



## **Child Protection Policy**

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## **Ethos and Values**

The safeguarding of children is a joint responsibility for all staff (including volunteers, visitors, students and governors) working in the school, therefore this policy applies to all. All procedures have been written in accordance with [Keeping Children Safe in Education 2024](#) and reflect local safeguarding arrangements including the Tower Hamlets Safeguarding Children Partnership Supplementary Guidance documents on Child Protection Procedures and the Management of Allegations and Concerns that do not meet the Harm Threshold.

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

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

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

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

## **Core Safeguarding Principles**

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

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

## 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.

## Safeguarding Legislation and Guidance

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

- Section 175 of the Education Act 2002 (Local maintained schools only)
- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- Human Rights Act 1998
- The Equality Act 2010
- Data Protection Act 2018 and the GDPR
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2023 (HM Government December 2023, Updated 23<sup>rd</sup> February 2024)
- Keeping Children Safe in Education 2024 (Department for Education, 2<sup>nd</sup> September 2024)
- Information Sharing: advice for practitioners providing safeguarding services (Department for Education, May 2024)
- What to do if you're worried a child is being abused 2015 (Department for Education, March 2015)
- Early Years Foundation Stage Statutory Framework (4<sup>th</sup> January 2024)
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014)
- The Teacher Standards 2012

## Tower Hamlets Safeguarding Children Partnership Supplementary Safeguarding Guidance

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

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

- Tower Hamlets SCP Multi-Agency Escalation and Resolution Policy

## 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](#).

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

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

## 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.

## Roles and Responsibilities

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

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

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

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

Contact details for persons relating to safeguarding can be found in [appendix 2](#).

When the leading DSL is not available, two Deputy DSLs can be contacted instead. If neither the DSL or Deputy DSLs are available, then speak to the Headteacher for further guidance.

When the school is closed (during any holiday period), the DSL and Headteacher check their school email accounts daily and will respond as appropriate.

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, see [appendix 2](#) for further information. All necessary information, regarding a concern, is stored securely on CPOMS. Note, where a concern could mean a child is at risk, the DSL must be spoken to verbally - as soon as possible. If the DSL cannot be reached, then the Deputy DSLs must be contacted. If the Deputy DSLs are not available the Headteacher must be contacted.

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

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

## Rights of a Child

The school upholds the Human Rights of the child in accordance with the Human Rights Act 1998. 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), see [Equality Policy and Accessibility Plan](#). The school is committed to supporting and taking positive action towards children with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race-who may be at a disadvantage and be disproportionately vulnerable.

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

At Stepney Park Primary School, we follow the United Nations Convention on the Rights of the Child as part of the rationale for our PSHEE curriculum. Through this curriculum, which includes children from EYFS to Year 6, the students are taught about the importance of the Protected Characteristics - including units on race, disability and gender as well as the Stepney Park Values (respect, resilience and independence). The school behaviour policy gives clear guidance on what is and is not acceptable behaviour with the appropriate process that would follow an incident. Where appropriate, the school works alongside outside agencies to seek advice (for example, Phoenix Outreach for children with ASD).

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

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

At Stepney Park Primary School, one of our values is 'respect'. This is broken down into the learning behaviour that children are taught and expected to promote - in particular through 'empathy' and 'responsibility'. These values are repeated in different aspects of the curriculum and school activities. For example, through PSHEE, the children learn about some of the Protected Characteristics (including race) as well as covering these topics in assemblies.

## Children Who May be Potentially More at Risk of Harm

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

Staff need to be aware that other children who may be potentially more at risk of harm include a child who:

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

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

## Children in Need of a Social Worker

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

When making decisions about safeguarding, carrying out a risk analysis, making a safeguarding response to concerns such as unauthorised and persistent absence, and providing pastoral and academic support, the school will take seriously the fact that the child in need of a social worker will require enhanced pastoral and academic support alongside that provided by statutory services. School is also committed to providing further pastoral and academic support to children who have had historic contact with a Social Worker, in recognition that the abuse and trauma is likely to have an impact on the child beyond the duration of the involvement of statutory services. The school will co-operate with the Tower Hamlets Virtual School, which now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children known to a social worker.



At Stepney Park Primary School, the DSL will be the main point of contact for any social worker (where a Social Worker is needed on the grounds of safeguarding). Where appropriate, the DSL will speak to other members of staff to collate information and share with the Social Worker as appropriate. The DSL will also be the main point of contact for the Virtual School. The wider school staff will only be aware of a social workers involvement on a need to know basis.

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

At Stepney Park Primary School, the DSL is also the Senior Mental Health Lead (see [appendix 2](#)). If appropriate, a referral will be made to support children in a number of ways: Emotional Literacy Support Assistants (ELSA), a school counsellor and Educational Psychologists. In addition, referrals to Tower Hamlets CAMHS can be made.

## **Looked After Children and Previously Looked After Children**

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

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

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

At Stepney Park Primary School, the DSL will also be the Designated Teacher. Regular meetings will be held with the Virtual School Headteacher to ensure the child is safe, supported and is promoting their educational outcomes. The school will utilise the PCT (or other professionals) to have regular welfare conversation with the child(ren) as well as the DSL attending all meetings (Core Group, etc.) whilst updating professionals in the wider network as appropriate.

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

## **SEND Children**

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

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

For some disabled children, their dependency on parents and carers for practical assistance in daily living, including intimate personal care, may increase their risk of exposure to abusive behaviour. Some children may also have an impaired capacity to resist or avoid abuse. Looked After Disabled Children may be particularly susceptible to possible abuse because of their additional dependency on residential and hospital staff for day-to-day physical care needs.

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

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

At Stepney Park Primary School, we tailor our staff CPD to the needs of the children. Specific training for our staff who work with SEND children and children with health conditions means we can be vigilant and understand changes in behaviour that may be a concern - especially where children are non-verbal. Regular pupil progress meetings are held across the year where class teachers discuss particular children with an assistant headteacher who can then refer to the SENDCO for advice and/or support as necessary.

## **Children Absent from Education & Children Missing Education**

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

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

Stepney Park Primary School's policy, in relation to absences and attendance can be accessed on the school website.

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

Contact:

LBTH CME Officer, Tower Hamlets Education Safeguarding Service,  
[Nasihah.Anwer@towerhamlets.gov.uk](mailto:Nasihah.Anwer@towerhamlets.gov.uk) 020 7364 3426 / 07562 431 817

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

## **Elective Home Education**

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

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

## **Whistleblowing**

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

Stepney Park Primary School's Whistleblowing Policy is on the school website.

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

The NSPCC Whistleblowing Advice Line 0800 028 0285 which is free & anonymous, more information can be found at [nspcc.org.uk/whistleblowing](https://www.nspcc.org.uk/whistleblowing).

## **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 2024 Part 4 and the THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – September 2024](#)

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

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

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

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

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

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

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

**LBTH Local Authority Designated Officer (LADO):** Melanie Benzie

**Email:** [Melanie.Benzie@towerhamlets.gov.uk](mailto:Melanie.Benzie@towerhamlets.gov.uk) or [LADO@towerhamlets.gov.uk](mailto:LADO@towerhamlets.gov.uk)

**Telephone:** 0207364 0677

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

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

Stepney Park Primary School's Staff Code of Conduct can be found on the Staff Drive, which references concerns that do not meet the harm threshold.

Stepney Park Primary School also follows a [Touch Protocol](#). The document outlines appropriate physical contact with children in our care.

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

## **Staff Safeguarding Training Including Training for Governors**

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

At the beginning of each academic year, all current staff receive statutory safeguard training. This includes:

- Reading KCSIE 2024, Part 1
- Contextualised safeguarding information regarding Stepney Park Primary School, including the contents of the SPPS Child Protection Policy and the KCSIE updates for that year
- Completing The Key, safeguarding the essentials 2024 online training

Any staff that missed the training, or joined the school later, are given an induction which includes safeguard training and they are asked to complete The Key online training.

Throughout the year, the DSL delivers regular training. This includes:

- 1 minute safeguarding CPD in morning briefings
- longer discussion/scenario based safeguarding situations
- guest speakers
- incidental training/updates as necessary
- individual/small group CPD, often regarding a child (or group of children)

Where a staff member misses a training session, the CPD is available to them on the school drive and the DSL can talk them through the information if necessary.

School governors receive online training by an accredited provider as well as an invitation to meet the DSL and discuss the safeguarding procedures. This takes place every year at Stepney Park Primary School.

## **Visitors**

Visitors who come to Stepney Park Primary School are subject to a Visitor's Risk Assessment (accessed on the School Drive) where details of the individual(s) are recorded alongside checks that have taken place, whether the DBS has been seen and the procedure for dealing with unwarranted behaviour.

When a Social Worker, Police Officer or another professional visits the school to meet with a child as part of statutory investigations or other work, the ultimate safeguarding responsibility remains with the

school. The school is aware of the need for the child to have an appropriate adult when interviewed by the Police in accordance with the [PACE Code C statutory guidance](#).

## Extended School and Off-Site Arrangements

Stepney Park Primary School records any overnight activities on Evolve, this replaces the regular off-site activities Risk Assessment. There will always be a member of the Senior Leadership Team available throughout the overnight stay.

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, ~~when they are not currently regulated,~~ are set out in the Department for Education's Keeping Children Safe during community activities, after school-clubs and tuition: non-statutory guidance for providers running out-of-school activities (April 2022). The school will ensure 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.

Stepney Park Primary School's Educational Visits Policy can be found on the school website.

## Identifying Abuse

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

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

## Indicators of Abuse

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

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

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

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

The DSL is aware of the borough's [LBTH Neglect Guidance](#) toolkit and all school staff understand their important frontline role in identifying children who may be suffering from Neglect.

## **Voice of the Child**

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

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

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

Staff need to be aware of and promote the systems in place at the school which enable children to share their concerns and report abuse confidently. 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.

Through the PSHE curriculum, Stepney Park Primary School teaches the children to know they have Trusted Adults at school - that these adults may change as they get different teachers - but ultimately that every adult at school is a Trusted Adult. A Trusted Adult is someone they can talk to if they are worried or concerned about anything. For children who have already been identified as vulnerable, support is already in place through ELSA, school counsellor and an Educational Psychologist. As part of our regular monitoring, Pupil Voice will gather information regarding safeguarding and allow children to talk confidently about any concerns they may have.

## Safeguarding Issues

### Child Sexual Exploitation

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

CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

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

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

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

Through PSHE and repeated in the RSE curriculum, children are taught about their personal, physical privacy through the NSPCC Pants Rule. This is taught at the beginning of each academic year and repeated during the RSE curriculum as well as assemblies and incidentally, when appropriate.

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

### Child Criminal Exploitation 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 who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

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

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

- go missing from education and/or home and subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);

- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘traphouse or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office and The Children’s Society [County Lines Toolkit For Professionals](#).

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

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

### **Serious Youth Violence**

All staff are aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

### **Online Harms**

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

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

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

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

- Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racism, prejudice-based content, misogyny, 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/>).

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](http://cyberchoices.uk)), which provides early intervention where children are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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

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

Stepney Park Primary School uses Home Protect, provided by LGfL, to filter internet usage whilst on the school's network and whilst logged into a school owned Google account. SENSO, provided by LGfL, is used to monitor internet activity and alerts members of SLT when children and (potentially) accessing inappropriate material on the school's internet. Every half-term, the school tests the effectiveness of the internet filtering through <https://testfiltering.com/>.

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

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

Stepney Park Primary School's Internet, E-Safety and Social Media Policy can be found on the school's website, along with Behaviour and Anti-Bullying Policy and the school's Acceptable User Policies for staff and pupils is available on the school Drive.

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

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

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

### **Domestic Abuse**

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

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

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

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

### **So-Called Honour-Based Abuse**

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of

preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of so-called Honour Based Abuse are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of Honour Based Abuse, or already having suffered Honour Based Abuse.

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

### **Female Genital Mutilation**

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

Stepney Park Primary School references [HM Government Multi-Agency Statutory Guidance on FGM](#), Updated 30<sup>th</sup> July 2020.

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

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

### **Forced Marriage**

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

School and college staff should contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufcdo.gov.uk](mailto:fmufcdo.gov.uk).

Stepney Park Primary School references the Forced Marriage Unit's Statutory Guidance and Multi Agency Guidelines [The Right to Choose](#) Updated June 2022.

## Virginity Testing and Hymenoplasty

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

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

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

## 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).

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

At Stepney Park Primary School we regularly complete and review our Prevent Risk Assessment and Prevent Checklists as part of our Prevent Duty.

Through our Religious Education, PSHEE curriculum and programme of assemblies, children are able to discuss issues of religion, ethnicity and culture. These are also an opportunity to promote fundamental British Values as part of SMCS (spiritual, moral, social and cultural education).

In LBTH the Prevent Education Officer is Iona Karrman-Bailey: [iona.Karrman-Bailey@towerhamlets.gov.uk](mailto:iona.Karrman-Bailey@towerhamlets.gov.uk)

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

## Child-On-Child Abuse

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

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

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

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

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse such as biting, hitting, kicking or hair pulling
- sexually harmful behaviour and sexual abuse including inappropriate sexual language, touching, sexual assault or rape
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos
- teenage relationship abuse – where there is a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- upskirting – taking a picture under a person's clothing without their knowledge and/or permission with the intention of viewing their buttocks or genitals (with or without underwear) to obtain sexual gratification. It is a criminal offence.
- initiation/hazing - used to introduce newcomers into an organisation or group by subjecting them to a series of trials and challenges, which are potentially humiliating, embarrassing or abusive.
- prejudice and discrimination - behaviours which cause a person to feel powerless, worthless or excluded originating from prejudices around belonging, identity and equality, for example, prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

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

Although a child identifying as LGBTQ+ is not in itself a safeguarding concern, such children may be more vulnerable to forms of child-on-child abuse. This includes children who are perceived to be LGBTQ+ even though they do not identify as such. The school is committed to providing a safe space for LGBTQ+ children to share any concerns they may have and in ensuring an inclusive culture is maintained.

At Stepney Park Primary School, there are a number of preventative measures in place to minimise child-on-child abuse. These include the school value of 'respect' which is promoted through the school's learning behaviours - notably 'empathy' and 'responsibility'. Our bespoke PSHEE curriculum has a strong emphasis on equality and friendships.

Our behaviour policy encourages staff to record all 'level 2' behaviours which alerts senior leaders to act early and, if necessary, individual cases can be discussed in regular 'vulnerable children' meetings. Outcomes of these meetings can be shared with the wider school, specific teams or individuals to monitor any situation, whilst informing parents or other agencies as appropriate. If necessary, the DSL may seek advice from Tower Hamlets MAST line. Children are taught the importance of private body parts through the NSPCC PANTS rule and all children are taught who a 'trusted adult' is at school to encourage them to speak-up if they have any concerns.

All aspects of child-on-child abuse will be recorded on CPOMS. Where the incident is described as child-on-child abuse, the DSL will take a leading role in the investigation and sharing information with the necessary stakeholders. For such incidents, the DSL will seek guidance from Tower Hamlets Children's Services.

Stepney Park Primary School will offer support for victims, perpetrators and other children (or wider family) through appropriately trained staff. This might include: assistant headteachers, ELSAs, school councillor, Educational Psychologist or CAMHS referral.

### **Child-on-Child Sexual Violence and Sexual Harassment**

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

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

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

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

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;



- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting upskirts. Dismissing or tolerating such behaviours will help to normalise them.

Sexual violence offences are defined under the Sexual Offences Act 2003

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

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

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

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

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

All Staff need to be aware of the following:

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

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

### **Sexual Harassment**

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

Sexual Harassment may include the following:

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

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

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

### **Harmful Sexual Behaviours**

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

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

When such incidents are noted at Stepney Park Primary School, the DSL will lead on the investigation and subsequent outcomes and actions. Throughout the entire process, from the initial disclosure/concern to the ongoing support, everything will be recorded on CPOMS. At the appropriate time, Risk Assessments will be created and shared to protect and support the victim, perpetrators as well as any other individuals as appropriate. Support will be offered to the victim and perpetrator throughout. Support could be through: the DSL, an assistant headteacher, ELSAs, school councillor, Educational Psychologist, or CAMHS referral.

### **Youth Produced Sexual Imagery**

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

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

Incidents may also occur where:

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

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

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

At Stepney Park Primary School, any report of youth produced sexual imagery would be referred to the DSL. As per UKCIS guidance, the image(s) would not be viewed, copied, shared or stored by any staff member - if this occurs the DSL will be informed who will then seek advice. Only the DSL will speak to the children involved regarding the incident and the imagery in question - the children will not be blamed or shamed - and the children will be told the incident will be reported and support will be offered. Information regarding the incident will not be shared without seeking advice.

## **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 2024 and Behaviour in Schools. Advice for Head teacher and School Staff](#) (September 2022).

Any incidences of bullying (including cyberbullying) at Stepney Park Primary School will follow the procedures outlined in the Behaviour Policy found on the school website.

## **Homelessness**

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

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

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

## **Children and the Court System**

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

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

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

## **Children with Family Members in Prison**

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

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

## **Private Fostering**

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

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

## **Young Carers**

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

- a long-term illness or condition

- a physical or learning disability
- a substance misuse problem
- a mental health problem

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

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

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

## **Child Abduction and Community Safety Incidents**

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

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

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

## **Modern Slavery**

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer 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.

## **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. **Where a child may be at risk, the DSL must be verbally informed as soon as possible.**
- 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, **A CPOMS report must be completed the same day to increase accuracy of the report.**
- seek support for yourself if you are distressed.

## Early Help

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

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

All staff need to recognise that all children may benefit from Early Help at any point in their childhood, but some children may benefit from Early Help more than others. These are children with known vulnerabilities, which are listed on page 9 of this policy.

At Stepney Park Primary School, our Pastoral Care Team, in coordination with the DSL, provides Early Help support; including the use of Early Help Assessments (EHAs). EHA reviews and Team Around the Child/Family meetings are also led in school when there is a multi agency approach. Referrals to Tower Hamlets Children's Social Care are made if thresholds are met.

The DSL will contact the LBTH MAST for support and advice if required:

020 7364 5006 (Option 3)

020 7364 3444/5601/5606/5358/7796

### Social Inclusion Panel

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

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

## Handling the Reporting or Sharing of Concerns

**All staff at Stepney Park Primary School have a safeguarding duty. Even if staff are unsure, they are encouraged to report their concern on CPOMS so that a DSL can have the overview and decide necessary action. If a child is deemed to be at risk, a DSL must be informed immediately and the**

CPOMS report can be completed by the end of the same working day. The DSL will always be available to discuss concerns with a staff member.

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

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

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

- allow the child to speak freely
- remain calm
- allow silences
- refrain from asking leading questions
- tell the pupil what will happen next
- inform the DSL as soon as possible
- seek support from their line manager if they feel distressed.

The DSL will seek advice from Tower Hamlets Children's Services regarding the notification of parents, in particular the information to share and the timeframe in which to do so that they can complete their own investigations if necessary. It may be in the best interest of the child to not inform parents immediately.

## **Confidentiality and Sharing Information**

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

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

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

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

~~The DSL~~ Staff will have due regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR) to ensure that personal information is processed fairly and lawfully and they will adhere to the seven golden rules for sharing information. Information sharing will take place in a timely and secure manner.

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

Information sharing decisions will be recorded, whether or not the decision to share has been taken. Child protection information will be stored securely separate from the pupil's school file. Child protection information is stored and handled in line with the school's Retention and Destruction Policy. Where safeguarding information is stored electronically and online, the school has cybersecurity measures in place, which meets the Department for Education's [Cybersecurity Standards](#), to ensure the data is safe and not vulnerable to evolving cyber-crime.

## Referring to Children's Social Care

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

**LBTH Multi-Agency **Support Team Safeguarding Hub:****  
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 Safeguarding Hub**, the referral form will be accurate and sufficiently detailed to enable the **MAST Assessment and Intervention Team** to make a decision on the level of ~~statutory~~ response required in accordance with the ~~LBTH Thresholds~~ **THSCP Levels of Need** Guidance.

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

The procedure for all staff to follow, regarding how safeguarding reports are handled within Stepney Park Primary School can be found in [appendix 1](#).

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



## Appendix 1: Safeguarding Poster at Stepney Park Primary School

# Stepney Park Primary School

## Safeguarding Procedure



**David Smith**  
Designated Safeguarding  
Lead (DSL) Ext. 206



**Louisa Beringer**  
Deputy DSL  
Ext. 213



**Khaleda Begum**  
Deputy DSL  
Ext. 307

### Disclosure or Concern

#### Concern about a member of staff

Concerns should be reported immediately to Edith (Headteacher). If the allegation is against the Headteacher, the matter can be reported to the Local Authority Designated Officer (LADO) on 0207 3643 506.

#### Concern/disclosure about a child

If the issue is urgent, report the disclosure verbally, without delay, to any DSL. If a named DSL (above) is not available, then report the issue to any other SLT member\*. Should none of the above staff members be available, then report the issue directly to the Tower Hamlets Child Protection Advice Line on 0207 364 3444.

*\*All members of SLT are DSL trained.*

#### Our Safeguarding Duty

It is the responsibility of all staff to promote and ensure the wellbeing and safeguarding of our children. If a child does share concerns we will:

- ❑ **Listen**, be supportive and take them seriously
- ❑ **Reassure** the child that they have done the right thing
- ❑ **Let the child lead** and be asked open questions
- ❑ **Be honest** about what you'll do next

#### Recording Safeguarding Concerns

Staff will, as soon as reasonably possible, complete an incident report on CPOMS. Detailed, factual records must be added and categorised as 'safeguarding'.

Safeguarding leads will follow up and subsequent actions will be added.

## Appendix 2: Contact Information for Stepney Park Primary School

Name	Contact
<b>Child Protection Governor:</b> Ros Coffey	<a href="mailto:rcoffey3.211@apps.stepneypark.towerhamlets.sch.uk">rcoffey3.211@apps.stepneypark.towerhamlets.sch.uk</a>
<b>Designated Safeguarding Lead (DSL) and Senior Mental Health Lead:</b> David Smith	dsl@apps.stepneypark.towerhamlets.sch.uk
<b>Deputy DSLs:</b> Khaleda Begum  Louisa Beringer	dsl@apps.stepneypark.towerhamlets.sch.uk
<b>Headteacher</b> Edith Philipsen	admin@stepneypark.towerhamlets.sch.uk
<b>SENCo</b> Nathalie Palacio	admin@stepneypark.towerhamlets.sch.uk

## Appendix 3: MASH MAST Poster



### **Multi-Agency Support Team (MAST)** **020 7364 3444 / 5601 / 5606 / 5358 / 7796**

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

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

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

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

Important contact information:

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

September 2024

## Appendix 4: MASH Interagency MAST Request for Support Form



### Multi Agency Support Team (MAST) Request for Support Form

If you are concerned about a child or family, use this form to get support from the team at Tower Hamlets Council and our partners.

You can expect feedback within 24 to 48 hours upon submission of this referral form. We are dedicated to actively collaborating with you and other relevant services to guarantee every child receives the necessary support.

*\*Please indicate the relevant option by placing a tick in the corresponding box.*

#### Agency

We work with several agencies and partner organisations in Tower Hamlets.

**Do you work for an agency or partner organisation?**

Yes		No	
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#### Anonymous reporting

If you are not working for an urgency or partner organisation, do you want to make this referral anonymously? If you are reporting anonymously, by reporting this anonymously we will not be able to email you confirmation of the report and will not be able to let you know about the outcome.

Yes		No	
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#### Consent

If a child is giving consent, they must be over 16.

Someone with parental responsibility is an adult who is a biological parent or an adult that has a court order to care and make decisions about the welfare of the child daily

Child over 16		Someone with parental responsibility		Neither	
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**If you have selected 'Neither,'** Consent should be given by the child or family before making a referral, unless the child is at risk of immediate significant harm.

**Is the child at risk of immediate significant harm?**

Yes		No	
-----	--	----	--

**What's your name (if you are not reporting anonymously)?**

What is your first name?	
What is your last name?	

**Referrer's agency**

**What agency do you work for?**

Name and Details	
------------------	--

**What is your role at your Organisation/ Institute?**

--

**What is your phone number?**

--

**What is your email address?**

--

**Child's name**

What is the child's first name?	
What is the child's last name?	

**Date of Birth**

Do you know the date of birth of the child?	<b>Yes</b>		<b>No</b>	
---	------------	--	-----------	--

Date of Birth or expected date of birth.	<b>Day</b>		<b>Month</b>		<b>Year</b>	
Sex at Birth	<b>Male</b>		<b>Female</b>		<b>Not Known</b>	

<b>Child's ethnicity</b> What is child's ethnic group?
---

*Choose from the following: English, Welsh, Scottish, Northern Irish, British, Irish, Gypsy or Irish Traveler, Roma, Any other White background, White and Black Caribbean, White and Black African, White and Asian, Any other Mixed or Multiple background, Bangladeshi, Pakistani, Indian, Chinese, Any other Asian background, Caribbean, Somali, Other African, Any other Black, Black British or Caribbean background, Arab, Other, Prefer not to say, Don't know.*

**Child's religion**

**What is the religion of the Child?**

*Choose from the following: Christian, Muslim, Hindu, Buddhist, Sikh, Prefer Not to say, Don't Know, No Religion, Other.*

**Does the child have a disability or special educational need?**

<b>Yes</b>		<b>No</b>		<b>Don't Know</b>	
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**Child's Education**

**Is Child being educated?**

Yes, at School	
Home schooled	
Not in education	
Don't know	

**Name of the School:**

**Child's Address**

Do you know the child's address?	<b>Yes</b>		<b>No</b>	
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<b>If 'Yes', provide the following</b>	
Postcode	
Address	

**Child's first Language**

*Choose from the Following: Don't know, English, British Sign Language, Bengali, Italian, Spanish, French, Portuguese, Chinese, Polish, Romanian, Greek, Russian, Arabic, Somali, German, Turkish, Other (Please Mention)*

**Sign language**

We are able to offer a British Sign Language interpreter to anyone who needs it.

Does Child need a British Sign Language interpreter?	Yes		No		Don't Know	
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**Child's immigration status**

What is child's immigration status?

British or Irish citizen, habitually resident in UK, Ireland, Channel Islands, or Isle of Man, or deported from another country	
EEA citizen residing in the UK prior to 31 December 2020: worker	
EEA citizen residing in the UK prior to 31 December 2020: self-employed	
EEA citizen residing in the UK prior to 31 December 2020: settled status	
EEA citizen residing in the UK prior to 31 December 2020: other	
EEA citizen residing in the UK prior to 31 December 2020: A family member of one of the above groups	
Non-UK: Granted refugee status	
Non-UK: Exceptional Leave to Remain	
Non-UK: Indefinite Leave to Remain	
Non-UK: Limited Leave to Remain	
Non-UK: Other protection (e.g. humanitarian, discretionary, family of Northern Ireland and stateless persons under Immigration rules)	



Don't know	
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Is child a young carer?	Yes		No		Don't Know	
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What is child's NHS number? (Optional)	
What is child's unique pupil number? (Optional)	

Has child or their family ever been the subject of a Children Social Care assessment?

Yes		No		Don't know	
-----	--	----	--	------------	--

Is there a Private Fostering agreement for child?

Yes		No		Don't know	
-----	--	----	--	------------	--

Are there any other children in the household?

Yes		No		Don't know	
-----	--	----	--	------------	--

Number of other children	
How many other children are there in the household?	

Other children's information

Child's first name	
Child's last name	

Is there a Private Fostering agreement for Child	Yes		No		Don't know	
Do you know Child's date of birth?	Yes		No			



<b>Date of Birth</b>	<b>DD</b>		<b>MM</b>		<b>YYYY</b>	
<b>Child's Sex</b>	<b>Male</b>		<b>Female</b>		<b>Don't know</b>	

<b>What is Child's ethnic group?</b>	
<b>What is Child's religion?</b>	

<b>Does Child have a disability or special educational need?</b>	<b>Yes</b>		<b>No</b>		<b>Don't Know</b>	
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**Is Child being educated?**

Yes, at School	
Home Schooled	
Not in Education	
<b>Who provides education for Child?</b>	

<b>Has Child previously been referred to Children's Services?</b>	<b>Yes</b>		<b>No</b>		<b>Don't Know</b>	
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<b>What is Child's first language?</b>	
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<b>Does Child need an interpreter to translate for them?</b>	<b>Yes</b>		<b>No</b>		<b>Don't Know</b>	
<b>Does Child need a British Sign Language interpreter?</b>	<b>Yes</b>		<b>No</b>		<b>Don't Know</b>	

<b>What is Child's immigration status?</b>	
<b>What is Child's NHS number? (Optional)</b>	
<b>What is Child's unique pupil number? (Optional)</b>	



**Principal carer's details**

<b>Do you know child's principal carer's information?</b>	Yes		No	
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**Principal/main carer**

The person who has most parenting time with child

<b>Principal carer's first name</b>	
<b>Principal carer's last name</b>	
<b>Principal carer's relationship</b> What is Principal carer's relationship to child	
Parent	
Guardian	
Carer	
Other Family Member	
Other	

**Principal carer's sex**

Male		Female		Not Known	
------	--	--------	--	-----------	--

<b>Do you know the principal carer's date of birth?</b>	Yes		No	
---	-----	--	----	--

<b>Principal carer's date of birth</b>	DD		MM		YYYY	
--	----	--	----	--	------	--

<b>Principal carer's ethnicity</b>
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*Choose from the following: English, Welsh, Scottish, Northern Irish, British, Irish, Gypsy or Irish Traveler, Roma, Any other White background, White and Black Caribbean, White and Black African, White and Asian, Any other Mixed or Multiple background, Bangladeshi, Pakistani, Indian, Chinese, Any other Asian background, Caribbean, Somali, Other African, Any other Black, Black British or Caribbean background, Arab, Other, Prefer not to say, Don't know.*

**Principal carer's first language**

*Don't know, English, British Sign Language, Bengali, Italian, Spanish, French, Portuguese, Chinese, Polish, Romanian, Greek, Russian, Arabic, Somali, German, Turkish, Other (Please Mention)*

**Principal carer's contact number**

**Principal carer's sign language**

Does Principal carer need a British Sign Language interpreter?

Yes		No		Don't know	
-----	--	----	--	------------	--

**Does child have another parent, guardian or carer in their household?**

Yes		No		Don't know	
-----	--	----	--	------------	--

**If the child has another parent, guardian or carer in their household, do you know the other parent, guardian or carer's details?**

Yes		No	
-----	--	----	--

**If 'Yes', please fill the following details**

Other parent, guardian, or carer details	
Other parent's first name	
Other parent's last name	
<b>Relationship to the child and contact number</b>	
Parent	
Guardian	
Carer	
Other family member	
<b>Ethnic group</b>	



**Are there any other significant people in child's life.** Other significant people in the child's life, this might be grandparents, aunts, uncles, or other family members.

Yes		No		Don't know	
-----	--	----	--	------------	--

**If the child has any other significant people in child's life, details of the person.**

<b>What is this person's first name?</b>	
<b>What is this person's last name?</b>	
<b>What is the relationship to child</b>	
Parent	
Guardian	
Carer	
Other family member	
Other (Please mention)	

**Has anyone in the household ever had a Child Protection Plan?**

Yes		No		Don't know	
-----	--	----	--	------------	--

**If anyone in the household ever had a Child Protection Plan, please provide details of the person with a Child Protection Plan, dates and all relevant information.**

--

**Has anyone in the household ever been looked after by a local authority?**

Yes		No		Don't know	
-----	--	----	--	------------	--

**Child looked after by a local authority details**

Please provide details of name of person being looked after, dates and all relevant information

--

### **Child in need**

Under Section 17 Children Act 1989, a child is considered "in need" if:

London Borough of Tower Hamlets

- They are unlikely to achieve or maintain a reasonable standard of health or development without services from the Local Authority.
- Their health or development is likely to be significantly impaired without such services.
- They have a disability, which includes conditions like blindness, hearing impairments, mental disorders, and permanent illnesses or congenital deformities

**Has anyone in the household ever been a 'child in need'?**

Yes		No		Don't know	
-----	--	----	--	------------	--

**Child in need details**

Which children are or were considered to be a 'child in need'? Please tell us the name of the child, the dates they were in need and any other relevant information.

**Early help**

'Early help' describes any service that supports children and families as soon as problems emerge.

Has anyone in the household ever received support from Early Help?

Yes		No		Don't know	
-----	--	----	--	------------	--

**Early help details**

Which children are or were receiving 'early help'? Please tell us the name of the child, the dates they were receiving early help and any other relevant information.

**Are any other agencies or professionals working with the family?**

Yes		No		Don't know	
-----	--	----	--	------------	--

**If 'Yes', please provide the following**

**What is the name of the professional working with the family?**

What is the role of the professional working with the family?
What is the name of the agency or organisation working with the family?
What is the contact email address for this agency or organisation?
What is the contact phone number for this agency or organisation?

**Level of need**

More information on level of need: [The Four Levels of Need](#)

Level 1: No Additional Needs	
Level 2: Early Help	
Level 3: Children with Complex Multiple Needs	
Level 4: Children in Acute Need	
Don't know	

**Family strengths**

What is currently working well for the child and family? Share positive aspects or abilities within the family that can be further supported.

--

**Worry**

**What are you most worried about?**

Describe your concerns for the family or any issues that require assistance or support

--

**Further information**

Please provide us with any further information about the child's development and any other presenting issues.

**Current situation**

How safe do you think child is? On a scale of 0 to 10 where 0 means the child is at risk of harm and 10 means the child is safe.

0   1   2   3   4   5   6   7   8   9   10

Please tell us how you reached this score?

**Action**

Please tell us if any action has taken place to help the family resolve the difficulties, they are experiencing

**Supporting documents**

Do you have any relevant supporting documents, like assessments or the latest review that you would like to upload?

(Attach and submit the files)

## Appendix 5: Touch Protocol

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

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

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

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

### **Appropriate Touch**

#### **Examples of where touching a pupil might be proper or necessary:**

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

#### **Calming, comforting or reassuring a child:**

Before using touch, staff need to consider using other methods, including:

- Slowing down the pace
- Lowering the voice
- Breathing more deeply
- Talking slowly, firmly and quietly in an unhurried, unflustered way
- Providing clear, predictable, consistently held boundaries.



- Offering choices
- Distraction /positive redirection

If these methods do not help, then the following appropriate use of touch can calm, soothe and regulate a child's emotions:

- A reassuring pat on the arm
- Stroking a child's head, back or an arm
- Putting an arm around a child's shoulders
- Taking a child by the hand
- A brief hug
- Allowing an EYFS child to sit on an adult's lap for a very limited period of time (when initiated by the child)

### **Prevention of an accident, protecting someone or protecting school property:**

Situations in which appropriate touch may be considered include:

- The child is incensed and out of control
- There is an immediate danger or safety concern
- Verbal attempts to engage the child have failed

Appropriate types of touch in preventing accidents, protecting someone or protect school property:

- Holding a child's hand (e.g on a trip or whilst moving around school)
- Physically interposing between pupils
- Blocking a pupils' path
- Leading a pupil
- In extreme circumstances
  - Holding a pupil
  - Carrying a pupil

Further guidance can be found in the Positive Handling Policy. A child who requires touch to prevent harm to themselves or others generally would have an Individual Behaviour Action Plan, which would refer to situations which are likely to escalate and would identify actions to be taken to prevent this.

Recording:

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

### **Supporting children who have an EHCP**

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

The reasons for appropriate touch may include:

- To keep the child safe,
- To keep others safe
- A specific way or strategy to help the child calm down and regulate

- To clean the child, to support the child with toileting, to change the child's nappy or to change the child's clothes
- To meet a child's sensory needs such as TAC / PAC
- A form of specialised communication such as intensive interaction

### **Individual Touch Plans**

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

Individual Touch Plans should:

- Be personalised for an individual child, written for their specific needs, based on knowledge we have about the child and taking into account the advice from experts
- Based on the principle which follows the least 'amount of touch needed'.
- Always have child safety as the highest priority
- Be agreed with the SENDcos and where appropriate, other professionals
- Be agreed and signed by the parents.
- Should be regularly (but at least annually) reviewed
- Should describe:
  - What situations and/ or teaching activities are likely to require touch
  - What appropriate touch types are acceptable
  - Where applicable:
    - What the triggers might be that necessitate touch
    - How touch can be minimised
- Be saved on CPOMs and Edukey
- Be shared with all relevant adults, including support staff.

### **Inappropriate Touch**

Touch should never be:

- Longer than necessary in order to meet the child's needs
- To redirect a child because they are off task
- Impulsive or ill-thought out
- A punishment
- Aggressive (e.g. grabbing, pushing, striking, or pulling)
- To satisfy the staff member's own need for physical contact or reassurance.
- Experienced as invasive, confusing, traumatising or potentially erotic.
- Of a sexual nature for adult gratification.

### **Safeguarding:**

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

### **Staff Code of Conduct**

- Staff should self-report or report others who use touch inappropriately, following the disclosure reporting procedures.

- Allegations of inappropriate touch will be investigated and appropriate actions will be taken.
- The staff Code of Conduct and Disciplinary Policy can be found here:  
[Code of Conduct Policy](#) and [Disciplinary Policy & Procedure.docx](#)

## Pro forma Individual Touch Plan

<b>Individual Touch Plan for</b>	
<b>DOB</b>	

*Photo Here*

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

What are the child's likely triggers and reasons that might necessitate touch?	
<p><b>To support routines:</b></p> <ul style="list-style-type: none"> <li>● example</li> <li>● example</li> </ul> <p><b>For emotional regulation:</b></p> <ul style="list-style-type: none"> <li>● example</li> <li>● example</li> </ul> <p><b>To keep safe:</b></p> <ul style="list-style-type: none"> <li>● example</li> <li>● example</li> </ul> <p><b>For communication &amp; interaction:</b></p> <ul style="list-style-type: none"> <li>● example</li> <li>● example</li> </ul> <p><b>For toileting and changing:</b></p> <ul style="list-style-type: none"> <li>● example</li> <li>● example</li> </ul>	
How can the need for touch be minimised?	
Situations and teaching activities which are likely to require touch	Appropriate touch
	●
	●

