's findings, 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.[3] 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.[4] The action plan recognises that schools have a powerful and significant role in changing narratives and bringing about social change through education.

One of Stepney Park Primary School's core school values is 'respect', which is explicitly taught and reinforced through the learning behaviours of 'empathy' and 'responsibility'. These values underpin our approach to inclusion and anti-racism and are woven throughout the curriculum and day-to-day life of the school. Through our PSHEE curriculum, pupils are introduced to and explore several of the Protected Characteristics, including race, in an age-appropriate way. These themes are also revisited through whole-school assemblies and cross-curricular learning, reinforcing key messages about respect, equality, and fairness.

The school along with other safeguarding partners is fully committed to implementing the Tower Hamlets Safeguarding Children Partnership's Anti-Racist Charter (2025) across its safeguarding practice.

10.   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

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

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

aware that other children who may be potentially more at risk of harm include

A Child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to 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 or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves;
- has returned home to their family from care; and
- is at risk of so-called honour-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day.

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.

11. CHILDREN IN NEED OF A SOCIAL WORKER

Children who have been allocated a social worker may have experienced abuse including neglect and belong to a family that has many complex circumstances. Staff should recognise that these children will have

experienced adversity and trauma that can leave them vulnerable to further harm, as well as educationally disadvantaged, and have a negative impact on their attendance, learning, behaviour and mental health.

When making decisions about safeguarding, carrying out a risk analysis, making a safeguarding response to concerns such as unauthorised and persistent absence, and providing pastoral and academic support, the school will take seriously the fact that the child in need of a social worker will require enhanced pastoral and academic support alongside that provided by statutory services. 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 co-operate with the Tower Hamlets Virtual School, which now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children known to a social worker.

At Stepney Park Primary School, the Designated Safeguarding Lead (DSL) is the main point of contact for social workers and the Tower Hamlets Virtual School, coordinating information sharing and support for children known to social care - this role may be delegated to a Deputy DSL with the DSL maintaining oversight. While information about a child's involvement with a social worker is shared with staff only on a need-to-know basis to protect confidentiality, all staff are expected to remain vigilant to any changes in the child's behaviour, attendance, or wellbeing and promptly report concerns to the DSL. Staff may also provide additional pastoral and academic support as needed, working sensitively and collaboratively to ensure these vulnerable pupils are safeguarded and supported effectively within the school community.

12.   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.[5] All staff need to recognise that mental health may be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should be aware of the trauma and mental health impact on a child who has had adverse childhood experiences

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[5] For further information staff should read relevant government guidance including *Promoting and supporting mental health and wellbeing in schools and colleges* (2022) and *Mental Health and Behaviour in Schools* (2018)

including abuse, bereavement and separation of parents. Staff should also be aware that the pandemic has had a negative impact on the mental health of many children, some of whom have never previously experienced difficulties with their mental health. However, all staff should be clear that only appropriately trained professionals should attempt to make a diagnosis of a mental health difficulty.

At Stepney Park Primary School, the Designated Safeguarding Lead (DSL) also serves as the Senior Mental Health Lead and is supported by members of the Senior Leadership Team to ensure mental health and wellbeing remain a strategic priority. All staff play a vital role in identifying signs that a child may be experiencing mental health difficulties, understanding that such issues can be linked to trauma, abuse, or other adverse experiences. When concerns arise, staff are expected to refer the child promptly to the Senior Mental Health Lead or DSL, who coordinates appropriate support within school. Our mental health support includes access to Emotional Literacy Support Assistants (ELSA), the school counsellor, and Educational Psychologists, alongside referrals to external services such as the Tower Hamlets Education Well-being Service and CAMHS when necessary. The school is committed to developing a whole-school approach to mental wellbeing, working collaboratively with these services to ensure that children receive timely, tailored support in a safe and nurturing environment.

13. LOOKED AFTER CHILDREN, PREVIOUSLY LOOKED AFTER CHILDREN & CHILDREN IN KINSHIP CARE ARRANGEMENTS

The most common reason for children becoming looked after by the Local Authority is as a result of abuse including neglect.

Staff need to have the skills, knowledge and understanding to safeguard Looked After Children and Previously Looked After Children in recognition of their heightened vulnerability.

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

At Stepney Park Primary School, the Designated Safeguarding Lead (DSL) also acts as the Designated Teacher for Looked After Children (LAC) and

Previously Looked After Children. The Designated Teacher works closely with the Tower Hamlets Virtual School Headteacher to ensure that the educational progress and wellbeing of these children are carefully monitored and supported. This includes regular meetings to review the child's Personal Education Plan (PEP), coordinating additional funding, and collaborating with social workers, carers, and other professionals to provide tailored support. The Designated Teacher also attends key meetings, such as Core Groups, to advocate for the child's needs. All staff have a responsibility to understand the heightened vulnerability of Looked After Children and Care Leavers and to support their safeguarding and educational achievement through vigilance, empathy, and inclusive classroom practice.

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.

The school 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.

14.   CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

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 disproportionally impacted by behaviours such as bullying (including prejudice-based bullying), without outwardly showing any signs

- children not understanding that what is happening to them is abuse; and

- communication barriers when reporting abuse and difficulties in overcoming these barriers.

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

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

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

At Stepney Park Primary School, we are committed to ensuring that all pupils with Special Educational Needs and Disabilities (SEND), including those with physical health conditions, are safeguarded effectively and supported in an accessible and inclusive environment. Staff receive tailored training focused on the specific needs and vulnerabilities of children with SEND, equipping them to recognise signs of abuse or neglect that may be masked by disability or communication difficulties. We maintain regular pupil progress and welfare meetings where class teachers collaborate with senior leaders and the SENDCo to identify concerns early and ensure appropriate interventions and referrals. Our safeguarding systems are designed to be accessible to all children, with additional support in place to overcome barriers related to communication, understanding, and digital safety. Staff are

vigilant to the increased risks faced by SEND pupils, including online vulnerabilities and peer-related harms such as bullying, and take proactive steps to create a safe and supportive environment where these pupils can thrive.

15.   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 statutory guidance *Working together to improve school attendance*, the school 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 school's early help response. Staff should be alert to children already known to be vulnerable especially Children known to a Social Worker and Looked After Children, since absence from education may increase known safeguarding risks within the family or in the community. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Stepney Park Primary School's policy, in relation to absences and attendance can be accessed on the school website - Attendance, Punctuality and Leave in Term Time Policy.

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

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.

16. ELECTIVE HOME EDUCATION

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

When a parent informs the headteacher of their intention to electively home educate their child, the school will convene and coordinate a meeting between the LA, relevant school staff, parents and all key professionals currently working with the child and family. In accordance with Keeping Children Safe in Education 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.

17. 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.

Stepney Park Primary School's Whistle Blowing policy is accessible on the school website.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, they should consider other channels available to employees as set out in Government's guidance on whistleblowing. To raise whistleblowing concerns externally school 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.

18.   REPORTING OF 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 be in line with KCSIE 2025 Part 4 and the THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – September 2025.

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.

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

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.

At Stepney Park Primary School, the Staff Code of Conduct Policy can be accessed from the Staff Drive.

[School to cross-reference to its Staff Code of Conduct which needs to have a section on Concerns that do not meet the Harm Threshold]

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.

19. STAFF SAFEGUARDING TRAINING INCLUDING TRAINING FOR GOVERNORS

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 are in place.

At Stepney Park Primary School, safeguarding training is a vital and ongoing part of staff and governor development. All staff, governors, volunteers, and agency workers complete compulsory safeguarding training as part of their induction, ensuring they understand their roles and responsibilities. This induction includes reading Keeping Children Safe in Education (KCSIE) 2025 Part 1, familiarisation with the school's Child Protection Policy, and completion of relevant online safeguarding training such as *The Key – Safeguarding Essentials*.

The Designated Safeguarding Lead (DSL) delivers regular refresher training, including morning briefings, scenario-based discussions, guest speaker sessions, and tailored training linked to specific pupils or concerns. Where staff are unable to attend scheduled sessions, training materials are made available via the school's shared drive, and the DSL offers one-to-one support to ensure understanding.

For governors, safeguarding training is provided through accredited online courses, supplemented by opportunities to meet with the DSL to discuss safeguarding procedures and school-specific risks. This dual approach empowers governors to provide informed strategic challenge and assurance regarding the effectiveness of the school's safeguarding arrangements.

20. VISITORS

At Stepney Park Primary School, we prioritise the safety and wellbeing of our pupils by maintaining strict safeguarding procedures for all visitors. Every visitor is required to follow the school's Visitors Policy, which may include completing a Visitor's Risk Assessment that records their details, purpose of visit, and any safeguarding checks undertaken, including verification of their Disclosure and Barring Service (DBS) status where applicable. When

necessary, visitors are accompanied by a member of staff while on site and are given clear guidance on the school's safeguarding expectations, including how to report any concerns. We reserve the right to refuse entry or remove any visitor whose behaviour is deemed inappropriate or poses a risk to children or staff.

When inviting external speakers or organisations, the school follows a clear protocol to ensure that their content aligns with our safeguarding values and curriculum aims. All external contributors are vetted in advance, and their sessions are supervised by school staff to safeguard pupils from unsuitable material or messaging.

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.

21.   ALTERNATIVE PROVISION PROVIDERS

When the school places a pupil with an alternative provision provider in the best interests of the child, the school 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 and the statutory guidance Arranging Alternative Provision, as a minimum, the school 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 school 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 school 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 school 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 school will also obtain written confirmation that the alternative provider will inform the school 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.

22.   EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

At Stepney Park Primary School, all extended school activities and off-site visits, including day trips, residential visits, and work-related experiences, are subject to thorough risk assessments to ensure the safety and wellbeing of all pupils. Overnight activities are recorded on the Evolve system, which replaces the standard off-site risk assessment for these events. There will always be a member of the Senior Leadership Team available throughout any overnight stay to provide additional oversight and support. Our Child Protection Policy and safeguarding procedures fully apply during any activity under the school's direct management and supervision, and staff are clear about their safeguarding responsibilities throughout the event.

When pupils attend activities or services provided by external organisations the school seeks clear assurance that these providers have effective safeguarding policies and procedures in place. Safeguarding expectations for such organisations are informed by the Department for Education's guidance on safeguarding during community activities, after-school clubs, and tuition (May 2025 update). All safeguarding requirements are clearly outlined in any lease or hire agreements with external providers using the school premises, with non-compliance leading to potential termination of access rights. Through these measures, the school maintains robust oversight and assurance that all children accessing activities connected to the school are safeguarded appropriately.

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 non-regulated external organisations 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). The school will ensure that all safeguarding requirements are set out clearly in the lease or hire agreement with the organisation, as a condition of use and occupation of the school premises; and that failure to comply would lead to the termination of the agreement.

23. 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 outside of the family home. Such extra familial harms include sexual exploitation, criminal exploitation, serious youth violence, and abuse that occurs on digital and online platforms. All staff especially the DSL and Deputy DSLs must consider whether children are at risk of harm and exploitation in environments outside the family home. All staff should therefore apply a Contextual Safeguarding approach when safeguarding pupils, which includes applying a Contextual Safeguarding approach in the school context.

24. 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 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 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 DSL is aware of the borough's LBTH Neglect Guidance toolkits and all school staff understand their important frontline role in identifying children who may be suffering from Neglect.

25.   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. Children need to be assured that their concerns will be taken seriously by staff and action will be taken to safeguard and protect them. It is also important that staff determine how best to build safe and trusted relationships with children and young people which facilitates communication and the sharing of concerns.

At Stepney Park Primary School, we are committed to ensuring that all children feel safe, heard, and empowered to speak up about any worries or concerns. In line with KCSIE 2025, we have a range of accessible and age-appropriate systems in place to facilitate this, ensuring that all pupils understand how to use them and that these are actively promoted throughout the school.

Through our PSHE curriculum, assemblies and other opportunistic moments, we use age-appropriate resources and activities to teach the children about their rights, personal safety, and who they can turn to if they are worried. We actively promote the concept of the Trusted Adult: all school staff are introduced to pupils as trusted adults, and we regularly reinforce that every adult in school is someone they can go to for help. We explain to children that their trusted adult may change as they move through the school or as relationships develop, but the principle remains the same — every adult at Stepney Park is there to listen and help.

For some children identified as more vulnerable, individualised support is provided through ELSA (Emotional Literacy Support Assistants), our school counsellor, and where needed, our Educational Psychologist. These relationships are carefully maintained to ensure a consistent and trusted presence.

We also gather feedback through Pupil Voice activities, including safeguarding-specific surveys.

26.   SAFEGUARDING ISSUES

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

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

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

- Children who are in possession of multiple phones and overly anxious to check their phones
- Children who experience sudden changes in behaviour e.g. looking agitated, children who want to leave the school premises at lunchtime
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant.
- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and

- children who regularly miss school or education or do not take part in education.

At Stepney Park Primary School, the risks associated with Child Sexual Exploitation (CSE) are addressed through our PSHE and RSE curriculum in an age-appropriate and sensitive manner. Children are taught about personal safety, privacy, consent, and healthy relationships, helping them to understand appropriate and inappropriate behaviour from others. We use the NSPCC PANTS rule to introduce the concept of body autonomy and physical boundaries, with lessons delivered at the start of each academic year and reinforced through RSE sessions, assemblies, and informal discussions when appropriate. This education empowers pupils to recognise risky or exploitative situations and equips them with the language and confidence to speak to a trusted adult. Lessons are adapted where needed to ensure accessibility for all pupils, including those with SEND and EAL.

For further information staff can read the [Home Office Statutory Guidance](#) on Child Sexual Exploitation as well as speaking to the DSL. The Children's Society has provided useful guidance on Child Sexual Exploitation.

28. CHILD CRIMINAL EXPLOITATION INCLUDING COUNTY LINES

Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country through County Lines, forced to shoplift or pickpocket, or to threaten other young people. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves,

their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to

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

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

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

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.
Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

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

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals. 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 school will give consideration to completing an Exploitation Screening Tool to support the Local Authority's assessment of risk to the child.

29.   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.

30.   ONLINE HARMS

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

that facilitates harm, and the use of technology has become a significant component of many safeguarding issues. Examples of which include child sexual exploitation; child criminal exploitation; radicalisation; sexual predation/grooming; and forms of child-on-child abuse such as cyberbullying and nudes and semi-nudes. The Online Safety Act 2023 among other things makes cyberflashing, threatening communications and the promotion of self-harm criminal offences. 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 especially girls.

In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, which can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In accordance with Behaviour in Schools. Advice for headteachers and school staff (September 2022), the school promotes as part of its culture of excellent standards of behaviour that the same standards of behaviour are expected online as apply offline, and that every pupil should be treated with kindness, respect and dignity.

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

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

- Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racism, prejudice-based content, misogyny, misinformation, disinformation, conspiracies, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- Contact: being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention of grooming or exploiting them for sexual, criminal; financial or other purposes;
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (e.g. consensual or non-consensual sharing of nudes and

semi-nudes), and/or pornography, sharing other explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. When pupils are at risk of phishing, school can reports concerns to the Anti-Phishing Working Group (https://apwg.org/).

School is committed to reviewing and implementing its Online Safety Risk Assessment to keep staff and pupils safe when using technology including the use of Artificial Intelligence.

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

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

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

- identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- 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.

Stepney Park Primary School uses HomeProtect (via LGfL) to filter internet access on all school devices, both in school and off-site. Filtering is managed through WebScreen using allow/deny lists to block harmful, sexualised, or extremist content. The effectiveness of the filter is tested half-termly using testfiltering.com, and weekly reports show any attempted access to blocked sites.

SENSO, our monitoring system, is active on all pupil devices and accounts (PCs, iPads, Chromebooks) and alerts senior leaders to concerning

keystrokes or behaviour. The safeguarding and computing leads also review browsing history regularly to detect any patterns of concern.

All devices are protected with Sophos Intercept X and ThreatDown (Malwarebytes) for virus and malware protection. Google for Education ensures secure email and data encryption. Each user has individual logins, and the IT team is alerted to suspicious login attempts.

For remote learning, HomeProtect filtering and SENSO monitoring remain in place when children use school devices or school-linked Google accounts at home. Staff follow safe remote learning protocols to ensure all interactions are appropriate and secure.

Online safety is taught regularly through Computing, PSHE, and responsive, 'in the moment' teaching. Parents are supported through workshops and guidance on keeping children safe online.

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.

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.

For further information, refer to:
- Internet, E Safety and Social Media Policy (school website)
- Behaviour and Anti-Bullying Policy (school website)
- Staff Code of Conduct Policy (staff Drive)

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

Staff should report Online Safety concerns about pupils to the Designated Safeguarding Lead as with all other safeguarding concerns. When it comes to the safety and well-being of the child, the response to the risks and harms that children may experience in the online or digital environment should be

no different than the offline, face to face world. For most children there is little distinction between the online and face to face interactions as the two environments often intersect with one another in their daily lives. Staff should recognise that children's experience of abuse in the digital environment may be even more pronounced, where the identity of the abuser is unknown and the abuse can continue 24 hours a day, 7 days a week.

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

31. DOMESTIC ABUSE

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

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

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

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

32. SO-CALLED HONOUR-BASED ABUSE

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of 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.

Female Genital Mutilation

In England, Wales and Northern Ireland, FGM is a criminal offence under the Female Genital Mutilation Act 2003. Refer to: HM Government Multi-Agency Statutory Guidance on 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.

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 fmu@fcdo.gov.uk.

Refer to: Forced Marriage Unit's Statutory Guidance and Multi Agency Guidelines The Right to Choose Updated April 2023]

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).

33. RADICALISATION AND EXTREMISM

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

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

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

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

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

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

At Stepney Park Primary School, we regularly complete and review our Prevent Risk Assessment and Prevent Checklists in line with our responsibilities under the Prevent Duty, as outlined in the *Statutory guidance on the Prevent duty 2023 (updated March 2024)* and *The Prevent duty:*

safeguarding learners vulnerable to radicalisation (DfE, 2022). These documents help us identify and mitigate any risks related to radicalisation or extremism within our school context.

As part of our whole-school safeguarding approach, all staff receive regular training to ensure they can recognise signs of radicalisation and know how to respond appropriately. In addition, our Religious Education, PSHEE curriculum, and assembly programme provide structured opportunities for pupils to explore and discuss issues related to religion, ethnicity, culture, and identity. These are key components of our spiritual, moral, social and cultural (SMSC) education and serve as an effective means to promote fundamental British Values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

In LBTH the Prevent Education Officer is Iona Karrman-Bailey: Iona.Karrman-Bailey@towerhamlets.gov.uk

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

34. CHILD-ON-CHILD ABUSE

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

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

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

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

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse such as biting, hitting, kicking or hair pulling
- sexually harmful behaviour and sexual abuse including inappropriate sexual language, touching, sexual assault or rape
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos
- teenage relationship abuse – where there is a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- upskirting – taking a picture under a person's clothing without their knowledge and/or permission with the 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.

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. In the support that is provided to children questioning their gender, the school will adhere to any specific guidance issued by the Department for Education.

At Stepney Park Primary School, we recognise that children can be vulnerable to abuse by their peers. Child-on-child abuse can occur both in and outside of school, including online, and may happen even when not reported. Staff are trained to recognise the signs of all forms of child-on-child abuse and understand the importance of treating all concerns seriously. Abuse is never dismissed as "banter" or "part of growing up" and we adopt a Zero Tolerance Approach to all forms of abuse. All staff understand that such abuse is a violation of a child's rights and must be addressed promptly and appropriately.

In accordance with KCSIE 2025 Part 2, Stepney Park Primary School has clear procedures in place to minimise the risk of child-on-child abuse. These include:

- A strong school ethos based on our value of 'respect', embedded through our learning behaviours, particularly 'empathy' and 'responsibility'.
- A bespoke PSHEE curriculum that places emphasis on equality, friendships, healthy relationships, and understanding personal boundaries.
- Promotion of the NSPCC PANTS Rule to teach children about body privacy and safety.
- Regular lessons and assemblies on identifying and reporting concerns, including how to identify a trusted adult.
- A proactive behaviour monitoring system: All staff are expected to record Level 2 behaviours, which are reviewed by senior leaders and discussed at 'vulnerable children' meetings, ensuring early intervention and support.
- Guidance and support from Tower Hamlets MAST line may be sought where appropriate.

As required by KCSIE 2025 Part 2, all incidents of child-on-child abuse will be recorded on CPOMS, the school's secure safeguarding platform. Where an incident is assessed as child-on-child abuse, the Designated Safeguarding Lead (DSL) will take a lead role in:

- Investigating the concern
- Gathering and recording all relevant information
- Informing parents or carers as appropriate
- Referring to Tower Hamlets Children's Services when necessary
- Ensuring that the school follows statutory guidance and best practice in handling such cases

Stepney Park Primary School is committed to supporting all children affected by child-on-child abuse – including victims, alleged perpetrators, and other children impacted. Support may include:

- Risk assessments and safety planning, when appropriate
- Pastoral support from trained staff such as Assistant Headteachers, ELSAs (Emotional Literacy Support Assistants), or the school counsellor
- Educational Psychologist input or referral to CAMHS where appropriate
- Restorative conversations or structured interventions to repair relationships
- Close monitoring of individuals through safeguarding meetings and regular reviews
- Engagement with parents or carers to ensure a joined-up approach to support
- Providing safe spaces for children who may feel vulnerable, including those identifying as or perceived to be LGBTQ+
- Ensuring an inclusive and respectful school culture where all children feel valued, listened to and safe

Where a child is questioning their gender identity, the school will follow any guidance issued by the Department for Education and ensure support is provided sensitively and in line with statutory requirements.

35. 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 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 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.

In response to reports of child-on-child abuse 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 will 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 the 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) 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, 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:

- 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 school will make a referral to Children's Social Care via the Multi Agency Support Team.

Sexual Harassment

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:

- o sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- o sexual "jokes" or taunting;
- o 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
- o 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, coercion and threats

On a case-by-case basis the school will liaise with Children's Social Care 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 Social Care, the Police and other specialist services.

At Stepney Park Primary School, all reports of **child-on-child sexual violence and sexual harassment** are taken extremely seriously and managed in line with *Keeping Children Safe in Education (KCSIE) 2025 Part 5*. When such incidents occur, the **Designated Safeguarding Lead (DSL)** leads the investigation and all subsequent actions, ensuring that every step — from the initial disclosure to the provision of ongoing support — is fully recorded on **CPOMS**.

At the appropriate stage, **written risk assessments** are created by the DSL and shared with relevant staff to safeguard and support the **victim**, the **alleged perpetrator**, and any other pupils affected. These risk assessments are tailored to individual circumstances and are regularly reviewed and updated as situations evolve.

Throughout the process, the school ensures that the **victim is listened to, supported, and never made to feel ashamed or blamed**. Children are reassured that the law is there to protect them, not to criminalise them. The school is equally committed to offering appropriate support to the **alleged perpetrator**, recognising that all children involved may have unmet needs or vulnerabilities.

Support for any child involved may be provided by the **DSL**, an **Assistant Headteacher**, **ELSA-trained staff**, the **school counsellor**, or through referrals to external services such as the **Educational Psychologist** or **CAMHS**. Where necessary, the school will liaise with **Children's Social Care**, the **Police**, and other specialist agencies to ensure that the response is comprehensive and child-centred.

The school also uses appropriate frameworks, such as the **AIM Checklist**, to assess and respond to incidents of **harmful sexual behaviour**. All actions taken are proportionate, trauma-informed, and focused on the **safety, dignity, and wellbeing** of every child involved.

To support its overall prevention of and response to harmful sexual behaviours the school will give consideration to the best practice resources such as that available through the <u>Contextual Safeguarding Program</u> in particular the <u>Beyond Referrals Toolkit: Harmful Sexual Behaviours</u>

36.   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 children 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 reports of Youth Produced Sexual Imagery, **staff must be aware that it is illegal for staff to view or share such imagery**. Staff should immediately inform the Designated Safeguarding Lead who will act in accordance with KCSIE 2025 and non-statutory guidance, [Sharing Nudes and Semi-Nudes. Advice for Education Settings working with Children and Young People](#) (Updated March 2024).

At Stepney Park Primary School, any report of youth produced sexual imagery is referred immediately to the Designated Safeguarding Lead (DSL). Staff must not view, copy, share, or store any such images; if this happens accidentally, the DSL must be informed. The DSL will respond using a child-centred approach, speaking only to the children involved with sensitivity, ensuring they are not blamed or shamed, and offering appropriate

wellbeing and pastoral support within school or referral to external agencies as needed.

The DSL will follow UKCIS guidance and seek advice from Tower Hamlets Children's Social Care or other relevant agencies where necessary. Information will only be shared with consent or when required to protect the children's safety and welfare.

37.   BULLYING (INCLUDING CYBERBULLYING)

Bullying is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the school's Anti-Bullying Policy/Pupil Behaviour Policy/Child-on-child abuse Policy, in accordance with Keeping Children Safe in Education 2025 and Behaviour in Schools. Advice for Head teacher and School Staff (September 2022).

At Stepney Park Primary School, all incidents of bullying and cyberbullying are taken very seriously and addressed promptly in line with our commitment to maintaining a safe and respectful environment. Staff follow the procedures outlined in our Behaviour and Anti-Bullying Policy, which sets clear expectations for preventing, identifying, and responding to bullying in all its forms. This policy is available to view on the school website for further detail.

38.   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. However, it is also recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for

example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and should be contacted in the first instance. For general enquiries about support for young people who might be at risk of or experiencing homelessness in the borough, please contact Tower Hamlets Housing Options: Host@towerhamlets.gov.uk

39.   CHILDREN AND THE COURT SYSTEM

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

The DSL will ensure that the children concerned are supported and where appropriate make use of the guides provided by the HM Courts & Tribunals Service for children 5-11-year olds and 12-17 year olds.

Making child arrangements via the family courts following parental separation can be stressful and entrench conflict in families. This can be stressful for children too. Where appropriate parents can be signposted to the Department of Justice's information toolkit for families on making child arrangements which sets out each party's responsibility including the importance of putting the needs of the children first in the process.

40.   CHILDREN WITH FAMILY MEMBERS IN PRISON

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

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

41.   PRIVATE FOSTERING

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and

accommodating them has done so for less than 28 days and does not intend to do so for longer.

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

42. 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 condition
- a mental health condition

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

It is estimated by the Children's Society that 1 in 5 children are young carers and many are hidden and unidentified.

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 school 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 school 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 School: 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 school 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.

School 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 school thinks that the child or young person or a member of their family requires more support than the school 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. Schools should complete the Tower Hamlets Young Carers Identification Form and attach it to the MAST referral form that is sent.

43.   CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. 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.

44.   MODERN SLAVERY

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including:

sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

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

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

45. TAKING SAFEGUARDING ACTION

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here". Key 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 - safeguarding is always the priority - staff members must verbally contact a safeguarding officer immediately if there is reason for concern
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern on CPOMS, at a minimum, this should be completed before the end of the day to avoid forgetting details.
- seek support for yourself if you are distressed.

46. 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 need to recognise that all children may benefit from Early Help at any point in their childhood, but some children may benefit from Early Help

more than others. These are children with known vulnerabilities, which are listed on page 9 of this policy.

At Stepney Park Primary School, our Pastoral Care Team works closely with the Designated Safeguarding Lead (DSL) to identify and support children who may benefit from Early Help. Early Help is provided as soon as a concern arises and can include internal pastoral support, additional targeted interventions, and involvement of external agencies. Where appropriate, Early Help Assessments (EHAs) are completed to understand the child and family's needs, with regular EHA reviews and Team Around the Family meetings coordinated by the school to ensure a multi-agency approach.

The DSL uses the Tower Hamlets Safeguarding Children Partnership (THSCP) Levels of Need Guidance to determine the appropriate level of support and will contact the Local Authority's Multi Agency Support Team (MAST) for advice when necessary. Referrals to Children's Social Care are made if the child's needs meet the statutory threshold or if Early Help interventions are not leading to improved outcomes. The school also utilises the borough's Social Inclusion Panel to support coordinated plans aimed at improving children's wellbeing, embedding the Think Family approach as a core part of our practice.

The DSL will contact the LBTH MAST for support and advice if required:
020 7364 5006 (Option 3) 020 7364 3444/5601/5606/5358/7796

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

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

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

Child Protection Advice Line
020 7364 3444

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

47. HANDLING THE REPORTING OR SHARING OF CONCERNS

At Stepney Park Primary School, all staff understand that they have a safeguarding duty and must act immediately when a child shares a concern or discloses abuse. Staff are encouraged to report any concern — even if they are unsure — using CPOMS, so that a Designated Safeguarding Lead (DSL) can assess the information and decide on the appropriate course of action. If a child is believed to be at risk, the DSL must be informed in person as soon as possible, and the CPOMS entry should be completed by the end of the same working day. A DSL is always available to discuss concerns with staff.

All staff are expected to follow clear, sensitive and supportive steps when a child shares a concern. This includes listening calmly, allowing the child to speak freely and without interruption, avoiding leading questions, and reassuring the child that they will be supported and kept safe. Staff must not promise confidentiality, as concerns may need to be shared with other professionals in the child's best interests. Staff are also reminded to seek support from a line manager or DSL if they feel distressed after receiving a disclosure.

When a child shares that they have been or are being abused including exploitation and neglect, they may feel ashamed, especially if the abuse is sexual, and may feel frightened lest their abuser finds out they have sought help and support from a professional. The child may have been threatened and may have lost all trust in adults; or they may believe that they are to blame for the abuse. Sometimes the child may not understand that what is happening is abusive.

All staff should reassure children that what they are sharing is being taken seriously and that they will be supported and kept safe. A child should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a child 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
- refrain from asking leading questions
- tell the pupil what will happen next
- inform the DSL as soon as possible
- seek support from their line manager if they feel distressed.

At Stepney Park Primary School, the Designated Safeguarding Lead (DSL) will decide when and how to inform parents or carers about a safeguarding concern, taking into account the child's safety and wellbeing. In some cases, the DSL may seek advice from Tower Hamlets Children's Services before notifying parents — particularly where doing so may place the child at further risk, compromise an investigation, or where there are concerns about possible reactions at home. In such circumstances, the school may delay informing parents until advised it is safe and appropriate to do so.

48. CONFIDENTIALITY AND INFORMATION SHARING

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

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

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

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

Staff will have due regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR) to ensure that personal information is processed fairly and lawfully and they will adhere to the seven golden rules

for sharing information. Information sharing will take place in a timely and secure manner.

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

Where possible, Stepney Park Primary School will seek consent from parents or carers before sharing safeguarding information with other professionals. However, there are circumstances where gaining consent may not be appropriate — for example, if doing so would place a child at further risk of harm, prejudice an investigation, or where the child or family cannot be contacted in a timely way. In such cases, the DSL will use professional judgement to decide whether information should be shared without consent, in line with statutory safeguarding guidance. All decisions about consent and information sharing will be clearly recorded.

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.

49.   REFERRING TO CHILDREN'S SOCIAL CARE

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

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

Child Protection Advice Line:
020 7364 3444

The DSL will contact CPAL/MAST in the first instance to seek advice and guidance. When the DSL completes a MAST Request for Support form (appendix 2) and sends it securely to the Multi-Agency Support Team, the referral form will be accurate and sufficiently detailed to enable the MAST to make a decision on the level of response required in accordance with the THSCP Levels of Need Guidance.

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

For an overview of how safeguarding concerns are reported, recorded and escalated within the school, please refer to the flowchart in Appendix 3, which outlines Stepney Park Primary School's safeguarding procedures.

a. ESCALATION PROCEDURES

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

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

Appendix 1: MAST Poster

Multi-Agency Support Team (MAST)
020 7364 3444 / 5601 / 5606 / 5358 / 7796 /
3342 / 7828 / 6469 / 3181

If there is a concern about the welfare of a child or young person and you would like to talk it through then you should contact the Tower Hamlets Children Services' Multi-Agency Support Team (MAST).

The Duty Officer will be able to discuss the concern, assist in deciding whether a referral is appropriate and facilitate the reporting of a referral in accordance with Tower Hamlets Safeguarding Children Partnership (THSCP) Procedures and to offer advice.

When there is a specific concern of a child protection nature whereby it is thought that a child has been harmed or at risk of being harmed then the MAST should then be contacted on 0207 364 3444 / 5601 / 5606 / 5358 / 7796 / 3342 / 7828 / 6469 / 3181 in the first instance to discuss the matter followed by the completion of the LBTH MAST Request for Support Form to MAST@towerhamlets.gov.uk.

The MAST operates between 9.00am and 5.00pm except at weekends and on public holidays. If the concern arises outside of the hours operated by the MAST and it is believed the child may be at immediate risk the Children's Social Care Emergency Out of Hours Duty Team or the Police should be contacted without delay.

Important contact information:

The Multi Agency Support Team (MAST) Note – information should only be emailed following prior discussion with the Duty Officer.	MAST@towerhamlets.gov.uk.
Children's Social Care Emergency Out of Hours Duty Team (5.00pm onwards and weekends)	020 7364 4079

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Appendix 2: [MAST Request for Support Form](#)

https://www.towerhamlets.gov.uk/lgnl/health__social_care/children_and_family_care/
Multi-Agency-Support-Team-MAST.aspx

Appendix 3: Safeguarding Procedure Flowchart Poster

Stepney Park Primary School

Safeguarding Procedure

David Smith
Designated
Safeguarding Lead
(DSL)
Ext. 206

Khaleda Begum
Deputy DSL
Ext. 307

If neither David or Khaleda are available, speak to any SLT member for advice.

Have a disclosure or a concern?

Regarding a member of staff

Concerns should be reported immediately to the headteacher.

If the allegation is against the headteacher, the chair of governors should be informed.

If the concern cannot be discussed with the headteacher or chair of governors, then contact the Local Authority Designated Officer (LADO) on 0207 3643 506.

Regarding a child

If urgent (e.g. a child is at risk of harm) report it verbally to a DSL as soon as possible - safeguarding is the priority.

If not urgent, record on CPOMS at the earliest convenient time (the same day) and alert David, Khaleda and the appropriate assistant headteacher.

If a named DSL is not available, then report the issue to any other SLT member for advice.

Should none of the above staff members be available, then contact Tower Hamlets Child Protection Advice Line on 0207 364 3444. Or, if appropriate, call the police.

Our Safeguarding Duty

It is the responsibility of all staff to promote and ensure the wellbeing and safeguarding of our children. If a child does share concerns we will:
- ❏ **Listen**, be supportive and take them seriously
- ❏ **Reassure** the child that they have done the right thing
- ❏ **Let the child lead** and be asked open questions
- ❏ **Be honest** about what you'll do next

Recording Concerns on CPOMS

Staff must, as soon as reasonably possible (the same day as a minimum) complete an incident report on CPOMS.

Detailed, factual records must be added and categorised as appropriate.

Alert David, Khaleda and the appropriate assistant headteacher.

Appendix 4: Touch Protocol

There are occasions when physical contact with a pupil is proper and necessary. Extensive neurobiological research shows that appropriate touch makes a positive contribution to brain development, emotional regulation, mental health and the development of social skills.

Physical contact should always be brief and about meeting the age or developmentally appropriate needs of the child, so staff should always think before making any physical contact. They should be clear about why their actions are in the best interest of the child concerned, including the child's personal response to touch.

Our policy rests on the belief that every member of staff needs to know the difference between appropriate and inappropriate touch. Hence, staff need to demonstrate a clear understanding of the difference.

This protocol should be read in conjunction with school policies relating to interaction between adults and pupils, specifically the school's **Positive Handling Policy**, **Behaviour Policy**, **Child Protection Policy** and the **Code of Conduct for Staff**.

Appropriate Touch

Examples of where touching a pupil might be proper or necessary:
- To calm, comfort or reassure a child (Please refer to the relevant guidance below)
- To prevent an accident, protect someone or protect school property (Please refer to the relevant guidance below)
- To support a child who has an EHCP and who has an agreed Individual Touch Plan
- To join in with pupils' age appropriate and child initiated games like 'it' or 'rock/paper/scissors' or clapping games
- To congratulate or praise a child (e.g. shaking hands, a high five/fist bump)
- To demonstrate:
  - the correct use of school equipment, such as a musical or technical instrument or cutlery (use careful, unforced movement of hand or fingers alongside clear verbal instructions - ask for permission first - 'Can I show you?')
  - correct techniques during PE or swimming, for example when supporting a child to roll, climb or balance (Touch in these instances should be used alongside clear verbal instructions, staff should ask for permission first - 'To help I will need to take your hand. Is that ok?')
- To support a younger child to dress or undress for PE (but only if the child would inappropriately struggle without the support)

- To support a child with toileting or to change nappies. Please follow the school Risk Assessment around Toileting and Changing Nappies in the[Whole School Risk assessments](#) document)
- To give first aid where touch is required.

Calming, comforting or reassuring a child:
Before using touch, staff need to consider using other methods, including:
- Slowing down the pace
- Lowering the voice
- Breathing more deeply
- Talking slowly, firmly and quietly in an unhurried, unflustered way
- Providing clear, predictable, consistently held boundaries.
- Offering choices
- Distraction /positive redirection

If these methods do not help, then the following appropriate use of touch can calm, soothe and regulate a child's emotions:
- A reassuring pat on the arm
- Stroking a child's head, back or an arm
- Putting an arm around a child's shoulders
- Taking a child by the hand
- A brief hug
- Allowing an EYFS child to sit on an adult's lap for a very limited period of time (when initiated by the child)

Prevention of an accident, protecting someone or protecting school property:
Situations in which appropriate touch may be considered include:
- The child is incensed and out of control
- There is an immediate danger or safety concern
- Verbal attempts to engage the child have failed

Appropriate types of touch in preventing accidents, protecting someone or protect school property**:**
- Holding a child's hand (e.g on a trip or whilst moving around school)
- Physically interposing between pupils
- Blocking a pupils' path
- Leading a pupil
- In extreme circumstances
  - Holding a pupil
  - Carrying a pupil

Further guidance can be found in the Positive Handling Policy. A child who requires touch to prevent harm to themselves or others generally would have an Individual

Behaviour Action Plan, which would refer to situations which are likely to escalate and would identify actions to be taken to prevent this.

Recording:
- Most instances of touch which were used to prevent accidents, to protect someone or to protect school property need to be recorded on a proforma which can be found in the **Positive Handling Policy - Appendix B,**
- The completed form should then be saved on CPOMS, and a senior member of staff needs to be made aware
- A senior member of staff will normally contact the parents and inform them that an incident has occurred
.

Supporting children who have an EHCP
Some (but not all) children with an EHCP and who have special, additional, sensory or medical needs, such as the children in Forest Class, may need an adult to handle or touch them for a variety of different reasons. Due to their communication needs, children who fall into this group may not always be able to respond to verbal instructions.

The reasons for appropriate touch may include:
- To keep the child safe,
- To keep others safe
- A specific way or strategy to help the child calm down and regulate
- To clean the child, to support the child with toileting, to change the child's nappy or to change the child's clothes
- To meet a child's sensory needs such as TAC / PAC
- A form of specialised communication such as intensive interaction

Individual Touch Plans
For children likely to need more use of touch, an Individual Touch Plan (see proforma below) should be completed.

Individual Touch Plans should:
- Be personalised for an individual child, written for their specific needs, based on knowledge we have about the child and taking into account the advice from experts
- Based on the principle which follows the least 'amount of touch needed'.
- Always have child safety as the highest priority
- Be agreed with the SENDcos and where appropriate, other professionals
- Be agreed and signed by the parents.
- Should be regularly (but at least annually) reviewed
- Should describe:
  - What situations and/ or teaching activities are likely to require touch
  - What appropriate touch types are acceptable

- ○ Where applicable:
  - ■ What the triggers might be that necessitate touch
  - ■ How touch can be minimised
- Be saved on CPOMs and Edukey
- Be shared with all relevant adults, including support staff.

Inappropriate Touch

Touch should never be:
- Longer than necessary in order to meet the child's needs
- To redirect a child because they are off task
- Impulsive or ill-thought out
- A punishment
- Aggressive (e.g. grabbing, pushing, striking, or pulling)
- To satisfy the staff member's own need for physical contact or reassurance.
- Experienced as invasive, confusing, traumatising or potentially erotic.
- Of a sexual nature for adult gratification.

Safeguarding:

- All staff, including staff working with relevant children with EHCPs will be provided with training and support.
- Staff need to be vigilant and follow our low level concerns reporting protocol
- All injuries resulting from touch need to be reported as follows:
  - ○ An injury received by a staff member as a result of contact with a child needs to be reported on CPOMS. Appropriate support needs to be offered by a senior member of staff.
  - ○ An injury received by a child as a result from an interaction with a staff member needs to be reported to the Headteacher and must be reported to the parents.

Staff Code of Conduct

- Staff should self-report or report others who use touch inappropriately, following the disclosure reporting procedures.
- Allegations of inappropriate touch will be investigated and appropriate actions will be taken.
- The staff Code of Conduct and Disciplinary Policy can be found on the Staff Drive.

Pro forma Individual Touch Plan

Individual Touch Plan for	
DOB	

Photo Here

Date of last review *This ITP needs to be reviewed at least annually*	
Parental Consent *Consent needs to be gained at the time of writing this plan and after any changes*	**I confirm that I agree to my child's individual touch plan**
	Name:
	Signature:
	Date:
Signature SENDco *I can confirm that this ITP will be shared with all relevant staff and that support will be given*	Name:
	Signature:
	Date:

What are the child's likely triggers and reasons that might necessitate touch?	
To support routines: ● example ● example **For emotional regulation:** ● example ● example **To keep safe:** ● example ● example **For communication & interaction:** ● example ● example **For toileting and changing:** ● example	

How can the need for touch be minimised?

Situations and teaching activities which are likely to require touch	**Appropriate touch**
	●