



St. Luke's Safeguarding and Child Protection Policy

From September 2024

Next review: Sept 2025

Scope of Policy:

This policy applies to all staff, pupils and volunteers at St Luke's Primary School

Contents	Page
Introduction	4
Ethos and Environment	4
CP & Other relevant policies	5
School commitment and aims	6
Core safeguarding principles	7
Purpose of policy	7
Safeguarding Legislation and Guidance	7
THSCP Supplementary Safeguarding Guidance.	8
Tower Hamlets Safeguarding Children Partnership	8
Key Definitions	9
Safeguarding: Roles and Responsibilities	
Roles and responsibilities	9
The DSLs	10
The Safeguarding Team	11
The Headteacher	11
The Governing Body	12
Child Protection files.	12
Rights of the child	13
Children who are potentially more vulnerable to risk of harm	
Children more vulnerable to risk of harm.	14
Children in need of a social worker	15
Children requiring mental health support	15
Looked After Children & Previously Looked After Children	16
Children with Special Educational Needs and Disabilities	16
Children Absent from Education and Children Missing Education	17
Elective Home Education	18
Staffing and issues associated with staff.	
Whistle Blowing	19
Allegations Against Staff	19
Staff Training	21
Safer Recruitment and Selection of Staff	21
Visitors	22
Extended School and Off-Site Arrangements.	22
Issues related to online and digital safety	
Staff/Children Online Relationships	24
Use of mobile phones	24
Use of cameras: photography and images	24
Recognising abuse	
Identifying Abuse	25
Indicators of Abuse	25
The Voice of the Child	26
Specific safeguarding issues	
Child Criminal Exploitation (Including County Lines)	27
Serious Youth Violence	30
Online Harms	30
Domestic Abuse	32
So-Called Honour-Based Abuse	33
Female Genital Mutilation	33
Forced marriage	34
Virginity Testing and Hymenoplasty	34
Radicalisation and Extremism	35
Prevent	32
Child on Child Abuse	36
Child on Child Sexual Violence & Sexual Harassment	38
Sexual Harassment	39
Serious Violence	36
Harmful Sexual Behaviours	40
Youth Produced Sexual Imagery.	40
Bullying including Cyber Bullying	42

Homelessness	42
Children and the Court System	42
Children with Family Members in Prison	41
Private Fostering	43
Young Carers	43
Child Abduction and Community Safety Incidents	43
Modern Day Slavery	44
Safeguarding action and procedures.	
Taking Safeguarding Action.	44
Early Help	44
Handling the reporting or sharing of concerns	46
Confidentiality and Sharing Information	46
Referring to Children's Social Care	48
Escalation Procedures	49
Appendices	
Appendix 1: Safeguarding Procedure for Staff	50
Appendix 2: Referral Route for Safeguarding Concerns	51
Appendix 3: Prevent Referral Route	52
Appendix 4: MAST poster	53
Appendix 5: LADO contact information	55
Appendix 6: School record of concern form	56
Appendix 7: MAST Request for Support Form	Follow hyperlink

Introduction

At St. Luke's our motto is: '**Hearts overflowing with truth and love**'. This motto is in full effect as we seek to support and protect every child entrusted into our care.

Action taken to promote the welfare of children and protect them from harm is everyone's responsibility. '**Everyone** who comes into contact with children and families has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests** of the child.' *Keeping Children safe in Education, September 2020.*

St. Luke's is a vibrant school that serves a diverse population including all religions, faiths, cultures, family models and backgrounds. Staff working in our school cannot make assumptions based on their own experience of life to date. They must maintain an open mind whilst being vigilant to what is in the best interests of the child, and they must maintain an attitude of '**it could happen here**' where safeguarding is concerned.

At St. Luke's we recognise that no single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy has been developed to ensure that all adults in St Luke's School are working together to safeguard and promote the welfare of pupils. It describes the management systems and arrangements in place to create and maintain a safe learning environment for all St Luke's Primary School pupils and staff. It identifies actions that should be taken to address any concerns about pupil welfare.

The Headteacher or, in their absence, the member of staff deputising for them, has the ultimate responsibility for safeguarding and promoting the welfare of pupils.

Safeguarding and promoting the welfare of pupils goes beyond implementing basic child protection procedures. It is an integral part of all the activities and functions of St Luke's Primary School. Under the Education Act 2002 schools have a duty to safeguard and promote the welfare of their pupils. Procedures within the Safeguarding and Child Protection policy apply to all staff, including agency, volunteers and governors and have been written in accordance with guidance set out in:

- Keeping children safe in education, September 2024
- Tower Hamlets Safeguarding Children Partnership supplementary guidance (THSCP), 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.

Ethos and environment

At St Luke's we have a clear set of values that describe the virtues that we hope all children and adults involved in the school community will observe. These include partnership, safety, kindness, respect and honesty. In implementing these we strive to create and maintain a safe learning environment where all pupils and adults feel safe, secure and valued and know they will be listened to and taken seriously. The school implements policies, practices and procedures which promote safeguarding and the emotional and physical well being of pupils and staff.

The London Borough of Tower Hamlets Early Help Strategy, continuum of need and thresholds guidance, Education Health and Care Plans (EHC) and the Early Help Assessment (EHA) are embedded into everyday practice and procedures when responding to pupils' needs.

Pupils have access to appropriate curriculum opportunities, including emotional health and well being, to support the development of the skills needed to help them stay safe and healthy, develop their self-esteem and understand the responsibilities of adult life, particularly in regard to child care and parenting skills.

At St Luke's we recognise our place in supporting, through education, the London Borough of Tower Hamlet's commitment to being an anti-racist borough. School is aware that children from ethnically diverse groups can be at risk of adultification, whereby their vulnerability as a child may be minimised due to racial

bias and stereotypes impacting professional judgement. All staff are committed to ensuring that 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.

Safeguarding and Child Protection Policy

St Luke's Safeguarding and Child Protection Policy can be found on the school's website: <https://www.st-lukes.towerhamlets.sch.uk/> so that all stakeholders involved in the school, whether staff, governors or parents, can access it and familiarise themselves with it.

For staff it is also saved on One Drive in All staff: Documents: Safeguarding 2024
25. Any issues please ask Cristina King, who will help you to locate a copy.

Other relevant policies

The Governing Body's responsibility for safeguarding the welfare of children goes beyond pure child protection. This policy therefore complements and supports a range of other policies, procedures and curriculum initiatives including:

- Acceptable Use and Internet Safety
- Anti-bullying
- Attendance
- Behaviour
- Code of Conduct
- Complaints procedure
- Confidentiality
- Covid19 School closure arrangements
- Equal Opportunities
- First Aid and the Administration of Medicines
- Health and Safety
- Looked After Children Policy
- Managing allegations against staff
- Offsite Trips and Visits
- PSHCE: Personnel, Social, Health and Citizenship Education
- Physical Intervention
- Safer Recruitment
- Relationships and Sex Education
- Single Central Record
- Special Educational Needs
- Whistle Blowing

Most of these can be found on the school's website:

<https://www.stlukes.towerhamlets.sch.uk/>

Unless they only apply to staff in which case that can be found in the policies folder on the 'All staff' shared One Drive as detailed above.

Safeguarding policies will be reviewed annually by the Safeguarding Leads, Head Teacher and Governing Body, unless new legislation or guidance calls for an immediate need to review in between times.

School commitment to safeguarding and aims

At St Luke's Primary School, we are committed to ensuring that appropriate procedures are in place for responding to situations in which we believe that a child has been harmed/abused or is at risk of harm/abuse, including procedures to cover circumstances in which a member of staff is accused of, or suspected of, causing harm/abuse. This includes:

- Maintaining children's welfare as a paramount concern – at all times we consider what is in the child's best interests;
- Providing an environment in which children feel safe, secure, valued and respected, confident to talk openly and sure that they will be listened to;
- Providing suitable support and guidance so that pupils know how to approach adults if they are experiencing difficulties or are worried;
- Including opportunities in the PSHE curriculum for children to develop the skills they need to recognise, and stay safe from, abuse;
- Raising the awareness of all teaching, non-teaching staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse;
- Ensuring all staff are able to recognise, and are alert to, signs of abuse;
- Ensuring all staff know they must report any concerns or suspicions to the Designated Safeguarding Leads, listed in this policy;
- Ensuring there is an effective structured procedure in place to be followed by all members of the school community in cases of suspected abuse;
- Providing a systematic means of monitoring children who have been identified as "in need" or at risk of harm;
- Keeping confidential records which are stored securely and shared appropriately with other professionals;
- Ensuring procedures are in place for dealing with allegations of abuse against members of staff and volunteers;
- Establishing effective joint working relationships with all other agencies involved in safeguarding children and ensuring that the school contributes effectively to external assessments of need and support plans;
- Operating safer recruitment procedures and making sure that all appropriate checks are carried out on new staff who work with pupils (see Safer Recruitment Policy);
- Ensuring that all adults (including other community users of our facilities) have been checked as to their suitability;
- Ensuring that all staff agencies are aware of the school's safeguarding procedures and policy and are made aware of any safeguarding concerns in relation to agency staff.
- Working with parents to build an understanding of the school's duty to safeguard and promote the welfare of all children, including the necessity for child protection policy and procedure, information sharing and work in partnership with other agencies.

1 Core safeguarding principles

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

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 and other partners.

3. Safeguarding legislation and guidance

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

- Section 175 of the Education Act 2002 (Local maintained schools only)
- Section 157 of the Education Act 2002 (Independent schools only, including academies and Free Schools)
- The Education (Independent School Standards) Regulations 2014 (Independent schools only, including academies and Free Schools)
- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- Education and Training (Welfare of Children) Act 2021 (16-19 Academies and Independent Training Providers)
- Human Rights Act 1998
- The Equality Act 2010
- Data Protection Act 2018 and the GDPR
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2023 (HM Government December 2023, Updated 23rd February 2024)
- Keeping Children Safe in Education 2024 (Department for Education, 2nd September 2024)
- Information Sharing: advice for practitioners providing safeguarding services (Department for Education, May 2024)
- What to do if you're worried a child is being abused 2015 (Department for Education, March 2015)

- Early Years Foundation Stage Statutory Framework (4th January 2024)
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014)
- The Teacher Standards 2012

4. THSCP (Tower Hamlets Safeguarding Children Partnership) Guidance

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

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

5. Tower Hamlets Safeguarding Children Partnership

The Children's 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, namely: the **Local Authority** (Children Services), **Health** (Tower Hamlets Clinical Commissioning Group) and Tower Hamlets Borough **Police** now collectively hold statutory responsibilities for safeguarding children and have published arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. More information about the Tower Hamlets Safeguarding Children Partnership can be found on the website: https://www.towerhamlets.gov.uk/lgnl/health_social_care/children_and_family_care/Safeguarding-Children-Partnership/Safeguarding-Children-Partnership.aspx

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

cooperate with the THSCP multi-agency arrangements. This includes responding to safeguarding audits of quality and compliance, as requested by the local authority and/or local safeguarding partners.

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

6. Key Definitions

Safeguarding and promoting the welfare of children is:

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

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

Child includes everyone under the age of 18.

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

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

7. Roles and responsibilities

The role of the school is to contribute to the identification, referral and assessment of children in need, including children who may have suffered, are suffering, or who are at risk of suffering, significant harm.

The school may also have a role in the provision of services to children in need and their families. The role of the school in situations where there are child protection concerns is not to investigate but to recognise and refer.

All staff should recognise that as frontline workers they are in an important position to identify concerns early, provide help and support to children, promote children's welfare, and prevent concerns from escalating.

All staff have a responsibility to provide a safe environment in which children can learn and also feel safe enough to disclose and issues.

All staff have a responsibility to report safeguarding concerns immediately to the DSL. (See appendices for referral forms and safeguarding procedures) If in doubt about any safeguarding matter, staff should **always** speak to the DSL.

All staff are expected to keep safeguarding values at the core of their daily conduct and understand that they have a legal duty to safeguard the child. The best interests of the child should determine their decision making, behaviour and any action taken.

The Governing Body have the strategic leadership responsibility for safeguarding arrangements at the school. As a collective body it must have regard to all relevant statutory guidance issued, including Keeping Children

Safe in Education, and ensure that school's safeguarding policies and procedures, including the current Child Protection Policy, are compliant with legislation and statutory guidance, reflect local safeguarding arrangements and are effective. In accordance with the statutory requirement the named member of the Governing Body who takes leadership responsibility for safeguarding at the school is referred to as the Safeguarding Link Governor. At St. Luke's, this is Rachel Clapham.

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

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

The Designated Safeguarding Leads (DSL):

The DSLs and Deputy DSLs have a specific responsibility for championing the importance of safeguarding and promoting the welfare of pupils registered in the school. They take the lead responsibility for safeguarding arrangements within the school on a day-to-day basis. They will have the complete safeguarding picture and are the most appropriate people to advise on the response to safeguarding concerns.

The role of the DSL includes:

- ensuring all staff read and understand the school's safeguarding policies and that procedures are followed by all staff;
- advising and supporting staff as they carry out their safeguarding duty;
- encouraging a whole school approach to safeguarding, with the welfare of the child underpinning all systems, policies, procedures, and decision making;
- promoting a culture of listening to the voice of the child and ensuring that there are formal and informal opportunities for that voice to be heard;
- ensuring timely and accurate referrals are made to children's social care, the police, or other agencies;
- keeping detailed, accurate, secure written records of concerns and referrals;
- participating in strategy discussions and inter-agency meetings and having a working knowledge of how local authorities conduct child protection conferences and child protection reviews, so as to attend and contribute to these effectively;
- liaising with the case manager and the Local Authority Designated Officer (LADO) where allegations are made against staff;
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements;
- transferring the child protection file to a child's new school and proactively contacting the new school in advance to help ensure a successful transition;
- supporting the school with regards to the requirements of the Prevent duty and providing advice and support to staff on protecting children from the risk of radicalisation;
- understanding of the unique risks associated with online safety and be confident in the knowledge required to keep children safe whilst they are online at school or college;
- recognising the additional risks that children with SEN and disabilities (SEND) face online, and confident they have the capability to support SEND children to stay safe online;
- undergoing the required 2-day refresher training every 2 years as a minimum and receiving regular updates to maintain the knowledge and skills to carry out the role, including Prevent awareness training;
- attending the borough's termly safeguarding briefings, and subscribing to Andrew Hall's Safeguarding briefings, to understand and keep up with any developments relevant to their role;
- ensuring the school or college's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensuring the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.

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

If the DSL or Head Teacher are unavailable, please contact the deputy DSL, or other members of the Safeguarding Team, who will deal with/record the concern and/or make contact with the DSLs or necessary authorities.

All Staff are expected to keep safeguarding values at the centre of their conduct, referring concerns immediately to the DSL. The best interests and voice of the child of the child should determine their behaviour and actions, as should the values and ethos of the school (set out above).

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

St Luke's Safeguarding team (including implementing the Prevent strategy)

Designated Safeguarding Lead:	Cristina King, Head of School
Deputy Designated Safeguarding Lead:	Christine Collins, Community Cohesion Leader Jessica Dewan, SENCo Nina Kerr, HLTA and Staff Governor
Designated Safeguarding Link Governor:	Rachel Clapham
Deputy Safeguarding Link Governor:	Felicity Legg
Online Safety Governor:	Michael Blaby
Designated teacher for Looked After Children:	Cristina King
Additional safeguarding team members:	School Psychological Therapist, Fiona Treasure Administrative officer, Absana Begum

Availability

During term time the designated safeguarding leads (or deputy) will always be available for staff to discuss any safeguarding concerns. Out of hours, all staff have the DSL's mobile number, and are invited to call her with any concerns that they have. Her mobile is shared in the staff handbook.

For more information, contact e-mails and numbers, please refer to Safeguarding Procedure for Staff and Referral Route for Safeguarding Concerns (Appendix 1 and Appendix 2)

To protect the children at St. Luke's, this team meets every 2 weeks. For dates and times of each meeting, please refer to the school's Monitoring and Evaluation Schedule, which is published annually. The frequency of meetings is to ensure that progress is being made for every child, and that prompt, joined up action is being taken when required.

The Headteacher will ensure that:

- The policies and procedures adopted by the Governing Body to safeguard and promote the welfare of pupils are fully implemented and followed by all staff, including volunteers;
- The procedures laid down by the London Child Protection Procedures 5th Edition are followed;

- Safer recruitment and selection of staff and volunteers is practiced;
- Our headteacher is the school's Strategic Safeguarding Lead - who is designated to take strategic responsibility for safeguarding within the school which includes work associated with Prevent.
- A Designated Safeguarding Lead(s) for day-to-day management of safeguarding and child protection – the Safeguarding Lead - is identified and receives appropriate on-going training, support and supervision.
- All members of the school's Safeguarding Team ensure that Prevent issues have been addressed in our school policy and practice. The term 'Safeguarding' when used, incorporates all work associated with the Prevent agenda.
- Sufficient time and resources are made available to enable the Designated Safeguarding Lead(s) to discharge their responsibilities, including attending inter-agency meetings, contributing to the assessment of pupils, supporting colleagues and delivering training as appropriate.
- All staff and volunteers receive appropriate training which is updated **annually**. This includes ensuring that all staff understand the role of the Designated Safeguarding leads;
- All staff have read Part 1 and Appendix A of 'Keeping Children Safe in Education, September 2024' and have signed to verify they have read, understood and will comply with all school policies and guidance, as well as Part 2 of the Teachers' Standards: 'Personal and Professional Conduct';
- All temporary staff and volunteers are made aware of the school's safeguarding policy and arrangements;
- All staff and volunteers feel safe about raising concerns about poor or unsafe practice in regard to the safeguarding and welfare of the pupils and such concerns will be addressed sensitively and effectively;
- Parents/carers are aware of and have an understanding of the school's responsibilities to promote the safety and welfare of its pupils;
- Confidential child protection files are securely stored in a separate filing cabinet apart from normal pupil records and with access confined to the Strategic Safeguarding Lead and the Designated Safeguarding Leads.

The Governing Body of the school will ensure that:

- A member(s) of the Governing Body is identified as the Designated Link Governor for Safeguarding and receives appropriate training. The identified Link governor(s) will provide the governing body with appropriate information about safeguarding and Prevent and will liaise with the Designated Safeguarding Lead(s);
- The Executive head teacher is the Strategic Safeguarding Lead, who is designated to take strategic leadership responsibility for safeguarding within the school;
- The Designated Safeguarding Lead(s) undertake training, in addition to basic child protection training, and refresher training at two-yearly intervals;
- The school's safeguarding policy is regularly reviewed and updated and the school complies with local safeguarding procedures;
- When the safeguarding policies are reviewed and shaped, the experiences and expertise of their staff will be taken into account;
- The school operates safer recruitment and selection practices including appropriate use of references and checks on new staff and volunteers;
- Procedures are in place for dealing with allegations of abuse against members of staff and volunteers and these are in line with local procedures;
- All staff and volunteers who have regular contact with pupils receive appropriate training which is updated annually;
- A section 11 self-assessment of safeguarding duties and child protection is provided to the Local Safeguarding Children's Board by the Strategic Safeguarding Lead;
- Appropriate filters and monitoring systems are in place that do not lead to unreasonable restrictions as to what children can be taught. In practice, an example of this would be making sure that the school does not block so much internet traffic that the children are then unable to learn about making wise choices;

- Children are taught about safeguarding, including online, through teaching and learning opportunities, as part of a broad and balanced curriculum;
- The curriculum is monitored to ensure aspects of safeguarding are embedded and that there is continuity across the key stages.

Child protection files.

When children leave the school or college ensure their child protection file is transferred to the new school or college at the start of the new academic year. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. In addition to the child protection file, the designated safeguarding leads will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that will allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

At St Luke's we maintain a variety of records on children. We have our management information system which maintains up to date information on pupils on the school roll including where and with whom the child is living, emergency contact information and attendance.

Additionally, the Designated Safeguarding team maintain confidential records of referrals to and support from other agencies, pastoral concerns, records of any statutory interventions/services and any other significant events in a child's life. These records are only available on a password protected folder on the school's network or in a locked filing cabinet in the headteacher's office and access to them is strictly controlled by the Designated Safeguarding leads. All information is treated sensitively and is only shared on a 'need to know' basis and when it is in the best interests of the child.

8. Rights of the child

The school upholds the Human Rights of the child in accordance with the Human Rights Act 1998.¹ It is unlawful for schools to act in a way that is incompatible with the European Convention on Human Rights. Specifically, the school embeds and upholds the following Convention rights of the child across its safeguarding policies and procedures:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination
- Protocol 1, Article 2: protects the right to education.

In accordance with the Equality Act 2010, 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). 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

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

Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not.

Within the context of safeguarding and promoting the welfare of children, we support pupils with protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. This might include taking positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need. This includes a duty to make reasonable adjustments for disabled children, including those with long term conditions. If it were deemed necessary, for example, positive action to support girls might be considered, if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

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

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

9. Children more vulnerable to risk of harm

All staff should recognise that all children are vulnerable but that some children may be more vulnerable than others and at more risk of harm.

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

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to 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

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

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

- 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.

10. Children in Need of/with a Social Worker

Children may need a social worker due to safeguarding or welfare needs. Children who have been allocated a social worker may have experienced abuse, neglect and belong to a family that has many complex circumstances. Staff should recognise that these children will have experienced adversity and trauma that can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. When making decisions about safeguarding, analysing risks and providing pastoral and academic support, the school will take seriously the fact that the child in need of a social worker will require enhanced support alongside that provided by statutory services.

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. Staff with concerns about a child who has previously had social worker intervention should refer immediately to the DSL and safeguarding team, who will consider next steps and appropriate additional support.

The school will co-operate with the Virtual School, which now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children known to a social worker.

11. Children requiring Mental Health Support

All staff have an important role in supporting the mental well-being of children and are well placed to observe and identify behaviour that may suggest a child is experiencing a mental health problem, or be at risk of developing one.

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, mental health, behaviour and educational impact that adverse childhood experiences, including abuse, bereavement and separation of parents, can have on a child; often resulting in lasting impact throughout childhood, adolescence and into adulthood (KCSIE 2020)

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.

All staff should be clear that only appropriately trained professionals should attempt to make a diagnosis of a mental health difficulty.

If staff have a mental health concern that is **not** also a safeguarding concern, they will clearly record any concerns they may have, regarding the mental health of the child, and refer to the DSL to agree a course of action. These might include referring the child to the school's Psychological Therapist (Mental Health Lead: Fiona Treasure) or a referral to CAMHS.

If staff have a mental health concern about a child who is also a safeguarding concern, immediate action will be taken, following the school's Safeguarding and Child Protection Policy and speaking to the designated safeguarding lead or a deputy. (The DFE has published advice and guidance on Mental Health and Behaviour

in Schools). If the child is already a safeguarding concern, the school might refer to CP or to Early Help for advice.

12. Looked after children and previously looked after children

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

Children who are looked after, or have left care (through adoption, special guardianship or child arrangement orders or who were adopted from state care outside of England or Wales) remain vulnerable, both for safeguarding and child protection reasons and, consequently, often underachieve in their learning. It is essential that we work closely with additional agencies to support all children at St. Luke's who are, or who were, in care.

Staff have the skills, knowledge and understanding to safeguard Looked After Children and Care Leavers. The DSL and Designated Teacher will work with relevant agencies and take immediate action to safeguard and provide support to this vulnerable group of children.

At St. Luke's our Designated teacher for Looked After Children is Cristina King (DSL). We have a separate 'Looked After Children' policy.

The Designated teacher for Looked After Children will work with the Tower Hamlets Virtual School to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan.

The Designated teacher for Looked After Children will notify the teacher if a child who is looked after, or was previously looked after, is in their class or care. The school's role will be to exercise continued vigilance, to ensure that the child continues to be safe, and to make educational progress, and will take swift and effective action in line with our procedures if we have any concerns. Teachers will need to consider adjustments and interventions to enable a child to catch up or progress further with their learning.

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

13. SEND Children

Any child with a disability is by definition a 'child in need' under section 17 of the Children Act 1989 and disability has been shown to confer an increased level of vulnerability. Studies have shown that disabled children are 3.8 times more likely to be neglected, 3.8 times more likely to be physically abused, 3.1 times more likely to be sexually abused and 3.9 times more likely to be emotionally abused.

At St Luke's we understand and are aware that children with special educational needs (SEND) or physical health issues can face additional safeguarding challenges.

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. In the case of a disabled child, and in addition to the universal indicators of abuse, the following abusive behaviours should also be considered:

- Force feeding
- Unjustified or excessive physical restraint
- Rough handling
- Extreme behaviour modification including the deprivation of liquid, medication, food or clothing

- Misuse of medication, sedation, heavy tranquillisation
- Invasive procedures against the child's will
- Deliberate failure to follow medically recommended regimes
- Misapplication of programmes or regimes, medical or behavioural for example.

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 disproportionately impacted by behaviours such as bullying (including prejudice-based bullying) without outwardly showing any signs;
- children not understanding that what is happening to them is abuse; and
- communication barriers when reporting abuse and difficulties in overcoming these barriers;
- being more prone to peer group isolation than other children.

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), but staff should speak with the DSL and SENDCO in the first instance.

All staff are regularly trained to understand and be aware of the additional barriers that exist when safeguarding SEND children. All staff need to be aware that SEND children may be more vulnerable when online and using digital platforms, and it is important that Online Safety lessons and related advice are tailored to their individual needs. At St-Luke's, mental wellbeing, healthy relationships and staying safe online being embedded into PSHE/Relationships education, relationships and sex education (RSE) and health education curriculum. "This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. (See online Safety Policy).

At St. Luke's we have increasing numbers of children with Special Educational Needs (SEND) or physical health issues. To address these challenges, we have enhanced pastoral support for these children in place, with teams around each child maintaining regular and effective communication about their needs and ongoing progress. Children with SEN and disabilities will have access to a variety of forms of in school mentoring and support which include:

- In class teaching assistant support;
- 1:1 teaching assistant support;
- Support from an Emotional Literacy Support Assistant (ELSA);
- Emotional and mental health support from school's Psychological Therapist (Mental Health Lead: Fiona Treasure).
- Health Care Plans and support from the school nurse.
- Intimate Care Policy procedure.
- Provision to ensure that all pupils, regardless of need, can access the 'worry box' in their classroom in one way or another so that they are able to communicate a need/worry/concern if they wish to.

14. Children absent from education and children missing education

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

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

The school will carry out daily registration and absences will be dealt with in accordance with the school's Attendance Policy, and as part of its safeguarding duty, starting immediately with first day calling.

Where reasonably possible, we will hold **more than one emergency contact number** for each pupil. This is to give us additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

When a pupil leaves the school, the school will make contact with the receiving school to ensure the child is registered at the school and has started to attend.

Any Child Protection documents will be forwarded in line with the Child Protection Record Keeping Guidance 2015. Where we have very particular concerns about a child, who we know is about to leave the school and start attending at another school, we would seek to share information with the receiving school, as appropriate, in advance, so that they can be well prepared to provide the pupil with continuity of care.

When a pupil leaves our school without clear indication of a receiving school, the school will contact the Local Authority AWO to advise them of the situation and to start their tracking procedures. 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, Nasihah.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.

St Luke's will inform the Local Authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

15. Elective Home Education.

The school recognises that parents have a legal right to electively home educate their child at home; however, it is expected that the parents' decision to do this is made with their child's best education and best interests at its heart.

Staff should be aware that even though most home educated children have a positive experience, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

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

In accordance with LBTH Policy this meeting must occur before any final decision is made by the parents, to ensure that the best interests of the child have been taken fully into account and carefully considered. The occurrence of this meeting is especially important when the children have known vulnerabilities including Children known to a Social Worker and SEND children.

16. Whistleblowing

We recognise that children and young people cannot be expected to raise concerns in an environment where staff fail to do so.

The school has a separate policy in respect of 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.

You are protected by law if you report any of the following:

- A criminal offence;
- Someone's health and safety is in danger;
- Risk or actual damage to the environment;
- A miscarriage of justice;
- The establishment is breaking the law;
- You believe someone is covering up a wrongdoing.

If you 'blow the whistle' you shouldn't lose your job or be treated unfairly. You can raise past and current concerns and also those you believe may happen in the near future.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, they should consider other channels available as set out in the Government's List of Prescribed Bodies and Persons including:

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

17. 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 procedures will be followed, and all action taken will be in line with KCSIE 2024 Part 4 and the THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – September 2024.

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 Executive Head Teacher and ensure that it is put in writing, signed and dated. If the subject of the allegation is the Executive Headteacher then the allegation should be directly reported to the Chair of Governors.

St Luke's Primary School will make sure that the pupil or adult who has expressed the concern or made the complaint will be informed not only about the action to be taken but also where possible about the length of time required to resolve the complaint. The school will endeavour to keep the pupil or adult informed about the progress of the complaint/expression of concern.

On receipt of a report of an allegation, the Headteacher will make immediate contact with the Local Authority Designated Officer for an initial discussion.

When an allegation is made against a supply member of staff, the Head Teacher will find out the facts and liaise with the Local Authority Designated Officer (LADO) to determine a suitable outcome: whether it is appropriate to suspend the supply teacher or redeploy them to another part of the school, whilst investigations are carried out.

Where using an agency, school will inform the agency of its process for managing allegations, including inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

If the allegation concerns the Headteacher, then the Chair of Governors shall make contact with 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.

LBTH Local Authority Designated Officer (LADO): Melanie Benzie

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

Telephone: 0207364 0677

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

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.

For an overview of procedure for managing allegations against staff and volunteers working with children in school, all staff are directed to read Appendix 7. The policy document can be found in the all staff policies folder on the shared One drive.

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 Section 5 of the school's Staff Code of Conduct.

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

18. Staff safeguarding training, including training for governors

All staff and volunteers receive appropriate safeguarding and child protection training at least annually. Additionally, all staff will receive safeguarding and child protection updates throughout the year, via staff briefings, staff meetings and by email. In addition, Governors have safeguarding training as part of the Governing Body Meetings and maintain their knowledge through safeguarding training and updates.

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

Induction training includes:

- The Safeguarding and Child Protection Policy and associated policies including the Behaviour Policy, On line safety policy, procedures for managing children who are missing from education and the staff code of conduct.
- Information re the DSL/s, safeguarding team, reporting, procedures and pathways.
- How to manage a disclosure from a child as well as when and how to record a concern about the welfare of a child.
- Signs and symptoms of abuse (emotional, physical, sexual and neglect)
- Additional safeguarding issues and whole school responsibility.
- Most recent KSCIE updates.
- KCSIE part 1 and Annex B delivery.

All staff (and governors) are required to read Part 1: Keeping Children Safe in Education 2024 and Annex B

A record will be kept to ensure that all staff, and governors, receive safeguarding induction training. For those who miss training, additional training opportunities will be arranged asap in the new academic year.

This information is revisited across the year in training sessions/safeguarding staff meetings when updates are provided.

The Designated Safeguarding Leads will receive refresher training every two years as well as further higher-level training and termly updates.

19. Safer recruitment and selection of staff

St Luke's recruitment procedures comply with the statutory guidance in the 2018 Childcare Disqualification Regulations, Keeping Children Safe in Education 2024 part 3 and with the local safeguarding partner

arrangements by carrying out the required checks and verifying the applicant's identity, qualifications and work history.

At least one member of each recruitment panel will have attended safer recruitment training.

The school has a policy in place to accompany this one called: '**Safer Recruitment Policy**'.

20. Visitors

St. Luke's School appreciates and values the educational benefits of outside speakers visiting the school to address pupils and/or staff. However, we recognise our responsibilities to the pupils in our care and require a number of Safeguarding procedures to be followed. These procedures are detailed in our Visiting Speakers Policy.

Briefly:

- The Headteacher must be informed in advance that a visiting speaker is to be invited to the school.
- The Headteacher can then give outline authorisation for the speaker to be booked.
- The Headteacher then initiates the vetting process.
- Final clearance for the visiting speaker can then be granted by the Headteacher.
- If the school has any concerns during the vetting process, we will pass any relevant information to the Local Authority Prevent officers.
- The member of staff responsible for booking the speaker must ensure the Visiting Speaker agreement form is read and signed prior to the presentation, when at least one member of staff will be present at all times.

All visitors:

- Are met on arrival at reception where they sign in and an ID badge is issued.
- Are accompanied by a member of staff to and from Reception.
- Are provided with an overview of CP safeguarding procedures and named staff/contacts (if working with children)
- If concerns are raised regarding the visitor, the Designated Safeguarding Leader and/or Headteacher will take action to address the concern in line with the school's Safeguarding and Child Protection policy.

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. Extended school and off-site arrangements

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 Keeping Children Safe during community activities, after school-clubs and tuition: non-statutory guidance for providers running out-of-school activities (April 2022). The school will ensure that all safeguarding requirements are set out clearly in the lease or hire agreement with the organisation, as a condition of use and occupation of the school premises; and that failure to comply would lead to the termination of the agreement.

At St Luke's we have a breakfast club to provide an affordable, early drop-off childcare facility for parents/carers; helping to improve attendance and punctuality and provide children with a nutritious breakfast at the start of the day in a pleasant and relaxed environment.

We have a separate **Breakfast Club Policy** which clearly states procedures in place for safer recruitment, safeguarding and health. Briefly:

- In accordance with Safeguarding arrangements, all staff involved in the running of the Breakfast Club, either in a paid or voluntary capacity have current DBS (CRB) clearance. These records are held in the school office.
- Breakfast club staff follow existing school policies and procedures for safeguarding, child protection and the code of conduct.
- Where ICT equipment is used, they also follow the schools Internet Safety policy and procedures.
- A separate risk assessment has been completed for Breakfast Club sessions and activities.

St Luke's School has a detailed **Educational Visits Policy** which addresses risk assessment for both *extended and off site* activities. This can be found on staff shared under 'Policies'.

In **brief** it specifies that:

- A risk assessment will be carried out at least two weeks in advance of the visit to identify hazards.
- First Aid provision will be considered when assessing the risks of the visit. For most trips, a qualified first aider will attend the trip and First Aid kits must be taken on all visits. Special consideration is expected to be made for those with medical needs.
- Recommended ratios for adult:children are:
Nursery and Early Years 1:3
Key Stage One 1:8
Key Stage Two 1:10
In practice, the ratio should be determined by factors such as type of activity, any SEN or medical needs, experience of the staff, venue, transport and weather conditions.
- An aspect of a trip carrying the highest level of risk is the use of public transport. The Visit Leader must exercise extreme care when the children are getting on and off public transport.
- Children in the Early Years and Key Stage 1 will wear high viz vests over their coats for the duration of any travelling. If you are travelling with pupils or staff who require a wheel chair, make sure that you make arrangements in advance with Transport for London, for ramps.
- Pupils should have a clear understanding about what is expected of them and what the visit will entail. Children with SEN or behavioural issues will be provided with support in terms of preparing for the change of routine and managing behaviours (this might come from the SENco).
- Every effort will be made to support **pupils with special educational and medical needs**, whilst maintaining the safety of everyone on the visit. Special attention will be given to appropriate supervision ratios and additional safety measures which may need to be addressed at the planning stage.
- Residential trips will be planned well in advance and arrangements will be overseen by the Health and Safety Manager.
- Parents will be invited to a briefing session to discuss the details of the trip and to meet the staff attending. The Visit Leader should be an experienced, senior member of staff.
- Residential trips must be approved by the Governing Body and by the LEA via the EVOLVE system. Approval will be arranged by the Health and Safety Manager.
- All parent helpers will be List 99 checked in the week before the trip is due to happen. Visit leaders need to notify the office of who the parent helpers are at the point that the risk assessment is being submitted for authorisation. Those helpers who are not DBS checked will not be alone with children and must be guided by school staff at all times.

22. Staff/pupil Online Relationships, Online Safety.

Professional conduct is expected at all times and all staff must have read the Staff Handbook and ensure they have read, understood and are operating within the terms and conditions set out in the Council's Code of Conduct for Employees, a copy of which can be obtained from the Headteacher.

All staff must read and sign the school's Acceptable Use Policy before using any school ICT resource.

Personal online relationships between staff and pupils are prohibited and would be referred to the Executive Headteacher and dealt with according to the school's disciplinary and child protection procedures, with *all* Internet Safety complaints and incidents recorded by the school — including any actions taken.

The school has an **Online Safety Policy** which addresses how social networking, social media and personal publishing be managed for the safeguarding of both pupils and staff. Briefly:

- St Luke's C of E Primary School will block/filter access to social networking sites.
- Pupils will be advised never to give out personal details of any kind which may identify them and / or their location. Examples would include real name, address, mobile or landline phone numbers, school attended, IM and e-mail addresses, full names of friends, specific interests and clubs etc.
- Pupils should be advised not to place personal photos on any social network space.
- They should consider how public the information is and consider using private areas.
- Staff should be advised not to store photos or videos of current/ex-pupils on their personal phones/devices. Staff should use school-approved technology i.e. school iPads and school laptops.
- Staff should be advised not to communicate or 'friend' current/ex-pupils on social media in private use.
- Advice should be given regarding background detail in a photograph which could identify the student or his/her location e.g. house number, street name or school.
- Pupils should be advised on security and encouraged to set passwords, deny access to unknown individuals and instructed how to block unwanted communications. Students should be encouraged to invite known friends only and deny access to others.

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, often provided in the school's newsletters and website, and through in-school online safety workshops, when available (supporting, for example, parents making safe their children's digital devices.)

23. Use of Mobile phones

Mobile phones have a place in settings such as classrooms without a phone connected to the office, and on outings. They can be the only means of contact available in those situations and can be helpful in ensuring children are kept safe. To protect children, we will:

- Only use mobile phones appropriately, and ensure staff have a clear understanding of what constitutes misuse – staff are referred to the school's **Staff Handbook** for clear guidance in relation to this.
- Ensure the use of a mobile phone does not detract from the quality of supervision and care of children.
- Ensure all mobile phone use is open to scrutiny.
- Ensure any staff known or seen to be using a mobile phone, when it has not been agreed to do so, will be disciplined.
- Prohibit staff from using their mobile phones to take pictures of the children.
- Ask visitors either to turn their mobile phones off or to store them in the office before viewing the school.
- Ensure the use of mobile phones on outings is included as part of the risk assessment, for example: how to keep personal numbers, that may be stored on the phone, safe.

24. Use of Cameras: photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect children, we will:

- Obtain parents' and carers' consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Avoid using the child's name with an image.
- Ensure that children are appropriately dressed.
- Ensure the setting's designated iPad is only used in the setting.
- Ensure parents and carers are aware of taking photographs and videos are only used for their purposes relating to their own children.
- Ensure all iPads used are open to scrutiny.

For more information – please refer to the school's 'Photograph and Image Policy'.

25. Identifying abuse

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

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

If we have referred a case to children's social care, we need to make sure that we provide as much information as possible as part of the referral process. By doing so we ensure that any assessment will be able to take into account the full range of evidence and the full context of any abuse.

26. Indicators of Abuse

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

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

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

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

protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.

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

27. The 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 St-Luke's the staff are aware of the importance of the child's voice and recognise that it takes great courage for a child to share a concern around abuse. 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.
- Staff will therefore exhibit professional curiosity and understand that a child may be communicating a concern through their actions and behaviours and take a safeguarding approach when responding to behaviours.
- Children are made aware that their physical, mental and emotional safety and wellbeing is of the school's utmost priority and responsibility.
- Children are encouraged to share feelings/disclosures with trusted members of staff and the safeguarding team.
- Staff will take children's disclosures and concerns seriously and refer to the DSL and safeguarding team using Blue Concern forms and with reference to school safeguarding procedures.
- Posters around the school identify the members safeguarding team for staff and children alike.
- Children are made aware of the school's psychological therapist, and mentoring programmes, and the support that can be offered.
- Children are encouraged to use their class 'worry box' to communicate a need/worry/concern if they wish to.
- At St-Luke's, mental wellbeing, healthy relationships and staying safe online are embedded into PSHE/Relationships education, relationships and sex education (RSE) and health education curriculum.
- Class circle time provides opportunities for children to voice any concerns.
- Staff will provide a safe space for children to share their concerns and address any issues in relation to sexuality and gender identity.

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

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

CSE risks to children are communicated through the schools PSHE and RSE curriculum.

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

29. Child Criminal Exploitation including County Lines

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any sexual or 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.

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, 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.

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

Some of the following can be indicators of CCE:

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

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs 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](#).

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

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

30. Serious youth violence

In our vigilance over the children in our care, we also need to be aware of indicators that may signal that children are at risk from, or are involved with, serious violent crime. These include:

- Increased absence from school;
- A change in friendships or relationships with older individuals or groups; (Local knowledge is important here, and feedback regarding who a child is spending time with outside of school from another parent for example, should not be overlooked)
- A significant decline in performance;
- Signs of self-harm;
- Significant change in well-being;
- Signs of assault;
- 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. There are a number of prominent gangs operating on the Island and the recruitment of young vulnerable children is quite common, especially in relation to the earlier section on child exploitation and in relation to county lines. Any concerns, even if only 'gut instinct' should be referred to the DSL without delay, using the blue form and discussion.

31. Online Harms

At St Luke's, increasingly, our experience is that the use of technology, by some children, sees them behaving in ways that are inappropriate for their age and include bullying behaviour. Our aim is to protect and educate the school community in their use of technology. An effective approach to online safety empowers a school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

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

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

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

The breadth of issues classified within online safety is considerable, but can be categorised into four main areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racism, prejudice-based content, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- Contact: being subjected to harmful online interaction with other users; for example peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention of grooming or exploiting them for sexual, criminal; financial or other purposes;
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual or non-consensual sharing of nudes and semi-nudes), and/or pornography, sharing other explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. When pupils are at risk of phishing, school can report concerns to the Anti-Phishing Working Group (<https://apwg.org/>).

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

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

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

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

Keeping Children Safe in Education obliges schools to "ensure appropriate filters and appropriate monitoring systems are in place [and] not be able to access harmful or inappropriate material [but at the same time] be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."

At St Luke's Primary School, the internet connection is provided by LGfL. This means we have a dedicated and secure, schoolsafe connection that is protected with firewalls and multiple layers of security, including a web filtering system called WebScreen 3, which is made specifically to protect children in schools. You can read more about why this system is appropriate on the UK Safer Internet Centre's appropriate filtering submission pages [here](#).

There are three types of appropriate monitoring identified by the Safer Internet Centre. These are:

1. Physical monitoring (adult supervision in the classroom, at all times)
2. Internet and web access
3. Active/Pro-active technology monitoring services

At St. Luke's Primary School, we have decided that options 1 and 2 are the most appropriate.

When pupils log onto any school online accounts i.e. Microsoft Teams, PurpleMash, Bug Club etc, on a personal device, activity may also be monitored here.

When pupils log into any school system on a personal device, activity may also be monitored here. This will apply when logging into a Chromebook/Chrome profile/Microsoft profile, for example.

St Luke's 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.

- At St. Luke's we ask that all staff take these statistics into consideration when observing children's online behaviour as well as when delivering the Online Safety and RSE Curriculum each year.
- We ask that staff recognise 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.

- As a school, we encourage our parents and carers not to give their children mobile phones especially before Y6 and in Y6 only if they independently travel to and from school. This is because most young children are not yet ready to manage themselves safely with such easy access to the online world.
- All staff must read and sign the **Acceptable Use Policy** before using any school ICT resource. We have a separate **Internet Safety Policy** which addresses online use and safety. Staff are expected to read it in partnership with this policy. It addresses how we seek to protect children from potentially harmful and inappropriate online material and behaviours with appropriate filters and monitoring systems in place.
- We recognise that access to the internet creates a whole new world of risk for children. Issues around cyber bullying, which are associated with emotional abuse, are considered in our Anti Bullying Policy as well as in this.
- If you have any concerns, make sure they are recorded in writing, discuss with a DSL as soon as possible and follow the staff safeguarding procedure (Staff Safeguarding Procedure: Appendix 1; Blue Record of Concern Form: Appendix 5)

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.

32. 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.

33. So-called honour-based abuse

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If you are in any doubt, please make sure you discuss the matter with the Designated Safeguarding Leads. We need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. If there is a perceived risk the Designated Safeguarding Leads will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

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 Honour 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

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

In England, Wales and Northern Ireland, FGM is a criminal offence under the Female Genital Mutilation Act 2003. **[HM Government Multi-Agency Statutory Guidance on FGM, Updated 30th July 2020](#)**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students. Teachers **must** personally report to the police cases where they discover

that an act of FGM appears to have been carried out. However, teachers should notify the Designated Safeguarding Lead of this action as well as reporting the disclosure of FGM in line with school's safeguarding procedures.

The duty on teachers to report to the police does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures and report concerns to the Designated Safeguarding Lead. If in doubt, staff should speak to the Designated Safeguarding Lead.

Forced marriage

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

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

For further information, please see: Forced Marriage Unit's Statutory Guidance and Multi Agency Guidelines [The Right to Choose](#) Updated June 2022

Virginity Testing and Hymenoplasty

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

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

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

34. Radicalisation and Extremism

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

PREVENT

At St Luke's, we recognise that access to the internet creates a whole new world of risk for children, including issues around grooming for radicalisation or Extremism.

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. Extremism is defined as the holding of extreme political or religious views.

The Governing Body has a zero tolerance approach to extremist behaviour for all community members. We rely on our strong values to steer our work and ensure the pastoral care of our pupils protects them from exposure to negative influences. Furthermore, our positive promotion of our Code of Conduct, **Be Kind: Be Safe: Be Responsible** equips our pupils with the skills to reject violence in all its forms.

Aims and Principles: The main aims are to ensure that staff are fully engaged in being vigilant about radicalisation; that they overcome professional disbelief that such issues will not happen here and ensure that we work alongside other professional bodies and agencies to ensure that our pupils are safe from harm.

The principle objectives are that: Pupils are encouraged to adopt and live out our Core Values. These complement the key "British Values" of tolerance, respect, understanding, compassion and harmonious living. Pupils are helped to understand the importance of democracy and freedom of speech, through their PSHCE curriculum and through the elected School Council members. The curriculum teaches pupils how to keep themselves safe, in school and when using the internet.

Pupils participate in local community events so that they appreciate and value their neighbours and friends who may not share their faith background.

Pupil's wellbeing, confidence and resilience is promoted through our planned curriculum and out of hours learning opportunities. Pupils are supported in making good choices from a very young age, so they understand the impact and consequences of their actions on others.

Governors, teachers, teaching assistants and non-teaching staff demonstrate an understanding of what radicalisation and extremism are and why we need to be vigilant in school.

The Office for Security & Counter Terrorism works to counter the threat from terrorism and their work is detailed in the counter terrorism strategy CONTEST.

This strategy is based on four areas of work:

Pursue - To stop terrorist attacks

Prevent - To stop people becoming terrorists or supporting terrorism

Protect - To strengthen our protection against a terrorist attack

Prepare - To mitigate the impact of a terrorist attack

Our role, as a school, is outlined more specifically in the DCSF document 'Learning together to be safe': A toolkit to help schools contribute to the prevention of violent extremism. Primarily our work will be concerned with **PREVENTION** and is outlined more specifically in the DCSF document 'Learning together to be safe'.

Procedures for referrals: Although serious incidents involving radicalisation have not occurred at St Luke's to date, it is important for us to be constantly vigilant and remain fully informed about the issues which affect the region in which we teach. Staff are reminded to suspend any professional disbelief that instances of radicalisation, could not happen here and to refer any concerns through the appropriate channels, following the school's normal safeguarding procedures, including discussing with the school's designated safeguarding lead.

We follow the London Borough of Tower Hamlets referral pathway (Appendix 3.)

The role of the curriculum: Our curriculum promotes respect, tolerance and diversity. Children are encouraged to express themselves through discussions, debates and consultations. The R.E. and PSHCE provision is embedded across the curriculum and underpins the ethos of the school and British values of democracy, rule of law, respect, tolerance and liberty. Children learn about other faiths, visit places of worship and are taught about how to stay safe when using the Internet.

Staff Training: Through INSET opportunities in school, we will ensure that our staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalisation; are aware of the process of radicalisation and how this might be identified early on.

The school completes and reviews a Prevent Risk Assessment and Prevent Checklists as part of its Prevent Duty on a yearly basis.

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.

For further information, please see: **Statutory guidance on the Prevent duty 2023 (Updated March 2024), 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).

35. 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.

At St. Luke’s we seek to minimise the risk of child-on-child abuse through the implementation of our curriculum and associated policies:

- Our policy on the prevention and management of bullying acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.
- Our Relationships and Sex Policy/PSHCE Scheme outline how the school prepares the children for age-appropriate relationships and physical contact.
- See the curriculum section earlier in this policy re online safety and behaviour.

In particular, at St. Luke’s, our relentless focus on our school values, strives to enable children to be respectful of one another and to be responsible for their ‘positive’ impact upon one another in a safe way.

We are clear however that abuse is abuse, it could happen here, but if it does, it will not be tolerated. Part of our duty for safeguarding is also teaching the children appropriate behaviours/language to avoid safeguarding matters escalating for them.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. As part of the reassurance to children, it will be made clear to children that the law is in place to protect them from abuse rather than to criminalise them.

If you are concerned about potential child on child abuse, you must report it to the Designated Safeguarding leads using the school’s **BLUE confidential form** and attending to Safeguarding procedures for staff (Appendix 1 and Appendix 5 in this policy)

If you suspect that children are involved in sexting – please refer to the guidance produced by the UK Council for Children Internet safety (Appendix 8)

In partnership with you, the Designated Safeguarding leads will decide what further action to take which may include, but is not limited to, the following:

- Discussions with alleged victim and perpetrator to understand the extent of the harm;
- Discussions with the alleged victim and perpetrators parents regarding the extent of the harm and a support plan to respond;
- The use of restorative practices to enable children to fully learn about and understand the extent of the harm that has been committed and to empower them to take responsibility for their actions;

- A support plan may include a referral to the school's Psychological Therapist;
- Discussions with the Early Help Hub may be sought to determine what support could be sought by both the alleged victim and perpetrator. This is likely to be appropriate if the abuse may have stemmed from a lack of structured time outside of school.
- If there is evidence of producing or sharing sexual imagery, social care/the police will be informed immediately.

36. 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:

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

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

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

- sexual exploitation, co-ercion and threats

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

Any concerns about sexual harassment and harmful sexual behaviours must be recorded factually and without personal judgement and reported to the Designated Safeguarding Lead immediately. In determining how to proceed, the Designated safeguarding lead, who will have the complete safeguarding picture, will refer to the detailed guidance in Keeping children safe in education, Part 5, September 2024.

In particular, the DSL will consider the wishes of the victim in terms of how they want to proceed. We recognise that victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered.

Each report will be considered on a case-by-case basis and is likely to result in one or more of the following:

- Internal management in line with behaviour and bullying policies, with follow on pastoral support;
- A referral for Early help services;
- A referral to children's social care;
- In partnership with children's social care, a referral to the police.

We recognise that both the victim and the perpetrator will require follow on support.

The perpetrator more than likely will have unmet needs. Risk assessment will need to be undertaken to minimise further risk to others as well as harm to the perpetrator themselves. Partnership with agencies outlined above will be essential in guiding our response to each individual case.

Sexual violence offences are defined under the Sexual Offences Act 2003

37. 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 non-statutory guidance, [Sharing Nudes and Semi-Nudes. Advice for Education Settings working with Children and Young People](#) (Updated March 2024).

In the latest advice for schools and colleges (UKCCIS, 2024), sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'.

It does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and *must* be referred to the police.

If an incident of sexting comes to your attention, report immediately to the DSL who will determine how to proceed with reference to internal policy.

- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

When an incident involving nudes and semi-nudes comes to the attention of any member of staff in an education setting:

- the incident should be referred to the DSL (or equivalent) as soon as possible
- the DSL (or equivalent) should hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- there should be subsequent interviews with the children or young people involved (if appropriate)
- parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm

- a referral should be made to children’s social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

For further information:

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

38. Bullying (including cyberbullying)

Bullying is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyberbullying and prejudice-based bullying should be reported and will be managed through the St-Luke’s anti-bullying policy and procedures or, depending on context, the Safeguarding Policy. in accordance with Keeping Children Safe in Education 2024 and Behaviour in Schools. Advice for Head teacher and School Staff (September 2022).

At St. Luke’s our school values and PSHCE curriculum contribute to the addressing of bullying concerns and relationship. We have a separate anti-bullying policy, which can be referred to for information in greater detail.

39. 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

40. 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.

41. 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.

42. 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](#).

43. Young Carers

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

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

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

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

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

44. 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.

45. 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.

46. Taking safeguarding action

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

- in an emergency take the action necessary to help the child (including calling 999)
- report your concern as soon as possible to the DSL, no later than the end of the day. Complete a blue concern form and email it to: safeguarding@stlukeslondon.org These emails are checked daily. If you believe that there is a threat of imminent harm to a child, you must **speak to the DSL in person immediately**, or in her absence, a DDSL.
- 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. **This is the blue concern form, which is found online in the All Staff Team.**
- seek support for yourself if you are distressed.

47. Early Help

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 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.

Early sharing of information or concern in regards to a child or their family could trigger support for the child and their family that in turn means a more serious safeguarding matter is avoided.

We recognise that any child may benefit from Early help, as such we are consistently vigilant for all children, however we recognise the need to be particularly alert to the potential need for early help, for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan)

- Has a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child.

Staff at St. Luke's are expected to be consistently vigilant and aware that safeguarding incidents and/or behaviours can also be associated with factors outside the school. All staff (but especially the Safeguarding Leads) are expected to consider whether children are at risk of abuse or exploitation in situations outside their families: for example: sexual exploitation, criminal exploitation, and serious youth violence. (KCSIE 2021)

Staff at St Lukes scrutinise children's behaviours and what they say. This is of particular importance during home visits and when the children are engaged in role play in the Early Years and playtimes. We live in stressful times. We know that by offering the right support, early on, and helping children and families to make safe choices we can avoid situations escalating and safeguarding matters arising.

If a member of staff is aware of a potential concern, they are expected to report this to the Designated Safeguarding leads using the **BLUE confidential form** and standard safeguarding procedure.

You may also refer to the Staff Safeguarding Procedure and Safeguarding Referral Route for relevant contact numbers and email addresses if a Designated Safeguarding Lead or Deputy is not available.

The Designated Safeguarding Leads and deputy will lead on liaising with other agencies and setting up an inter-agency/Early help assessment as appropriate.

Staff are expected to cooperate with this process and support other agencies and professionals as required.

At St. Lukes, we will ensure that someone from the Safeguarding team, detailed at the beginning of this policy, will act as the Lead professional for each case.

All cases are kept under review, by the Safeguarding team in their regular meetings.

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 consideration is seriously given to making a referral to Children's Social Care.

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

Social Inclusion Panel

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

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

48. Handling the reporting or sharing of concerns

When a child discloses that they have been or are being abused, they may feel ashamed, especially if the abuse is sexual, and feel frightened lest their abuser finds out they have made a disclosure. The child may have been threatened, they may have lost all trust in adults; or may believe that they are to blame for the abuse. Sometimes the child may not understand that what is happening is abusive.

Staff should reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. During their conversations with the pupils, staff will:

- Allow the child to speak freely;
- Remain calm;
- Allow silences;
- Do not ask leading questions;
- Tell the pupil what will happen next;
- Inform the DSL as soon as possible;
- Seek support if they feel distressed.

Parents may not be immediately informed of the concerns if there is thought to be an immediate risk of harm to the child in doing so.

49. Confidentiality and sharing information

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

At St. Luke's, staff ensure that confidentiality protocols are followed and information is shared appropriately. All staff will understand that safeguarding requires a high level of confidentiality. Staff should only discuss concerns with the DSL, Deputy DSL or the head teacher.

The headteacher, the Designated Safeguarding Lead and the Deputy Designated Safeguarding leads will disclose any information about a pupil to other members of staff on a need to know basis only. The staff will have due regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR) and will adhere to the golden rules for sharing information:

Golden Rules for Information Sharing

1. **Remember that the Data Protection Act is not a barrier to sharing information** but provides a framework to ensure that personal information about living persons is shared appropriately.
2. **If there are concerns that a child may be at risk of significant harm or an adult at risk of serious harm**, then it is your duty to follow the relevant procedures without delay. Seek advice if you are not sure what to do at any stage and ensure that the outcome of the discussion is recorded.
3. **Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
4. **Seek advice** if you are in any doubt, without disclosing the identity of the person where possible.
5. **Share with consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You should go ahead and share information without consent if, in your judgement, that lack of consent can be overridden in the public interest, or where a child is at risk of significant harm. You will need to base your judgement on the facts of the case.
6. **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
7. **Necessary, proportionate, relevant, accurate, timely and secure:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
8. **Keep a record** of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

St Luke's approach to working with parents/carers is one of transparency and honesty and the school's responsibility is to safeguard and promote the welfare of all the pupils in its care. The school aims to do this in partnership with its parents/carers. In most cases parents and carers will be informed when concerns are raised about the safety and welfare of their child. Parents and carers should be given the opportunity to address any concerns raised.

The school will make every effort will be made to inform parents and carers if a referral is to be made to an external agency. Where this has not been possible, and the welfare of the child is considered at risk, or where requesting consent is considered to put the child at further risk of imminent harm, information will be shared without consent. In such cases the Designated Safeguarding Leads, the Strategic Safeguarding Lead or the headteacher will seek advice from the Borough's Children's Social Services team.

At St. Luke's we will not allow fears about sharing information to stand in the way of the need to promote the welfare and protect the safety of children. If in any doubt about sharing information, staff should speak to the

designated safeguarding lead or a deputy. We understand our responsibilities to process personal information fairly and lawfully and to keep the information we hold safe and secure, but will not let that become a barrier to sharing information when the failure to do so would result in risk of harm.

Information sharing decisions will be recorded and Child protection information will be stored securely separate from the pupil's school file, both in confidential online systems and in hard copy. Child protection information is stored and handled in line with the school's Retention and Destruction Policy.

All staff and volunteers must understand that they have a professional responsibility to share information in order to safeguard pupils. This includes sharing any information with their line managers or the headteacher where their relationships and associations both within and outside of the workplace (including on line) may have implications for the safeguarding of children in school. It also includes sharing information with other agencies, where that is necessary to safeguard the child. 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.

St Luke's has developed effective links with other relevant agencies and co-operates as required with any enquiries regarding child protection issues. The school will notify relevant external agencies if:

- A child subject to a child protection plan is about to be excluded.
- There is an unexplained absence of a pupil who is subject to a child protection of more than two days from school.
- It has been agreed as part of any child protection plan or core group plan.

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.

50. 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 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.

66. 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.

Appendices

Appendix 1: Safeguarding Procedure for Staff

Appendix 2: Referral Route for Safeguarding Concerns

Appendix 3: Prevent Referral Route



Appendix 4: MAST poster

Appendix 5: LADO contact information

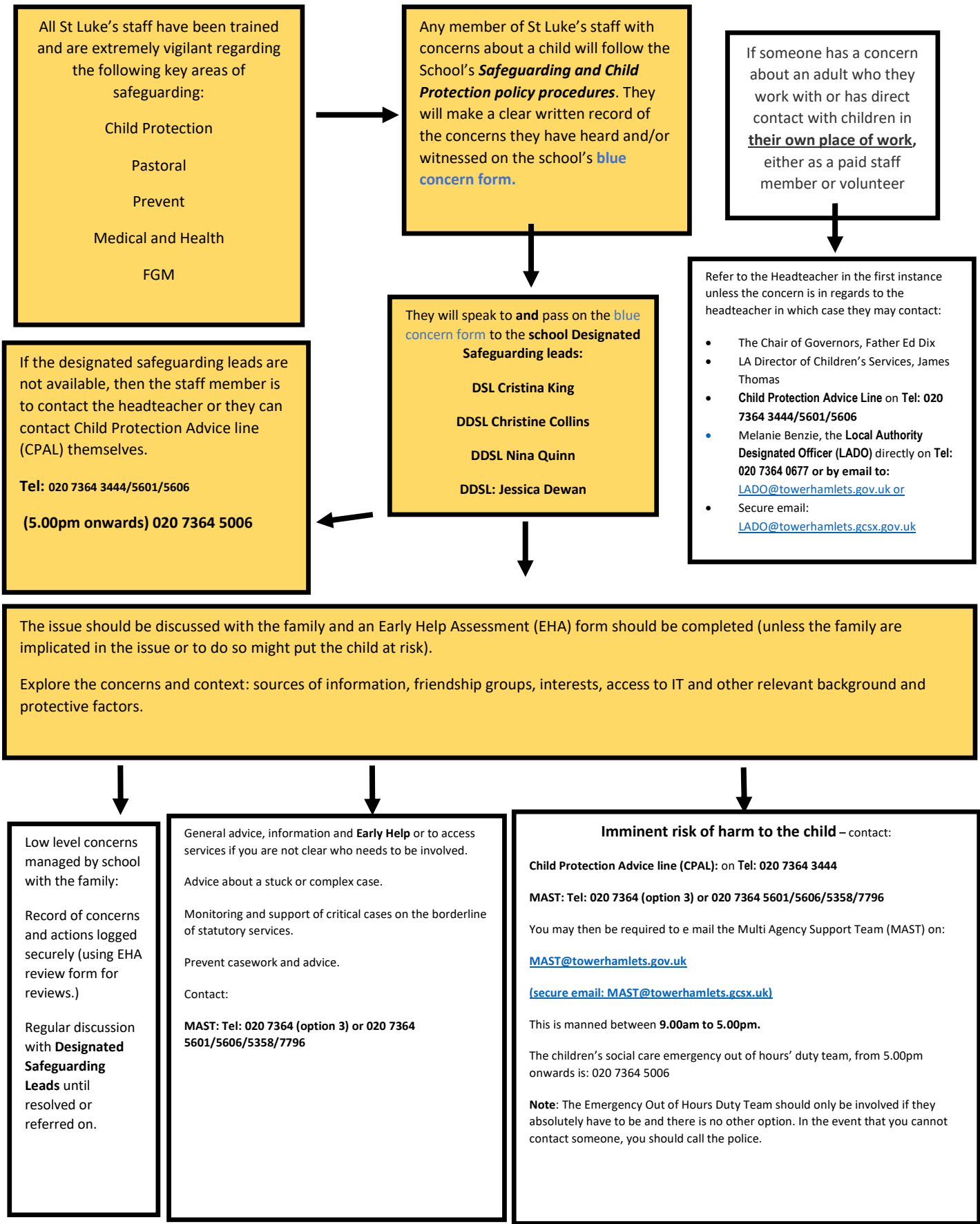
Appendix 6: School record of concern form

Appendix 7: [MAST Request for Support Form](#)

**St. Luke's C of E Primary School
Safeguarding Procedure for Staff. 2024.25**

Safeguarding Procedure	Additional information
<p>1) You have a safeguarding concern/a child has made a disclosure:</p> <p>You MUST complete a Blue Concern form.</p> 	<p>The Blue Concern form can be found in Teams. The file path is:</p> <p><i>All Staff/files/Blue Form Concern Form pro forma</i></p> <p>Complete and email it to the DSL (Designated Safeguarding Lead) or deputy DSL (Deputy Designated Safeguarding Lead) asap.</p>
<p>2) E-mail to:</p> <p>The Safeguarding Team safeguarding@stlukeslondon.org</p> <p>Emails are checked on a daily basis.</p> 	<p>If you have a Child Protection concern (i.e. the child is at imminent risk of harm), please contact the DSL/deputy DSL <i>immediately, as emails may not be checked until the end of the working day.</i> (It might be that the child should not go home.)</p> <p>Cristina King DSL: available 5 days a week, evenings and weekends</p> <p>Christine Collins DDSL: available weekdays</p> <p>Staff may make a referral to MAST themselves, but the DSL must be informed ASAP.</p> <p>MAST is the Multi-Agency Support Team and if you are concerned the child is at risk of harm, and you cannot speak to the DSL or DDSL, you must contact them directly on the Child Protection Advice Line: 020 7364 5006.</p>
<p>You will be advised of receipt of the blue form.</p> <p>Any other information provided will be on a need-to-know basis.</p>	
<p>DSL: Cristina King. Deputy DSL: Christine Collins. Other Team members are Jessica Dewan, our SENCO, Nina Quinn, Fiona Treasure, our Psychological Therapist and Absana Begum, our Safeguarding Admin Officer</p>	

Referral route for safeguarding concerns



Referral route for safeguarding concerns related to Radicalisation or Extremism

PREVENT

Any member of St Luke's staff with concerns about a child will follow the School's **Safeguarding and Child Protection policy procedures**. They will make a clear written record of the concerns they have heard and/or witnessed on the school's **blue concern form**.

If the designated safeguarding leads are not available, then the staff member is to contact:

Child Protection Advice line (CPAL)

Tel: 020 7364 3444/5601/5606

(5.00pm onwards) 020 7364 5006

They will speak to **and** pass on the blue concern form to the **School Designated Safeguarding leads:**

DSL Cristina King

DDSL Christine Collins

The issue should be discussed with the family and an early help Assessment (EHA) form should be completed (unless the family are implicated in the issue or to do so might put the child at risk).

Explore the concerns and context: sources of information, friendship groups, interests, access to IT and other relevant background and protective factors.

Low level concerns managed by school and family:

Record of concerns and actions logged securely (using EHA review form for reviews.)

Regular discussion with Designated Safeguarding Officer until resolved or referred on.

General advice, information and early help or to access services if you are not clear who needs to be involved.

Advice about a stuck or complex case.

Monitoring and support of critical cases on the borderline of statutory services.

Prevent casework and advice.

Contact:

MAST: Tel: 020 7364 (option 3) or 020 7364 5601/5606/5358/7796

Imminent risk of harm to the child – contact:

Child Protection Advice line (CPAL)/MASH:
on Tel: 020 7364 3444/5601/5606

You may then be required to e mail the Multi Agency Safeguarding Hub (MASH) on:

MAST@towerhamlets.gov.uk

(secure email:
MAST@towerhamlets.gcsx.uk)

This is manned between **9.00am to 5.00pm**.

The children's social care emergency out of hours' duty team, from 5.00pm onwards is: **020 7364 5006**

Note: The Emergency Out of Hours Duty Team should only be involved if they absolutely have to be and there is no other option. In the event that you cannot contact someone, you should call the police.

Imminent threat of harm to others – contact

Police 999

or Terrorist Hotline

0800 789 321

Multi-Agency Support Team (MAST)

020 7364 3444 / 5601 / 5606 / 5358 / 7796

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

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

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

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

Important contact information:

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

September 2024



MULTI – AGENCY SUPPORT TEAM (MAST)

**0207 364 3444
/ 5601 / 5606 /
5358 / 7796**

direct line 9.00am – 5.00pm weekdays
(not including public holidays)

Designated
Safeguarding
Lead:.....

Date:.....

LOCAL AUTHORITY DESIGNATED OFFICER FOR ALLEGATIONS (LADO)

Melanie Benzie

Tel: 020 7364 0677

Email: LADO@towerhamlets.gov.uk

September 2024

CONFIDENTIAL

School: Disclosure/incident/CP concerns

Date:		Name/Role of person completing form:	
Name of Child:		Name /Role of person child disclosed to:	

Details of disclosure by child/incident/CP concerns:

Action taken by person/s above:

Date of notification to CP lead/Deputy	Name of CP lead/Deputy
--	------------------------

Detail of decision/action by CP lead/deputy:			
Reasons for decision by CP lead/deputy:			
Notes/date re feedback to person raising child protection concern:			
Tick to confirm added to pupils chronology and placed in pupil's CP file:		Tick to confirm added to CP overview sheet:	
Date of review:			
Notes of review:			

