London Enterprise Academy

Safeguarding and Child Protection Policy 2026-27

Reviewed by: Naveed Hussain
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CONTENTS

1. CORE SAFEGUARDING PRINCIPLES 3

2. PURPOSE OF POLICY 4

3. SAFEGUARDING LEGISLATION AND GUIDANCE 5

4. TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP 5

5. LOCAL AUTHORITY STRATEGY 5

6. KEY DEFINITIONS 6

7. ROLES AND RESPONSIBILITIES 6

8. RIGHTS OF THE CHILD 9

9. CHILDREN WHO MAY BE POTENTIALLY MORE AT RISK OF HARM 10

10. CHILDREN IN NEED OF A SOCIAL WORKER 11

11. CHILDREN REQUIRING MENTAL HEALTH SUPPORT 11

12. LOOKED AFTER CHILDREN, PREVIOUSLY LOOKED AFTER CHILDREN & CHILDREN IN KINSHIP CARE ARRANGEMENTS 12

13. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES 13

14. CHILDREN WITH MEDICAL CONDITIONS 14

15. CHILDREN MISSING EDUCATION AND CHILDREN ABSENT FROM EDUCATION 14

16. ELECTIVE HOME EDUCATION 15

17. WHISTLEBLOWING 15

18. REPORTING OF ALLEGATIONS AGAINST STAFF & CONCERNS THAT DO NOT MEET THE HARM THRESHOLD 16

19. STAFF TRAINING INCLUDING TRAINING FOR GOVERNORS 17

20. VISITORS 18

21. VOLUNTEERS 18

22. ALTERNATIVE PROVISION PROVIDERS 19

23. EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS 19

24. IDENTIFYING ABUSE 20

25. INDICATORS OF ABUSE 20

26. VOICE OF THE CHILD 21

SAFEGUARDING ISSUES

27. CHILD SEXUAL EXPLOITATION 21

28. CHILD CRIMINAL EXPLOITATION INCLUDING COUNTY LINES 23

29. SERIOUS YOUTH VIOLENCE 24

30. ONLINE HARMS 24

31. DOMESTIC ABUSE 27

32. SO-CALLED HONOUR-BASED ABUSE 28

33. RADICALISATION AND EXTREMISM 29

34. CHILD-ON-CHILD ABUSE 30

35. CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT 33

36. YOUTH PRODUCED SEXUAL IMAGERY 36

37. BULLYING (INCLUDING CYBERBULLYING) 38

38. HOMELESSNESS 38

39. CHILDREN AND THE COURT SYSTEM 39

40. CHILDREN WITH FAMILY MEMBERS IN PRISON 39

41. PRIVATE FOSTERING 39

42. YOUNG CARERS 39

43. CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS 40

44. MODERN SLAVERY 41

45. TAKING SAFEGUARDING ACTION 41

46. EARLY HELP 41

47. HANDLING DISCLOSURES 42

48. CONFIDENTIALITY AND INFORMATION SHARING 43

49. REFERRING TO CHILDREN'S SOCIAL CARE 44

50. ESCALATION PROCEDURES 46

51. LEA SAFEGUARDING TEAM 49

1.0. London Enterprise Academy is a secondary free school in Tower Hamlets set up by serving teachers, professionals and local parents. Our vision is to create a truly outstanding free school delivering the very best educational opportunities, nurture academic excellence and enhanced ambition in all its pupils, inspire the next generation of professionals and entrepreneurs from diverse background

This Child Protection Policy is made available and accessible to staff, parents and visitors on the school website, shared drive. Reference is made to it in the staff handbook, during staff induction and staff training, Copies are emailed to staff both draft and approved versions. A copy is available in the school office and in the staff room and staff receive regular refresher courses on its contents during the school year.

Child protection Statement

This policy will be reviewed and approved at the school by the governing body at least annually unless an incident, new legislation or guidance calls for the need for a review. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils at LEA. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect, online harms attendance and alternative provision issues and exploitation and follow our procedures to ensure that children receive effective support, protection and justice.

Policy Statement

The procedures contained in this policy apply to all staff, volunteers, visitors and governors and are consistent with those of our local safeguarding partner arrangements. All the procedures have been written in accordance with Keeping Children Safe in Education and reflect local safeguarding arrangements including the Tower Hamlets Safeguarding Children Partnership Supplementary Guidance documents on Child Protection Procedures and the Management of Allegations as well as concerns that do not meet the harm threshold (See linked legislation and partnerships below).

This policy is one of a series in the school's integrated safeguarding portfolio. It should be read in conjunction with the following policies – Mental health and well-being policy, SEN/D policy, code of conduct and behaviour policy, staff conduct and on line safety policies.

1. **CORE SAFEGUARDING PRINCIPLES**
    - The welfare of the child is paramount and underpins all discussions, decision making, and actions taken at the school.
    - All concerns 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 Designated Safeguarding Lead will ensure that all pupils and staff involved in safeguarding and child protection issues will receive appropriate support.

These 6 core principles are embedded within the school's safeguarding arrangements i.e. it's safeguarding policies, procedures and systems; and underpin the whole school approach to safeguarding at London Enterprise Academy.

The headline tweaks

Theme	New detail
Forthcoming guidance	KCSIE now flags that revised Relationship, Sex and Health Education (RSHE) guidance and advice on gender-questioning pupils are expected this summer and will be signposted once published.
Online harms	The list of harms has been expanded to name misinformation, disinformation (including "fake news") and conspiracy theories.
Digital resilience	New links direct schools to the DfE's filtering-and-monitoring self-assessment tool, cybersecurity standards, and fresh guidance on using generative AI.
Attendance	*Working Together to Improve School Attendance* is now confirmed as statutory, reflecting the daily data-sharing duty introduced in 2024.
Virtual School Heads	Their non-statutory remit now explicitly includes promoting the educational achievement of children in kinship care.
Alternative Provision	Schools commissioning AP must secure written confirmation of safeguarding checks, maintain an up-to-date record of all sites attended, and review placements promptly if concerns arise.

2. PURPOSE OF POLICY

- To ensure all pupils on the school roll are effectively safeguarded including those pupils in Alternative Provision placements.
- To provide all staff with key information to enable them to identify safeguarding concerns and know what action to take in response.
- To ensure consistent good practice throughout the school.
- To demonstrate the school's commitment to safeguarding to the whole school community: pupils, parents/carers and other partners.

3. SAFEGUARDING LEGISLATION AND GUIDANCE

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

- Section 175 of the Education Act 2002
- The Education Regulations 2014
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguarding Children 2018 (Updated July 2022)
- Keeping Children Safe in Education (Latest)
- What to do if you're worried a child is being abused 2015
- UKCIS Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People (December 2020)
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014)
- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- Education and Training (Welfare of Children) Act 2021
- Human Rights Act 1998
- Data Protection Act 2018 and the GDPR

4. TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP SUPPLEMENTARY SAFEGUARDING GUIDANCE

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

- Working together to safeguard children 2023
- London Child Protection Procedures revised 8th Edition (London Safeguarding Children Board, 18th March 2026)
- Tower Hamlets Safeguarding Children Partnership Levels of Need Guidance (Sept).
- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Child Protection Procedures - September
- 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 (Sept)

5. TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP

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

London Enterprise Academy has been named as a 'relevant agency' and as such is under a statutory duty to co-operate with the THSCP arrangements. LEA will engage with the borough's Designated Safeguarding Lead Forums, co-operate with the Rapid Review process and any Local Learning Reviews,[1] participate in the THSCP multi-agency safeguarding training offer, and co-operate with the borough's Section 175/157 School Safeguarding Audit cycles, providing key information about children relevant to keeping children safe, participating fully in the Rapid Review process and Child Safeguarding Practice Reviews, and supporting the agreed safeguarding priority areas for -2027, which are Think Family and Adolescent Safeguarding.[2]

6. KEY DEFINITIONS

Safeguarding and promoting the welfare of children is:

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

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

Child includes everyone under the age of 18.

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

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

7. ROLES AND RESPONSIBILITIES

The Governing Body and Trustees 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 (latest Version), ensuring that the school's safeguarding policies and procedures, including the current Child Protection Policy, are compliant with

[1] For more information on the Rapid Review process, Local Learning Reviews and Child Death Reviews, Working Together 2018 Chapters 4 and 5 should be consulted. Working Together 2018 paragraphs 25-27 provide more information on the expectation of school's role within the safeguarding partnership arrangements.

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

legislation and statutory guidance, reflect local safeguarding arrangements and are effective for the education setting.

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

The Principal 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 (and the Deputy 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 **Ashid Ali, the Principal should be contacted when the DSL is not available.**

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

There will be a further follow up if the school has not received the safeguarding records for new pupils within the first 5 days of the pupil starting during standard and non-standard transition points, then the school will proactively reach out to the previous school for the transfer of safeguarding files.

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding Lead (DSL)	Naveed Hussain	Naveed.Hussain1@londonenterprisacademy.org 0207426 0746 - Extension 2016
Emergency School (Out of Hours/Holiday/Trips) Safe guarding Phone Line	Naveed Hussain	07887202428
Deputy DSL and Student Welfare Officer (Mon, Weds and Thursday).	Yesmin Begum	Yesmin.begum@londonenterpriseacademy.org 02074260746 - Extension 2006
The Principal and the Vice Principal are also DSL. All Heads of Learning are also Deputy DSLs	Ashraf Khan	Ashraf.khan@londonenterpriseacademy.org
SENDCO and Deputy DSL (Mon, Tues)	Ruma Begum	Ruma.begum@londonenterpriseacademy.org

Safeguarding Link Governor	Shah Muhmud	Email available on request
Local authority designated officer (LADO)	Melanie Benzie	lado@towerhamlets.gov.uk
Designated Prevent Officer	Iona Karrman-Bailey	Iona.Karrman-Bailey@towerhamlets.gov.uk. 07785718962
Chair of Governors	Nazim Ahmed	Email available on request
Channel Helpline		020 7340 7264

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

All staff have a responsibility to provide a safe environment in which children can learn.

All staff have a responsibility to report safeguarding concerns immediately to the DSL. Staff should also record all concerns on CPOMs before the end of the school day. In addition to this, staff should also send an email or call the school mobile to report concerns during the school holidays or after the school working day. The DSL can be contacted via email and through the school mobile phone during the holidays.
Staff who are on site running projects and holiday clubs should always follow the school protocol of reporting concerns. All members of staff take responsibility for writing up clear and comprehensive safeguarding on CPOMS. Through the DSL's oversight, safeguarding records include:

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

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

If in doubt about any safeguarding matter, staff should **always** speak to the DSL **and follow this up in writing via a written record on CPOMS.**

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

The school has robust arrangements to ensure safeguarding leadership is available during school hours and during out-of-hours activities. Appropriate systems are in place to enable safeguarding concerns to be received, monitored and responded to during periods when the DSL is unavailable.

8. RIGHTS OF THE CHILD

The school upholds the human rights of the child in accordance with the Human Rights Act 1998.[3] 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). **Further information can be found in the school's Equality and Inclusion policies respectively.** The school is committed to supporting and taking positive action towards children with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race- who may be at a disadvantage and be disproportionately vulnerable.

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

London Enterprise Academy supports pupils with protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. There are a plethora of activities to educate the school populace. This includes but not limited to age appropriate SMSC curriculum that promotes respect, equality and all the British Values. Students learn about their rights and respect through assemblies and advisory time. Teachers have also mapped out where and when these values can be taught. Student focus groups and student voice also ensure that all pupils within the school have a voice that is listened to. Child on child abuse is not tolerated in any shape and form and the school ensures that both victim and perpetrators are supported.

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.[4] 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.

[3] https://www.equalityhumanrights.com/en/human-rights
[4] https://chscp.org.uk/wp-content/uploads/2022/03/Child-Q-PUBLISHED-14-March-22.pdf

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.[5] The action plan recognises that schools have a powerful and significant role in changing narratives and bringing about social change through education. The school has taken the following steps to promote equality – mixed groupings, promoting cultures through cultural day. Celebrating achievements of communities and ethnic groups and challenging negativity and stereotyping are examples of what the school does to promote equality and diversity. Staff also engage with training from Global Learning London in order to foster a more inclusive, cohesive relationship by bringing young people together.

9. CHILDREN WHO MAY BE POTENTIALLY MORE AT RISK OF HARM

All staff should recognise that all children are vulnerable but that some children may be more vulnerable than others and at more risk of harm. Children known to a Social Worker, Looked After Children and Care Leavers may 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;
- 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 so-called honour based abuse such as Female Genital Mutilation or Forced Marriage;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues, parental incarceration and domestic abuse
- is misusing drugs or alcohol themselves;
- has returned home to their family from care; and
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day.
- is pregnant and/or is a parent themselves;

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

- has exhibited early signs of abusive, violent and/or harmful behaviours;
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit

Staff must be more vigilant in their day-to-day work with children when the above vulnerabilities are known and report all concerns immediately to the Designated Safeguarding Lead.

10. CHILDREN IN NEED OF A SOCIAL WORKER

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

When making decisions about safeguarding, carrying out risk analysis, making a safeguarding response to concerns such as unauthorised and persistent absence, and providing pastoral and academic support, the school will take seriously the fact that the child in need of a social worker will require enhanced pastoral and academic support alongside that provided by statutory services. London Enterprise Academy is also committed to providing further pastoral and academic support to children who have had historic contact with a Social Worker, in recognition that the abuse and trauma is likely to have an impact on the child beyond the duration of the involvement of statutory services. The school will co-operate with the 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 and in Kinship Care. Students with a social worker are tracked for progress, attendance and behaviour. Barriers to learning are identified and they are signposted to appropriate intervention both internally and externally

11. CHILDREN REQUIRING MENTAL HEALTH SUPPORT

All staff have an important role in supporting the mental well-being of children and to identify behaviour that may suggest a child is experiencing mental health problems. All staff 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 impact that trauma, bereavement, family adversity, domestic abuse, bullying, discrimination and other safeguarding concerns can have on a child's emotional wellbeing and mental health.

Staff should recognise that safeguarding concerns and mental health difficulties can often overlap and interact. Children experiencing mental health difficulties may be more vulnerable to safeguarding risks, whilst children who have experienced abuse, neglect, exploitation or trauma may present with emotional, behavioural or mental health needs. Early identification and appropriate support can help prevent concerns from escalating and promote positive outcomes for children.

Whilst all staff should be alert to behaviour, presentation and emotional responses that may indicate a child is experiencing difficulties with their mental health or wellbeing, only appropriately trained

professionals should attempt to make a diagnosis of a mental health condition. Concerns about a child's mental health should be discussed with the Designated Safeguarding Lead and considered alongside any other safeguarding information known about the child.

The school is committed to promoting positive mental health and emotional wellbeing through a whole-school approach. Appropriate support will be provided at the earliest opportunity, and where necessary the school will work in partnership with parents/carers and relevant agencies to ensure that support is coordinated and proportionate to the child's needs.

Any member of staff who is concerned about the mental health or wellbeing of a student should speak to the Head of Learning of the child in the first instance. If there is a fear that the student is in danger of immediate harm, then the normal child protection procedures should be followed with an immediate referral to DSL or the Principal. If the student presents a medical emergency then the normal procedures for medical emergencies should be followed, including alerting the first aid staff and contacting the emergency services if necessary. Where a referral to CAMHS is appropriate, this will be led and managed by the Student Welfare Officer in conjunction with the DSL. To support this, our Student Welfare Officer has Mental Health First Aid (MHFA) qualifications and the DSL will coordinate the support of the student in question.

12. Children Looked After (CLA), PREVIOUSLY LOOKED AFTER CHILDREN AND CHILDREN IN KINSHIP CARE ARRANGEMENTS

The most common reason for children becoming looked after is because of abuse including neglect. Staff need to have the skills, knowledge and understanding to safeguard Children Looked After (CLA) in recognition of their heightened vulnerability.

The DSL and Designated Teacher will work together alongside relevant agencies and take immediate action to safeguard and provide support to this vulnerable group of children.

The Academy's designated teacher for looked after, previously looked after children and children in kinship care (currently the DSL) will work with the virtual school head to monitor the child's attendance and welfare and discuss how funding can be best used to support the progress of the child and meet the needs identified in the child's personal education plan.

Staff need to be aware of the legal status of a looked after (and kinship care) child's care arrangements. In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after/kinship legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Naveed Hussain (DSL) is the Designated Teacher for the looked after children and he liaises extensively with the virtual school head and subject teachers in order to implement strategies to facilitate progress.

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

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

13. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

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

- Professionals and other adults making assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- The potential for children with SEN and disabilities or certain medical conditions being vulnerable to experiencing peer exclusion and isolation and being disproportionally impacted by behaviours such as bullying (including prejudice-based bullying), without outwardly showing any signs;
- Children not understanding that what is happening to them is abuse; and
- Communication barriers when reporting abuse and difficulties in overcoming these barriers.
- The need for intimate care or that these children are isolated from others and that these children are more likely to be dependent on adults for care, and
- Children with SEN and disabilities may have issues understanding the impact of their behaviour or the consequences they receive. They may be unable to understand the difference between fact and fiction in online content and then repeat the content/behaviours in school or college.

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

Further information on safeguarding SEND children is available in the non-statutory guidance Safeguarding Disabled Children (2009); NSPCC Safeguarding Children with Special Educational Needs

and Disabilities (May 2022), and NSPCC Safeguarding d/Deaf Children and Children who have disabilities at greater risk of abuse (June 2024). Staff should speak with the DSL and SENDCO in the first instance.

All staff are regularly trained to understand and be aware of the additional barriers that exist when safeguarding children with SEND. All staff need to be aware that 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.

Each child with SEND has an allocated key worker who meets with them regularly to support and provide appropriate guidance and to reinforce all key safeguarding messages. The school is committed to supporting and safeguards children with SEND including children who have physical health conditions. For instance all students with medical needs are on the medical register; these students have 1:1 meetings with the school nurse and their individual health care plans are shared with the relevant staff and agencies. Risk assessments are also in place for most of our vulnerable learners. Each teacher is given a pen portrait of the children with SEND with their strengths, weaknesses and area of need as well as strategies to support the learning and progress. There are clear referral process in place to facilitate appropriate intervention.

14. CHILDREN WITH MEDICAL CONDITIONS

Children with medical conditions may face additional safeguarding vulnerabilities, particularly where their condition affects communication, independence, emotional wellbeing or attendance. Staff should be mindful that safeguarding concerns may present differently and should work alongside health professionals and parents to support these children.

Children with medical conditions may be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school or where they are repeatedly sent without essential medication, thereby putting the individual at risk. In these cases, the school will take appropriate action and make referrals to the Children Social Care.

15. CHILDREN MISSING EDUCATION AND CHILDREN ABSENT FROM EDUCATION

The school closely monitors attendance, absence and exclusions. A child going missing from education is a potential indicator of abuse, neglect and exploitation, including child sexual abuse, child sexual exploitation, child criminal exploitation (county lines) or mental health problems. Staff should be alert to children already known to be vulnerable going missing from education especially Children known to a Social Worker and Children Looked After.

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

may increase known safeguarding risks within the family or in the community. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Our unauthorised absence procedures are as follows:

1. First Day Absence: the school will endeavour to telephone or text parent(s)/carer(s) on the first day of absence if we have not previously been contacted.
2. Second Day Absence: the school will endeavour to telephone or text parent(s)/carer(s) on the second day of absence if we have not previously been contacted. A standard letter is sent home and parents are asked to contact the school that day.
3. Third Day Absence: If a child is still away, a phone call will be made and a home visit will be conducted if the child is not in school by break time. A standard letter is sent home. Parents are asked in the letter to contact school that day.
4. Continuing Absence: If there has still been no contact from the parent/s there will be a home visit by our Student Welfare Officer. If the child is still absent, on the fifth day of absence, a home visit will be conducted.

We may ask our School's Liaison Officer to conduct a welfare call to the family home. The school might make a referral to the AWA (attendance and welfare office)r, social care and CME. The school will invite parent(s)/carer(s) in to discuss the situation with our Student Welfare Officer, Head of Learning and/or Assistant Principal if absences persist. When a pupil does not return to school and the whereabouts of the child and their family are not known after the school has made initial inquiries, the school refers such a child to the Local Authority using a Missing Children referral form.

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

16. ELECTIVE HOME EDUCATION

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

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

17. WHISTLEBLOWING

All staff members have a responsibility to raise concerns about poor or unsafe practice and potential failures in any aspect of the school's safeguarding arrangements and staff should feel confident that such concerns will be taken seriously by the senior leadership team. Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in avery difficult situation. They may worry that they have misunderstood the situation and they will

wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The school's whistleblowing policy is available on the staff shared drive and also on the school's website. All concerns of poor practice or possible child abuse by colleagues should be reported to theprincipal. **Complaints about the principal should be reported to the chair ofgovernors, chair of the management committee or proprietor**. **Staff can report directly to the LADO or the police, if they are concerned that the relationship between the principal and the Chair of governors might hinder the investigation.**

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action or if the child is in immediate danger.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, they should consider other channels available to employees as set out in Government's guidance on whistleblowing. To raise whistleblowing concerns externally school staff are advised to report to the Prescribed Bodies in the Government's List of Prescribed Bodies and Persons, which includes for safeguarding related concerns the NSPCC: Whistleblowing Advice Line 0800 028 0285 which is free & anonymous, more information can be found at nspcc.org.uk/whistleblowing.

18. REPORTING OF ALLEGATIONS AGAINST STAFF & CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

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

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

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

If the staff member feels that the allegation may not be investigated because of the relationship between the principal and the chair of governors. They must speak to the LADO in the first instance. On receipt of a report of an allegation, the principal will make immediate contact with the Local Authority Designated Officer for an initial discussion. If the allegation concerns the principal, then the Chair of Governors shall make contact with the LADO.

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

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

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

LBTH Local Authority Designated Officer (LADO): Melanie Benzie

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

Telephone: 0207364 0677

Concerns about staff that do not meet the harm threshold and the allegation criteria set out above are known as Low-Level Concerns. Staff should report low-level concerns and self-report low-level concerns about themselves in accordance with the school's procedures on low-level concerns, which are found in the school's Staff Code of Conduct. The staff code of conduct is emailed out to staff at the beginning of the academic year and it is saved in the staff shared folder under policies.

19. STAFF TRAINING INCLUDING TRAINING FOR GOVERNORS

In addition to School Staff, Governors and Trustees are required to have compulsory safeguarding training as part of their induction and to maintain their knowledge through regular safeguarding training and updates. Through regular safeguarding training and updates staff are given the relevant skills and knowledge to safeguard children effectively and governors/trustees will be empowered and equipped to provide strategic challenge and gain assurance that effective safeguarding arrangements in place.

Training: All training will be in line with advice from the 3 safeguarding partners. The key training elements provided to staff are as follows: Policy: Safeguarding Policy. All staff will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with the statutory relevant skills and knowledge to safeguard children effectively, including Prevent. All staff must complete an online assessment to demonstrate their understanding of the safeguarding training and the latest statutory KCSiE document. Certificates awarded are held on files

DSL Training – DSLs attend training every two years; and in addition to formal training, their knowledge and skills will be refreshed at regular intervals, at least annually.

Induction Training to mid phase staff – Mandatory within first week of starting date. All mid phase staff will receive the face to face training of the safeguarding procedures and must complete online safeguarding training along with an online assessment within 1 week of starting date.

Staff checklists/Declaration forms to be signed by all staff after reading and understanding safeguarding requirements (including parts 1, 5 and Annex A of KCSiE, and "Regulated activity in relation to children: scope")

Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process. Governors receive training about safeguarding annually and are invited to all safeguarding training given to staff. This is to allow them to have the knowledge and information needed to perform their functions and understand their responsibilities.

20. VISITORS

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. All visitors are expected to observe the school's safeguarding and health and safety regulations. They are issued with a safeguarding leaflet when they sign in to ensure they understand our policies and practices in keeping children safe. Visitors who do not have a DBS should be escorted or supervised while on site. Speakers are also vetted to ensure hate crime, radicalism and extremism are not promoted. The safeguarding lead and pastoral lead set up an initial meeting with the speakers to plan and preview the content. 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.

The school always considers the following points before agreeing for an external organisation to use the premises or hold an event at the school:

- The topic and purpose of the event
- Whether it would appropriate for our students (and the likelihood of students attending the event if held outside normal school hours)
- The reputation of the organisers and any speakers –we check the organisers' and any speakers' status and history by searching the internet, including social media
- Who might attend
- Any risks to our school's reputation and ethos
- The potential or likelihood that the visit will stir up hatred or incite violence
- The views of the community safety team, local police or local Prevent coordinator if you have any concerns.
- Visitors hiring the hall are limited to the use of the ground floor and basement with evening premises staff manning and supervising the designated spaces.
- All visitors sign in and out of the building

21. VOLUNTEERS

From September 2026, volunteers undertaking teaching, training, instruction or supervision of children frequently, on more than three days in a thirty-day period, or overnight, are engaged in

regulated activity and will require appropriate DBS checks, including children's barred list information where required.
Volunteers who are not undertaking regulated activity will be subject to a written risk assessment to determine the level of safeguarding checks required.

22. ALTERNATIVE PROVISION PROVIDERS

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

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

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

23. EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school, we will check that they have appropriate procedures in place, including safer recruitment procedures. When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

Where services or activities are provided separately by another organisation outside of normal school hours, the school will seek assurance that the organisation has effective safeguarding policies and procedures in place. This applies regardless of whether or not the children who attend any of these services or activities are pupils on the school register. The safeguarding standards expected of non-regulated external organisations are set out in the Department for Education's - After-School Clubs, Community Activities and Tuition: Safeguarding Advice for Providers (September 2023, Updated 29 May). 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.

24. IDENTIFYING ABUSE

Abuse, neglect and exploitation 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, serious youth violence, and abuse that occurs on digital and online platforms. All staff especially the DSL and Deputy DSLs must consider whether children are at risk of harm and exploitation in environments outside the family home. All staff should therefore apply a Contextual Safeguarding approach when safeguarding children in the setting.

25. INDICATORS OF ABUSE

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

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

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

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

from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate 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 toolkit and all staff should understand their important frontline role in identifying children who may be suffering from Neglect.

26. 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 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.

We use the following systems to enable the students at LEA to share their concerns (KCIE Part 2) should they feel they are not able to report a situation via the designated channel:

- Student council meetings
- Surveys
- Heads of Learning
- Learning Mentors
- School Welfare Officer
- School Counsellor
- Tell me email and tell me box
- The DSL and Deputy DSL

SAFEGUARDING ISSUES

27. CHILD SEXUAL EXPLOITATION

Child Sexual Exploitation is a form of child sexual abuse. CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who

have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery - https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims/modern-slavery-statutory-guidance-for-england-and-wales-under-s49-of-the-modern-slavery-act-2015-and-non-statutory-guidance-for-scotland-and-northe. Where a child is identified as a potential victim of CSE or CSE, a child protection and modern slavery referral will be made.
The victim may have been sexually exploited even if the sexual activity appears consensual. Apart from age other factors that could make a child more vulnerable to exploitation, include gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

CSE can include both physical and non-physical contacts including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities
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. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. 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;
- 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 is communicated through assemblies, PSHE, RSE and within lessons. At times, external organisations are invited to the school to deliver workshops. For further information Please read the
Home Office Statutory Guidance on Child Sexual Exploitation as well as speaking to the DSL. The Children's Society has provided useful guidance on Child Sexual Exploitation.

28. CHILD CRIMINAL EXPLOITATION INCLUDING COUNTY LINES

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

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

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

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

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

- 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 with incarcerated parents
- 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 'trap house' or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals. Metropolitan Police information leaflets raising awareness about Cuckooing are available from the council website in English, Bengali and Somali.

29. SERIOUS YOUTH VIOLENCE

All staff are aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. Children involved may be both victims and perpetrators of harm. School staff will consider whether involvement in serious violence forms part of a wider safeguarding concern.

30. ONLINE HARMS

Children should have the right to explore the digital environment but also the right to be safe when on it. However, technology often provides the platform that facilitates harm. 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 making/sharing, nudes and semi nudes.

Children should have the right to explore the digital environment but also the right to be safe when on it. However, technology often provides the platform that facilitates harm, and the use of technology has become a significant component of many safeguarding issues. Examples of which include child sexual exploitation; child criminal exploitation; radicalisation; sexual predation/grooming; and forms of child-on-child abuse such as cyberbullying and nudes and semi-nudes. The Online Safety Act 2023 among other things makes cyberflashing, threatening communications and the promotion of self-harm criminal offences. Artificial Intelligence is the current technological innovation evolving with speed, which will benefit society including the education sector but also generate great risks and challenges compromising the safety of children, for example, Generative Artificial Intelligence is being misused to create sexualised images and videos of children especially girls.

For more information please see the Internet Watch Foundation's Professionals Guide: Understanding and Responding to AI-Generated Child Sexual Abuse Material and the IWF's Report and Remove Tool that may be useful for pupils.

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

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

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

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

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

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

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

When there are concerns about a child in this area, staff should notify the DSL, who will consider referring the child into the Cyber Choices programme (cyberchoices.uk). 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.
- The effectiveness of filtering and monitoring systems will be formally reviewed at least annually by the senior leader responsible for filtering and monitoring, working alongside the DSL and IT support provider. Records of these reviews and checks will be maintained.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet their safeguarding needs.

We have ensured that appropriate filters and monitoring systems are in place to manage the content available to students, external people are not able to communicate with or contact our students. We also have an instant report available about the on line conduct of our learners. The above also applies to remote learning, students are only able to access their learning via the recommended platforms (LEA remote learning policy and the On-line safety policy (Resources are available on THESS's resources page and the THSCP's website).

London Enterprise Academy is committed to ensuring that Online Safety is a running an 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. Student use of mobile phones is not permitted on site. Staff and pupils sign the acceptable ICT use agreement. Please refer to this document and the on line safety policy. For further information, please see the school's ongoing risk assessment and review of Online Safety at the school.

In accordance with Department for Education's guidance, Mobile Phones in Schools (February 2026), the school prohibits the use of mobile/smart phones throughout the school day as set out in the Behaviour Policy. The school's Mobile Phone Policy forms part of the wider safeguarding framework and sets out expectations relating to pupils, staff and visitors concerning the safe and appropriate use of mobile devices.

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

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

31. DOMESTIC ABUSE

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse recognises that domestic abuse may occur in different types of relationships, including ex-partners and family member and is not restricted to the family home Domestic Abuse may involve a range of abusive behaviours which may be a single incident or a pattern of abuse including: physical, 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.

London Enterprise Academy 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. 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.

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

32. SO-CALLED HONOUR-BASED ABUSE

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of so-called Honour Based Abuse are abuse (regardless of the motivation) and should be handled and escalated as such. All staff need to be alert to the possibility of a child being at risk of Honoured Based Abuse, or already having suffered Honour Based Abuse.

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

Female Genital Mutilation

In England, Wales and Northern Ireland, FGM is a criminal offence under the Female Genital Mutilation Act 2003. For further guidance, please read: **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 marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk. For further guidance, please read **Forced Marriage Unit's Statutory Guidance and Multi Agency Guidelines the Right to Choose Updated April 2023]. Copies are in the staff room and the Designated Safeguard Lead's offices**

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 (August 2025).

33. RADICALISATION AND EXTREMISM

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

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a

child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

Statutory guidance on the Prevent duty, explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism. Paragraphs 57-76 pertain to schools.

As a school, we review annually our Prevent Risk Assessment and Prevent Checklists as part of our prevent duty. Some children are at risk of being radicalised: adopting beliefs and engaging in activities which areharmful, criminal or dangerous. Islamic extremism is the most widely publicised form. We also remain alert to the risk of radicalisation into white supremacy extremism where we have a minority of non-ethnic students. Staff and students are also made aware of the incel ideology.

School staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014).

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf

https://www.towerhamlets.gov.uk/lgnl/health social_care/children_and_family_care/keeping_children_safe.aspx

Tom Llewellyn-Jones - Tom.Llewellyn-jones@towerhamlets.gov.uk
Prevent, Hate Crime and Protective Security Programme Manager

In LBTH all Prevent related concerns should be referred through completing a National Referral Form (NRF) and sent to the Multi Agency Support Team and **Prevent.referrals@towerhamlets.gov.uk**

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

34. CHILD ON CHILD ABUSE (Including harassment and violence)

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

Child-on-child abuse is a safeguarding issue for both the child who has experienced harm and the child displaying the behaviour. It is preventable and may involve serious physical violence, threats, intimidation or the use of weapons.

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)
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse such as biting, hitting, kicking or hair pulling, or otherwise causing physical harm,
- physical assault and harm, or the threat of harm with a weapon,
- harmful sexual behaviour, sexual violence and sexual harassment including misogyny/misandry,
- 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 making or sharing of nudes and semi-nudes images and/or videos including those generated using AI,
- 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 or cause the victim humiliation, distress, or alarm. 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. This includes behaviours driven by misogyny, misandry and other forms of prejudice, discrimination or hostility

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

Although a child identifying as LGBTQ+ is not in itself a safeguarding concern, such children may be more vulnerable to forms of child-on-child abuse. This includes children who are perceived to be

LGBTQ+ even though they do not identify as such. The school is committed to providing a safe space for LGBTQ+ children to share any concerns they may have and in ensuring an inclusive culture is maintained. In the support that is provided to children questioning their gender, the school will adhere to any specific guidance issued by the Department for Education.

The school recognises that some children may not identify with the terms 'victim' or 'perpetrator'; therefore, careful consideration will be given to the language used when discussing incidents and support arrangements with children and their families.

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

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues can be prevalent when dealing with peer on peer abuse, for example girlsbeing sexually touched/assaulted or boys being subject to initiation/hazing type violence.

At our school, we take the following steps to minimise or prevent the risk of peer on peer abuse:

- An open and honest environment where young people feel safe to share information aboutanything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour andstressing the effects of bullying.
- RE and PSHE are used to reinforce the message through stories, role play, current affairs andother suitable activities.
- Staff will endeavour always to create surroundings where everyone feels confident and atease in school.
- We will ensure that the school is well supervised, especially in areas where children might bevulnerable.
- All child on child abuse cases are investigated, reported and recorded in Behaviour watch and CPOMs as appropriate (KCSIE Part 2).

Clear protocols for supporting victims, perpetrators and other children affected by child on child abuse obtain (KCSIE Part 2). All allegations of child on child abuse should be passed to the DSL immediately. They will beinvestigated and dealt with as follows (KCSIE Part 2).

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possibleto gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's socialcare to decide on next steps, which may include contacting the police.
- **Inform parents** - as with other concerns of abuse, the school will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil andso if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

Where allegations of sexual violence or sexual harassment are made, the school will act inaccordance with the guidance set out in Keeping Children Safe in Education *(202)*.

Supporting those involved

The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil that harmed. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intendedwill be addressed.

35. CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

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

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

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

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours;
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

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

Sexual violence offences are defined under the Sexual Offences Act 2003

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

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

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

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

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

All Staff need to be aware of the following:

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

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

Sexual Harassment

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, coercion and threats

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

Harmful Sexual Behaviours

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

LEA 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.

London Enterprise Academy will have regard to the guidance in part 5 of KCSIE when recording, reporting and risk assessing all aspects of disclosures and reports. The wishes of the victim and the need to protect the general student population are taken into account as well as the need to provide an ongoing response and support to victims collaborating with the local authority safeguarding team and/or the police. Lucy Faithfull Foundation's Shore Space resource is useful for teenagers worried about sexual behaviours. To support its overall prevention of and response to harmful sexual behaviours the school will give consideration to the best practice resources such as that available through the Contextual Safeguarding Program in particular the Beyond Referrals Toolkit: Harmful Sexual Behaviours.

All staff are aware that children can abuse other children, and that it can happen both inside and outside of school or college and online. Staff will recognise the indicators and signs of possible child on child abuse and know how to identify it and respond to reports.

Exclusionary behaviour can include intimidating, isolating or excluding a person from a group; the college recognises that SEND students may be particularly vulnerable to peer group isolation or bullying (including prejudice-based bullying) than other children. The college also recognises the gendered nature of child on child abuse; that girls are more likely to be the victim and boys the perpetrators. The school's policy is to offer support to victims, perpetrators and any other children affected by child on child abuse. We will do this via our counselling support services, support from teachers, learning mentors and SWIS and external agencies where appropriate. Perpetrators will be supported to reflect and change their behaviour. This may include clear instructions and a school sanction. The school will ensure that the perpetrator knows what the problem behaviour is, that it is wrong and harms others. This behaviour is taken seriously and will not be tolerated. All staff should understand, that even if there are no reports in the school does not mean it is not happening: it may be the case that it is just not being reported. As such, it is important that staff having any concerns regarding child on child abuse speak to the DSL, Naveed Hussain or to the Deputy DSL, Yesmin Begum. Staff receiving disclosures from students should do so according to the steps for disclosures set out in this policy and reported immediately to the DSL or the deputy DSL. All staff must understand the importance of challenging inappropriate behaviours between children that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

36. YOUTH PRODUCED SEXUAL IMAGERY

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

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

Incidents may also occur where:

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

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

Nude and semi-nude images may also be digitally altered or wholly generated through artificial intelligence technologies, including so-called 'deepfake' or 'deep nude' images. Such images should be treated as safeguarding concerns and responded to in accordance with KCSIE 2026 and relevant UKCIS guidance.

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

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with theyoung people involved.
- Parents will be informed at an early stage and involved in the process unless there is goodreason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made.

Staff responsibilities when responding to an incident - If you are made aware of an incident involving sexting (also known as 'youth produced sexualimagery'), you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If youhave already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery(this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves ortheir, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident, and reassure the pupil(s) that theywill receive support and help from the DSL.
- Initial review meeting
- Following a report of an incident, the DSL will hold an initial review meeting with appropriateschool staff. This meeting will consider the initial evidence and aim to

determine:

- Whether there is an immediate risk to pupil(s).

If a referral needs to be made to the police and/or children's social care

- If it is necessary to view the imagery in order to safeguard the young person (in most cases,imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or onlineservices
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should beinvolved)
- The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, orif there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which areunusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

37. BULLYING (INCLUDING CYBERBULLYING)

Bullying is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the school's Anti-Bullying Policy/Pupil Behaviour Policy/child on child Abuse Policy in accordance with Keeping Children Safe in Education and Behaviour in Schools. Advice for Head teacher and School Staff (September 2022). When dealing with Cyber/Bullying, staff must also have regard to the LEA Behaviour Policy, take prompt action, record all incidents in Behaviour Watch or CPOMS as appropriate, and verify that there has been a resolution or referral.

38. HOMELESSNESS

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

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

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

39. CHILDREN AND THE COURT SYSTEM

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

40. CHILDREN WITH FAMILY MEMBERS IN PRISON

Approximately 310,000 children in England and Wales have a parent sent to prison each year. 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 National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children

41. PRIVATE FOSTERING

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

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

42. YOUNG CARERS

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

- A long-term illness or condition

- A physical or learning disability
- A substance misuse 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 or 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.

No young carer or young adult carer should take on caring roles which are inappropriate, excessive, or which negatively impact their life opportunities, health or wellbeing.

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

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

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

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

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

43. CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

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

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

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

44. MODERN SLAVERY

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Child Sexual Exploitation may be committed by an individual or organised network. Victims may identify as belonging to the group exploiting them and may not recognise themselves as victims.

Child Criminal Exploitation may constitute modern slavery. Children who have been criminally exploited may commit offences while under coercion and should be recognised primarily as victims.

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

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

45. TAKING SAFEGUARDING ACTION

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

- In an emergency take the action necessary to help the child (including calling 999)
- Report your concern as soon as possible to the DSL, no later than the end of the day by 4.30pm. If it is after school hours please call the DSL on the following number 07887202428 School emergency number contact. Do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Complete a record of concern on CPOMs by the end of the day
- Seek support for yourself if you are distressed.

46. EARLY HELP

All staff are trained and prepared to identify children who may benefit from Early Help, which is providing support as soon as a problem emerges at any point in a child's life.

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

All staff need to recognise that all children may benefit from Early Help at any point in their childhood, but some children may benefit from Early Help more than others. These are children with known vulnerabilities, which are listed on page 9 of this policy. LEA staff are alert to the potential need for Early Help for children who have experienced multiple suspensions, at risk of being of being permanently excluded from school and in alternative provision or a PRU.

The school recognises that support may be provided through universal services, community-based early help services and targeted Family Help arrangements. The DSL will work with relevant partners to ensure children and families receive the right support at the right time.

Where needs cannot be met through universal or community-based support alone, the DSL may work with partner agencies to access Family Help services. The school will contribute information to assessments, planning and reviews and will continue to support the child throughout any Family Help intervention.

At LEA, we draw on the expertise of our Social worker in school who will signpost both parents and teachers to where and how to get support for the student should the need arise. We have robust internal pastoral support systems, use of Early Help Assessment, EHA Reviews and Team Around the Child/Family meetings when there is a multi-agency approach, and referral to Children's Social Care if the threshold has been met.

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

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

Alternatively, the DSL will complete an Early Help Enquiry form which can be accessed via https://bit.ly/2AA2WNy

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

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

Child Protection Advice Line
020 7364 3444

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

47. HANDLING DISCLOSURES

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

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

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

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

Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively, and the DSL will contact the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

48. CONFIDENTIALITY AND SHARING INFORMATION

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Serious Case Reviews have highlighted failures in safeguarding systems in which people did not share information at the earliest opportunity or did not share at all. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

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

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

Staff will have due regard to the Data protection legislation including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 to ensure that personal information is processed fairly and lawfully and they will adhere to the seven golden rules for sharing information. Information sharing will take place in a timely and secure manner.

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. Staff should recognise that timely and proportionate information sharing supports effective safeguarding practice and must not be delayed through concerns about data protection legislation where there is a safeguarding need. 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.

[When it is not possible to gain consent and when to do so would put the child at further risk of harm, the referral should be made and reasons for no consent must be stated.]
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.

49. REFERRING TO CHILDREN'S SOCIAL CARE

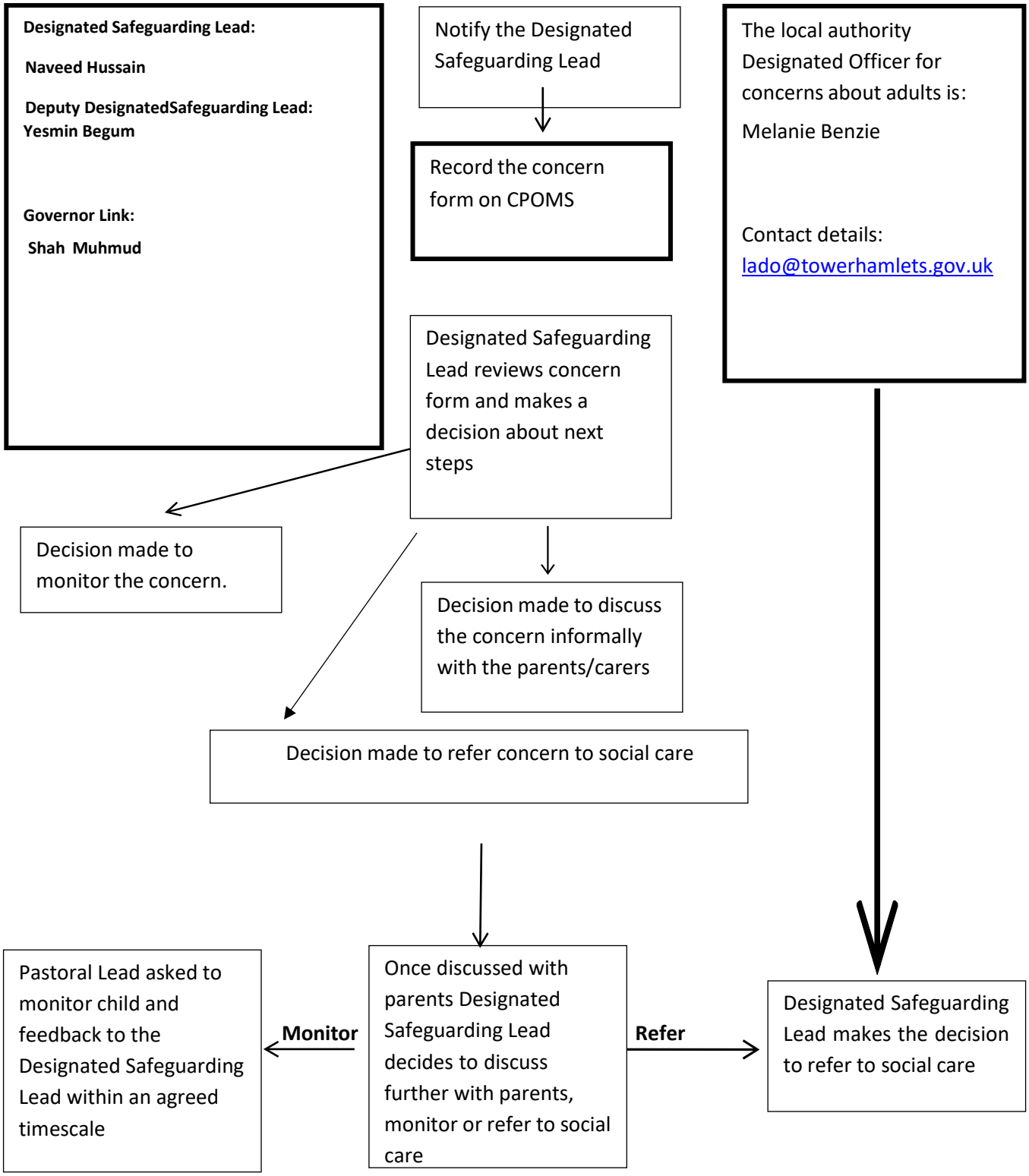
The DSL will make a referral to children's social care applying the LBTH Threshold Guidance if it is believed that a pupil is suffering or is at risk of suffering significant harm, or the child is considered to be in need, that is a child who is unlikely to achieve or maintain a reasonable level of health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

LBTH Multi-Agency 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 with the allocated Social Worker.

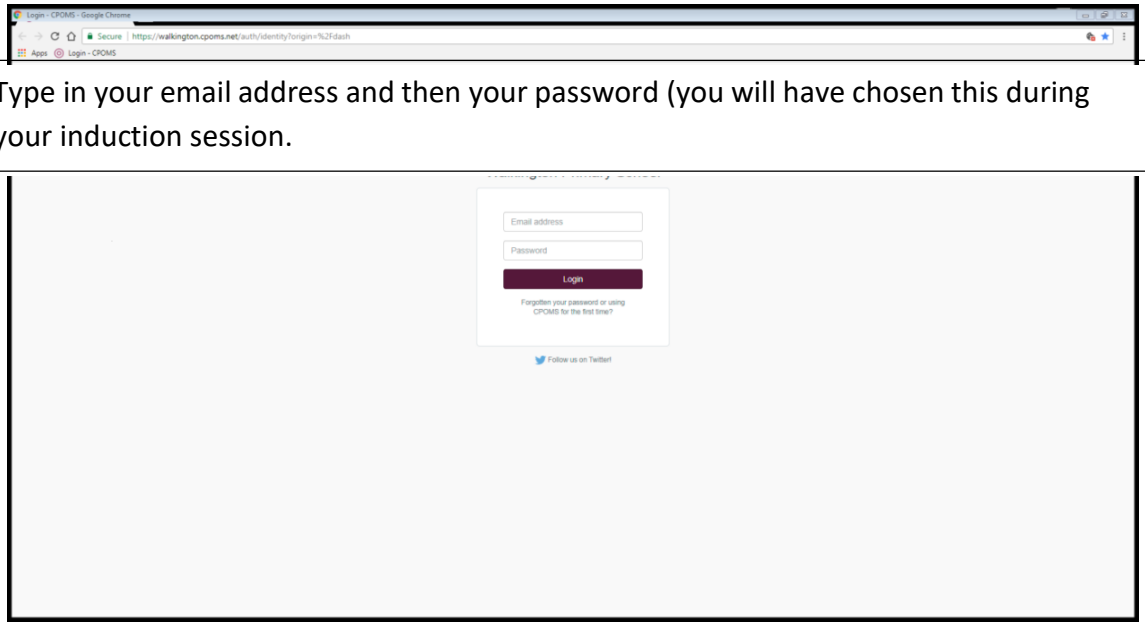
FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



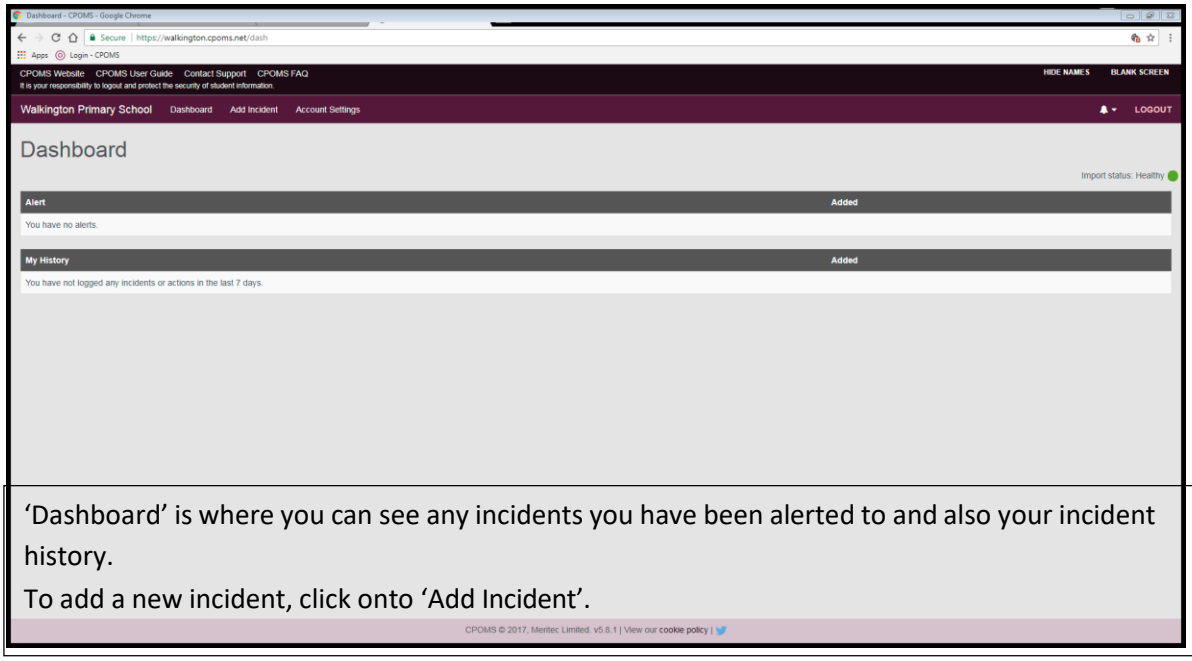
50. ESCALATION PROCEDURES

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.

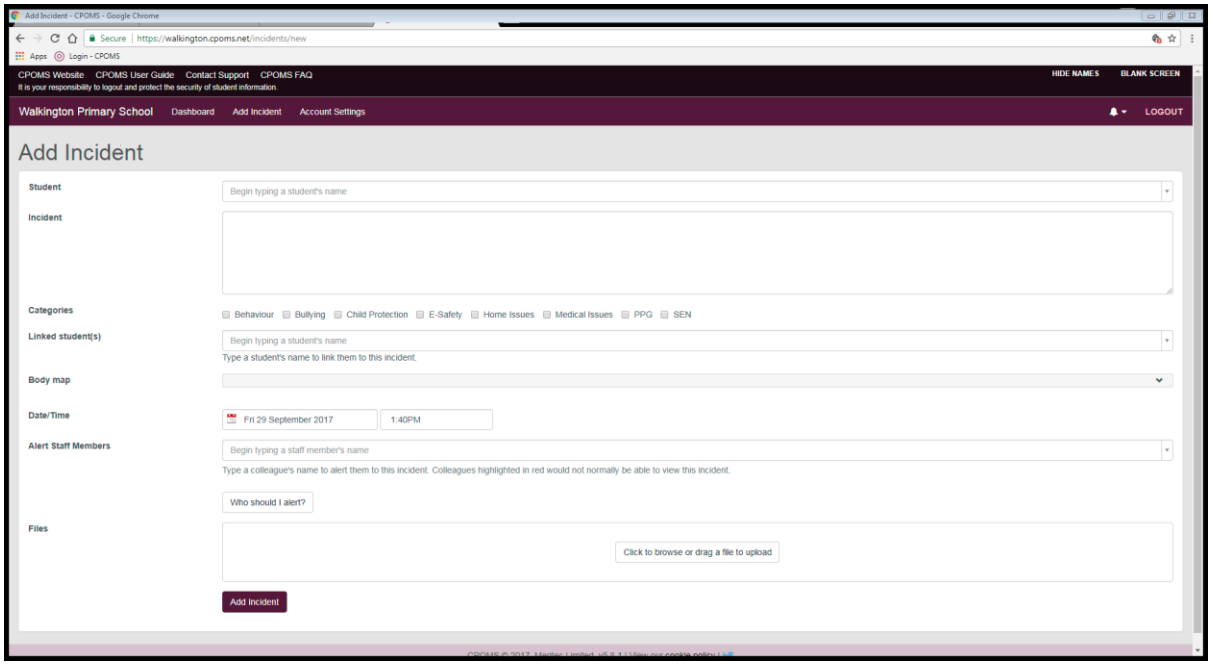


Type in your email address and then your password (you will have chosen this during your induction session.



'Dashboard' is where you can see any incidents you have been alerted to and also your incident history.

To add a new incident, click onto 'Add Incident'.

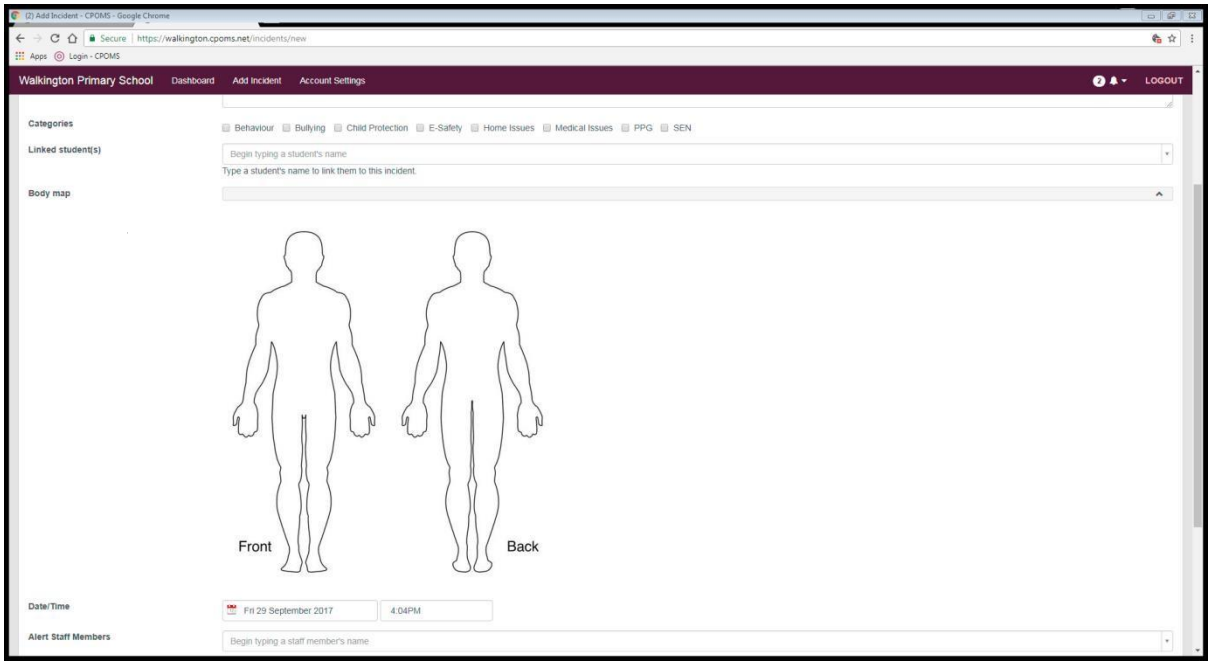


To add an incident you first need to find the student involved. To do this, begin typing their name in the student section. All students with that name will appear, including their surname and which class they are in. When you have found the correct student, click on their name.

In the incident box, type a detailed report of what has happened. Please try and avoid adding any personal opinions and just keep to the facts.

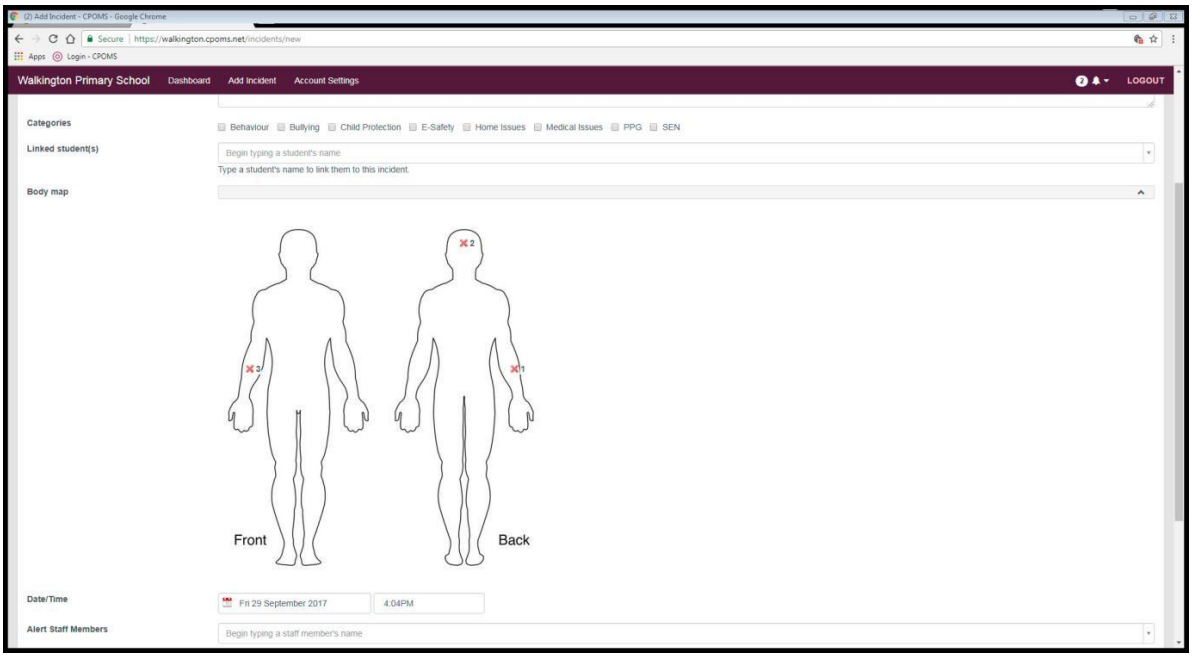
Choose a category that you believe the incident fits into.

If there are any other children involved in the incident, you can add them using the 'Linked Student' section. This works in the same way as when you are searching for a student.



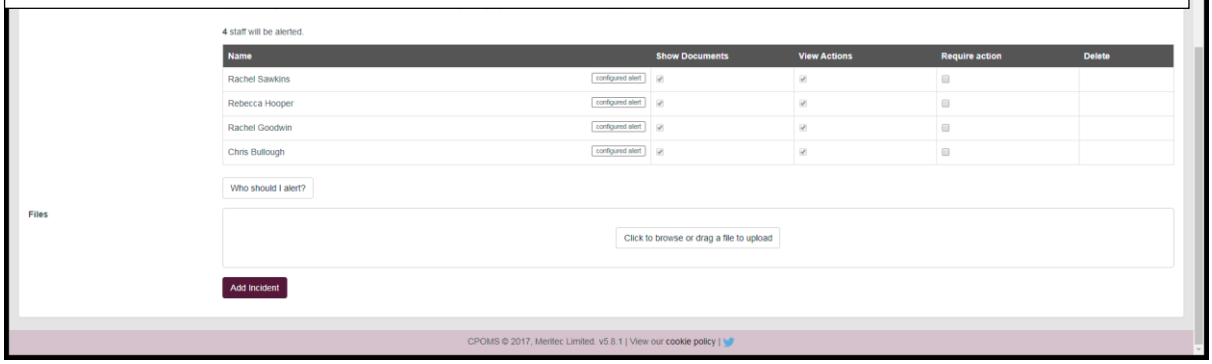
Depending on the type of incident you are reporting you may need to use a 'Body Map' to record and marks/injuries.

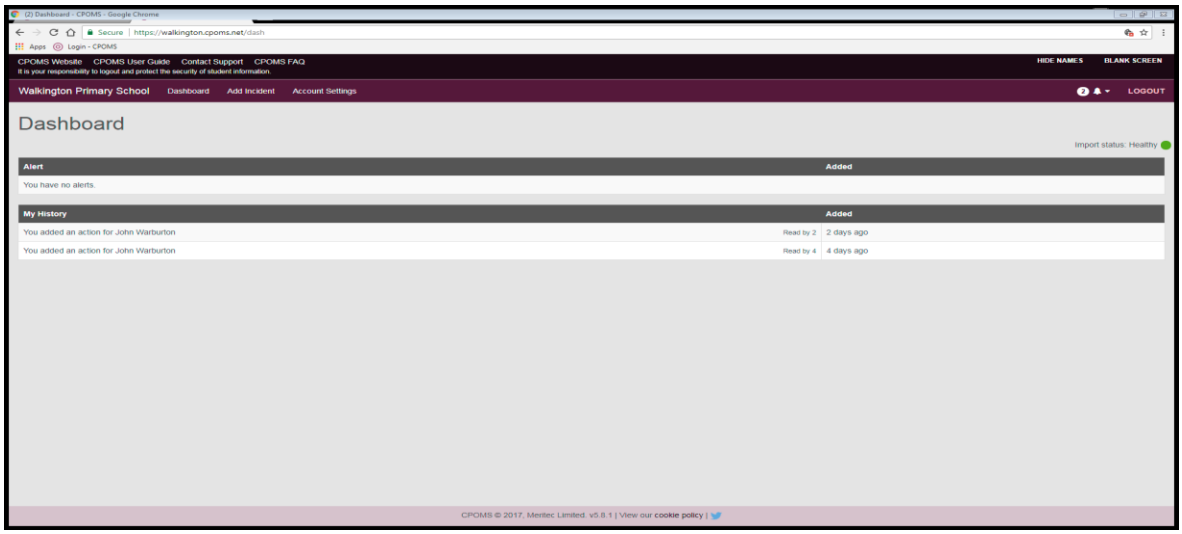
Hover the mouse over the area where the mark/injury has been identified and then click the left mouse button. A red cross will appear.



The DSL (Designated Safeguarding Lead) and all other appropriate staff will automatically be alerted to the incident.

Once you have checked through your report, press 'Add Incident'. Your report will then be complete.





51. LEA SAFEGUARDING TEAM

Naveed Hussain	Assistant Principal - Designated Safeguarding Lead
Yesmin Begum	Student Welfare Advisor - Deputy Designated Safeguarding Lead
Ashraf Khan	Vice Principal - Deputy Designated Safeguarding Lead
Ashid Ali	Principal - Deputy Designated Safeguarding Lead