



# **MULBERRY UTC CHILD PROTECTION POLICY**

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**The principal priority for Mulberry UTC is to provide our pupils with life chances – good qualifications and the capacity to be successful, fulfilled, healthy, happy and confident adults with a rich range of personal resources upon which they can draw.**

As a University Technical College, we have a particular focus on preparing young people for the world of employment, by ensuring students have access to high quality industry experience and employer-led projects, to help them develop the skills they need to succeed when they leave school.

At Mulberry UTC, every member of staff is driven by the desire to make a lasting difference to our students, their families and our wider community through the education we provide and the associated services we offer. We are passionate about the need for all young people to have access to high quality educational opportunities, regardless of whether they want to follow an academic or a technical path. We are committed to ensuring that the UTC provides young people with access to high quality academic and technical education, to ensure they can achieve their full potential and go on to succeed when they graduate.

The Child Protection Policy at our school is meticulously crafted to ensure the safety and well-being of every student. To make this policy readily available and accessible to all stakeholders, including staff, parents, and visitors, we have implemented a multifaceted approach. Our school website serves as a central hub where the policy can be easily accessed and reviewed by anyone seeking information. In addition, the policy is included in our shared drive, ensuring that staff members have easy access to it for reference and review. It is an integral part of our staff handbook, forming a crucial component of our induction process for new staff members and an ongoing part of staff training. To keep parents well-informed, the Child Protection Policy is included in our parent pack and covered during the parent induction sessions. Finally, a hard copy is also available in the school office for any visitors who may wish to familiarise themselves with our commitment to child protection. Our comprehensive approach ensures that all stakeholders are aware of and have access to this vital policy, reaffirming our dedication to safeguarding the welfare of our students.

At Mulberry UTC, we are committed to ensuring the safety and well-being of all our students. To uphold this commitment, we have established a comprehensive safeguarding policy and a range of other safeguarding policies that are regularly reviewed to remain up-to-date and effective.

Our policy review process includes a commitment to conduct annual reviews as a standard practice. However, we recognise that the need for immediate review may arise in response to specific incidents, changes in legislation, or updated guidance from relevant authorities. In such cases, we will promptly initiate the review process to ensure our policies are in alignment with the most current best practices and legal requirements.

Mulberry UTC reaffirms its dedication to safeguarding through its robust policy framework and continuous commitment to policy review, ensuring that our school remains a safe and nurturing environment for all students to thrive.

Our commitment to child protection extends to all members of our school community, encompassing staff, volunteers, visitors, and governors. Our Child Protection Policy outlines clear procedures that apply universally, ensuring a safe environment for every individual involved with our school. These procedures have been meticulously crafted to align with the latest guidelines, notably Keeping Children Safe in Education 2023, and they also reflect the specific safeguarding arrangements in place within the Tower Hamlets Safeguarding Children Partnership. Additionally, our procedures encompass the Supplementary Guidance documents pertaining to Child Protection Procedures and the Management of Allegations and Concerns, including those that fall below the Harm Threshold. This comprehensive approach underscores our unwavering commitment to the safety and well-being of all those within our school community.

## 1. CORE SAFEGUARDING PRINCIPLES

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

- The Designated Safeguarding Lead will ensure that all pupils and staff involved in safeguarding and child protection issues will receive appropriate support.

These 6 core principles are embedded within the school's safeguarding arrangements; underpin the school's safeguarding policies, procedures and systems; and pervade the whole school approach to safeguarding at **Mulberry UTC**.

## 2. PURPOSE OF POLICY

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

## 3. SAFEGURDING LEGISLATION AND GUIDANCE

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

- Section 175 of the Education Act 2002 (Local maintained schools only)
- Section 157 of the Education Act 2002 (Independent schools only, including academies and Free Schools)
- The Education (Independent School Standards) Regulations 2014 (Independent schools only, including academies and Free Schools)
- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- Education and Training (Welfare of Children) Act 2021 (16-19 Academies and Independent Training Providers)
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguarding Children 2018 (Updated July 2022)
- Keeping Children Safe in Education (1 September 2023)
- What to do if you're worried a child is being abused 2015
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014)
- The Teacher Standards 2012

#### 4. TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP SUPPLEMENTARY SAFEGUARDING GUIDANCE

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

- London Child Protection Procedures revised 7th Edition (London Safeguarding Children Board, 31<sup>st</sup> March 2023)
- Tower Hamlets SCP Multi-Agency Safeguarding Thresholds Guidance
- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Child Protection Procedures - September 2023
- 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 – September 2023

#### 5. TOWER HAMLETS SAFEGUARDING CHILDREN PARTNERSHIP

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

The school has been named as a 'relevant agency' and as such is under a statutory duty to cooperate with the THSCP arrangements.

The school will engage with the borough's Designated Safeguarding Lead Forums, co-operate with the Rapid Review process and any Child Safeguarding Practice

Reviews,<sup>1</sup> participate in the THSCP multi-agency safeguarding training offer, and co-operate with the THSCP's and borough's Section 175/157 School Safeguarding Audit cycles.

## 6. KEY DEFINITIONS

Safeguarding and promoting the welfare of children is:

- protecting children from maltreatment
- preventing the impairment of a child's physical and mental health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

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

Child includes everyone under the age of 18.

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

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

## 7. ROLES AND RESPONSIBILITIES

The Governing Body 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.

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<sup>1</sup> For more information on the Rapid Review process, Child Safeguarding Practice Reviews and Child Death Reviews, Working Together 2018 Chapters 4 and 5 should be consulted. Working Together 2018 paragraphs 25-27 provide more information on the expectation of school's role within the safeguarding partnership arrangements.



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 Lois Whittaker.

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.

Julia Kibela-Purnell: Assistant Principal & Designated Safeguarding Lead

Daniel Seed: Principal & Deputy Safeguarding Lead

Aura Fabio: SENDCO

Sofia Soares: Deputy SENDCO

Rukshana Amer: Attendance & Welfare Officer

Out of school hours, if parents have any safeguarding concerns or require assistance related to their child's well-being, we urge them to contact the Multi-Agency Safeguarding Hub (MASH) and Children's Services. These dedicated agencies are available to provide support, guidance, and intervention when necessary, ensuring that the safety and welfare of children remain a top priority year-round. Your child's well-being is important to us, and these agencies are here to assist you during the holiday period.

020 7364 3444 / 5601 / 5606  
MASH@towerhamlets.gov.uk

Children's Social Care Emergency Out of Hours Duty Team (5.00pm onwards)  
020 7364 5006 – choose Option 3

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.

To ensure the safety and well-being of our students, staff are encouraged to promptly report any safeguarding concerns to our designated safeguarding lead (DSL), Julia Kibela-Purnell. Julia can be reached via email at [jkibela-purnell@mulberryschoolstrust.org](mailto:jkibela-purnell@mulberryschoolstrust.org). When reporting a safeguarding concern, staff should use our school's designated safeguarding record system, which in our case is CPOMS. Within CPOMS, staff should provide detailed information about the concern, incidents, and any actions taken. It is essential that the DSL is informed as soon as a concern arises, as we prioritise a swift response to ensure the safety of our students. Your vigilance and commitment to safeguarding, as recorded in CPOMS, are crucial in maintaining a secure environment for all.

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.

## 8. RIGHTS OF THE CHILD

The school upholds the Human Rights of the child in accordance with the Human Rights Act 1998.<sup>2</sup> 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). For more detailed information on our commitment to equality, please refer to our school's dedicated Equality Policy.

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<sup>2</sup> <https://www.equalityhumanrights.com/en/human-rights>

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.

Within the context of safeguarding and promoting the welfare of children in Tower Hamlets, our school is dedicated to supporting all pupils, including those with protected characteristics such as disability, sex, sexual orientation, gender reassignment, and race. We understand the importance of addressing the specific needs of our diverse student body. This commitment includes taking proactive measures, where proportionate, to address any disadvantages that may affect pupils or students with particular protected characteristics, ensuring their unique needs are met. Furthermore, we recognise our duty to make reasonable adjustments to accommodate disabled children, including those with long-term conditions. For example, if evidence indicates that certain groups, such as girls, are disproportionately subjected to sexual violence or harassment, we will consider taking positive action to provide the necessary support and protection. Our aim is to create an inclusive and safe learning environment for all, where every child's well-being is a top priority.

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.<sup>3</sup> 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.<sup>4</sup> The action plan recognises that schools have a powerful and significant role in changing narratives and bringing about social change through education.

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

<sup>4</sup> [https://www.towerhamlets.gov.uk/lqnl/community\\_and\\_living/Inequality-Commission/Black-Asian-and-Minority-Ethnic-Inequalities-Commission.aspx](https://www.towerhamlets.gov.uk/lqnl/community_and_living/Inequality-Commission/Black-Asian-and-Minority-Ethnic-Inequalities-Commission.aspx)

To reference our commitment to fostering a whole-school approach to anti-racism at Mulberry UTC, please see our dedicated initiatives and programs aimed at promoting diversity, equity, and inclusivity within our school community.

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

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

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

## 10. CHILDREN IN NEED OF A SOCIAL WORKER

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

When making decisions about safeguarding, carrying out 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.

Staff members should be aware of the implications regarding children known to a Social Worker. In such cases, it is crucial for staff to maintain open lines of communication with the designated safeguarding lead and the Social Worker involved. This may include sharing any relevant information or observations promptly and discreetly, as well as following the guidance and recommendations provided by the Social Worker to ensure the child's well-being and safety. Staff should exercise heightened vigilance and sensitivity when interacting with these children and be prepared to offer additional support as required to promote their welfare and development. The school's policies and procedures for working with children known to a Social Worker should be adhered to diligently, with the paramount goal of ensuring the child's best interests and safety at all times.

## 11. CHILDREN REQUIRING MENTAL HEALTH SUPPORT

All staff have an important role in supporting the mental well-being of children and to identify behaviour that may suggest a child is experiencing mental health problems.<sup>5</sup> 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 our school, we have established a comprehensive referral pathway and support system for children facing mental health challenges, ensuring they receive the care and assistance they need. Central to this system is our designated Mental Health Lead, who plays a critical role in overseeing and coordinating mental health support within our school community. Our Mental Health Lead is a valued member of our Senior Leadership Team (SLT) or is supported directly by a member of SLT, ensuring that mental health is a priority at the highest level of our school's administration. We are also proud of our engagement with the Tower Hamlets Education Well-being Service, which further enhances our ability to provide effective support. Through our collaboration with this service, we have been able to develop a comprehensive whole-school approach to mental well-being. This approach ensures that mental health is integrated into our school culture, curriculum, and daily practices. Our commitment to the mental well-being of our students is unwavering, and we believe that a supportive and nurturing environment is crucial for their success and happiness. Staff members play a vital role in identifying and referring students in need, and we are dedicated to equipping them with the knowledge and resources necessary to do so effectively. Together, we strive to create a safe and caring community where the mental health and well-being of every student are paramount.

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

## 12. LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN

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

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.

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

### 13. SEND CHILDREN

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), 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 our school, we are dedicated to providing unwavering support and safeguarding measures for all our pupils, including those with Special Educational Needs and Disabilities (SEND), as well as children who may have physical health conditions. Our commitment extends to ensuring that our safeguarding systems are accessible to every child, regardless of their individual needs.

We recognise the importance of staff vigilance when working with SEND pupils and are committed to fostering an inclusive and supportive environment. Staff members



are encouraged to proactively identify any barriers that may affect the well-being and progress of our SEND pupils. When such barriers are identified, staff are expected to take action to ensure they are overcome. This includes providing additional support, making necessary adaptations to the curriculum and learning environment, and collaborating with our SEND Coordinator to implement individualised support plans when required.

Our school's ethos revolves around inclusivity, where every child's unique needs are recognised and addressed. We believe that by working together as a community and remaining vigilant, we can ensure that all our pupils, regardless of their abilities or health conditions, have the opportunity to thrive in a safe and supportive educational environment.

#### 14. 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.

At our school, we have a well-established protocol for following up on student absences, ensuring that the safety and well-being of our students remain a top priority. Our approach is outlined comprehensively in our Attendance Policy, which serves as a guiding document for all staff members.

Staff members are required to diligently follow the protocol outlined in our Attendance Policy when dealing with student absences. This includes promptly

reporting any unexplained absences to the school office, where our attendance team will initiate the necessary follow-up procedures. In cases where absences persist or are of concern, staff are expected to collaborate with our dedicated attendance team to implement appropriate interventions, which may include contacting parents or guardians to understand the reasons behind the absence.

Our commitment to maintaining high attendance rates ensures that students receive the education and support they need to succeed. By adhering to our established protocol and working together as a school community, we can address and resolve attendance issues effectively, ultimately contributing to the well-being and educational progress of our students.

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

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

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

## 15. ELECTIVE HOME EDUCATION

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

When a parent informs the 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 ~~must~~ 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.

## 16. WHISTLEBLOWING

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

Staff members are expected to familiarise themselves with and adhere to our school's Whistleblowing Policy, which serves as a crucial framework for reporting concerns related to ethical and professional conduct. For further guidance and details regarding the whistleblowing process, please refer to our Whistleblowing Policy document. Your commitment to upholding the highest standards of integrity and accountability is valued and appreciated within our school community.

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 including:

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

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

Allegations of harm may indicate that a person who works with children might pose a risk of harm to children if they continue in that role. When an allegation is made against a member of staff including supply staff and volunteers, the school's Managing Allegations Procedures should be followed, and all action taken needs to be in line with KCSIE 2023 Part 4 and the THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – September 2023.

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

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.

**Staff code of Conduct:** [http://trust.staging-clients.co.uk/wp-content/uploads/2017/12/Code of Conduct Staff 2020.pdf](http://trust.staging-clients.co.uk/wp-content/uploads/2017/12/Code_of_Conduct_Staff_2020.pdf)

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

## 18. STAFF SAFEGUARDING TRAINING INCLUDING TRAINING FOR GOVERNORS

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 Mulberry UTC, we prioritise the ongoing training and development of our governors and staff to ensure the highest standards of safeguarding are maintained. Our comprehensive training program includes specific components tailored to the needs of different roles within the school community. For our governors and staff, regular safeguarding training is a mandatory requirement, and attendance is closely monitored. In the event that a staff member misses a training session, they are promptly provided with an opportunity to make up for the missed training. We understand the critical nature of this training in ensuring the safety and well-being of our students.

As part of our induction process for new staff, including agency staff and volunteers, safeguarding components are integrated to provide a comprehensive understanding of our policies and procedures. This induction equips them with the necessary knowledge to create a safe and nurturing environment for our students from day one.

To keep our staff updated, we provide regular safeguarding updates and bulletins. Staff members are encouraged to proactively stay informed and up-to-date with the latest developments and best practices in safeguarding. Communication of safeguarding policies, including KCSIE 2023 part 1, is done through multiple channels, ensuring accessibility to all staff members.

The effectiveness of our safeguarding training and policies is continuously measured through learning outcomes, assessments, and evaluations. We are committed to fostering a culture of vigilance and accountability, where the safety and well-being of our students remain paramount.

## 19. VISITORS

Within our school's comprehensive Visitors Policy, we outline a robust framework designed to safeguard our students during the duration of any visit. As part of this policy, we conduct thorough checks on all visitors, including vetting their background and ensuring they have the necessary credentials and permissions to engage with our students. Our priority is to create a secure environment where children are protected at all times.

In addition to our Visitors Policy, we also adhere to a protocol when inviting external speakers or individuals to our school. This protocol includes strict vetting procedures and guidelines to ensure that the content and interactions during these visits are appropriate and aligned with our values and safeguarding principles.

Our commitment to safeguarding extends to all aspects of our school community, including visitors and external speakers. By maintaining stringent policies and protocols, we can provide a safe and nurturing environment where our students can thrive without compromising their well-being.

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.

## 20. EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

At our school, we prioritise the safety and well-being of our students during extended and off-site activities, which is ensured through a meticulous risk assessment process. All such activities are subject to thorough risk assessments, where potential hazards and concerns are identified and addressed proactively. Importantly, our school's Child Protection Policy and safeguarding procedures are consistently applied, ensuring that students are protected even in off-site settings where there is direct management and supervision from the school.

To assure the effectiveness of safeguarding arrangements during off-site activities, we employ a robust oversight mechanism. Prior to any off-site activity, our dedicated team conducts a comprehensive review to confirm that all necessary safeguarding measures are in place. This process includes verifying staff-to-student ratios, the presence of appropriately trained personnel, communication protocols, and emergency response plans. In cases of residential visits or work-related activities, we conduct additional assessments to ensure that students' safety and welfare are maintained throughout the duration of the activity.

Our commitment to safeguarding remains unwavering, whether students are within the school premises or participating in off-site activities. We aim to create a secure and nurturing environment in all educational contexts, where students can explore, learn, and grow with the utmost confidence in their safety.

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 these 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.

## 21. 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.

## 22. 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.

## **23. 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.

In line with KCSIE 2023 Part 2, our school's Child Protection Policy includes robust systems designed to empower children to voice their concerns and report any instances of abuse. These systems are intentionally structured to be accessible, easily understood by all students, and actively promoted throughout our school community.

To ensure accessibility, we have established multiple channels for children to express their concerns confidentially. These include designated reporting points, trusted staff members, and a dedicated reporting platform, all of which are easily accessible to students. We have taken deliberate steps to make these reporting avenues known and readily available to all, including clear signage, awareness campaigns, and age-appropriate guidance on how to use them.

Understanding that clarity is essential, we have incorporated age-appropriate language and resources to ensure that even our youngest students can grasp the concept of voicing concerns and reporting abuse. This is reinforced through ongoing education, awareness-raising initiatives, and regular discussions within the classroom and across the school community.

Promotion of these systems is at the forefront of our safeguarding efforts. We foster an environment where children are encouraged to speak up, and we actively educate them on the importance of sharing their worries or discomfort. Our school's ethos emphasises the value of every child's voice, and we continually reinforce this message through assemblies, workshops, and engagement with parents and guardians.

By implementing these accessible, comprehensible, and widely promoted systems, we aim to empower our students to play an active role in safeguarding their own well-being and that of their peers.

## **24. SAFEGUARDING ISSUES**

### **25. 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.

As part of our commitment to safeguarding, we address the risks associated with Child Sexual Exploitation (CSE) through our PSHE (Personal, Social, Health, and Economic) and RSE (Relationships and Sex Education) curriculum. These crucial components of our educational program serve as vehicles for communicating CSE risks to our students in an age-appropriate and sensitive manner.

Within our PSHE and RSE curriculum, we integrate comprehensive discussions and lessons that help children understand the concepts of consent, healthy relationships, personal boundaries, and the risks associated with CSE. By addressing these topics in a structured and educational environment, we aim to equip our students with the knowledge and tools needed to recognise and respond to potential risks.

Our approach to communication emphasises open dialogue, empathy, and respect, fostering a safe space where students feel comfortable discussing sensitive issues related to CSE. By weaving these important discussions into our curriculum, we empower our students to make informed choices, seek help when needed, and contribute to their own safety and the well-being of their peers.

Through the PSHE and RSE curriculum, we uphold our commitment to promoting a comprehensive understanding of CSE risks and ensuring that our students are well-prepared to navigate the complexities of the world around them.

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

## 26. 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](#).

[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]

## 27. 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.

## 28. 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 ~~their peers~~ 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](https://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.

Our school employs a robust filtering and monitoring system to ensure a safe and secure online environment for our students when accessing the internet through school devices and on the school network. This system is designed to restrict access to inappropriate or harmful content while facilitating educational use. We regularly review the effectiveness of this system to adapt to evolving online threats and



emerging technologies, ensuring that it remains up to date and continues to provide a high level of protection.

In addition to our filtering and monitoring system, we have established stringent measures to ensure that Online Remote Learning is a safe and productive experience for both staff and pupils. Our approach includes secure access protocols, authentication procedures, and encrypted communication channels to safeguard data and protect the privacy of all participants. We provide clear guidelines and expectations for online behaviour, and our staff members are trained to promote a safe and respectful online learning environment. Moreover, our support channels are readily available to address any concerns or issues that may arise during online learning sessions, ensuring that students and staff feel supported and protected throughout their virtual educational experiences.

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.

**Online & Acceptable use Policy: <https://www.mulberryutc.org/wp-content/uploads/2022/01/MUTC-E-safety-and-Acceptable-Use-Policy-November-2021-UPDATED-8.11.21.pdf>**

**Pupil Behaviour Policy. <https://www.mulberryutc.org/wp-content/uploads/2023/04/MUTC-Behaviour-Policy-2023-v.2.pdf>**

At our school, we are dedicated to ensuring the ongoing safety and well-being of our students in the digital landscape. To achieve this, we have implemented a continuous process of risk assessment and review in the realm of Online Safety.

Our approach involves regular and systematic evaluations of our online safety policies, practices, and technologies. This includes assessing the effectiveness of our

filtering and monitoring systems, evaluating the relevance of our online safety curriculum, and examining emerging online risks and trends. We actively seek feedback from students, staff, and parents to inform our assessments and drive improvements.

Through this ongoing commitment to risk assessment and review, we aim to maintain a dynamic and adaptive online safety framework that evolves alongside the ever-changing digital landscape. Our goal is to provide our students with a safe and secure online environment where they can learn, explore, and thrive while being protected from online risks.

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.

## 29. 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.

### 30. SO-CALLED HONOUR-BASED ABUSE

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

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

#### **Female Genital Mutilation**

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

Mulberry UTC is unwavering in its commitment to addressing concerns related to female genital mutilation (FGM) in accordance with the Multi-agency statutory guidance. In the event of suspected FGM, our school follows a precise protocol, initiating an immediate report to the police. Simultaneously, the designated safeguarding lead is informed to ensure internal coordination. This information is then swiftly shared with relevant authorities, such as local child protection services and healthcare professionals. Mulberry UTC prioritises close collaboration with external agencies to conduct comprehensive risk assessments and ensure the safety and well-being of individuals involved. Our staff undergo regular training to adeptly recognise and respond to potential signs of FGM, contributing to a proactive approach to prevention. Additionally, we are committed to raising awareness among students, parents, and the wider community, emphasising education on the risks and consequences of FGM. By adhering to these specific steps outlined in the government's statutory guidance, Mulberry UTC aims to effectively address and prevent instances of FGM, prioritising the safety and welfare of our students.

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 [fmf@fcdo.gov.uk](mailto:fmf@fcdo.gov.uk).

**[School to reference 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).

## **31. 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).

Our school operates in accordance with the Statutory guidance on the Prevent duty, which delineates our responsibilities under the Counter-Terrorism and Security Act 2015. Specifically, we are committed to safeguarding our students and protecting them from the risks of radicalisation and extremism, as outlined in paragraphs 57-76 of the guidance for schools. Additionally, further education colleges have their specific statutory guidance.

As part of our Prevent Duty obligations, our school diligently completes and reviews Prevent Risk Assessments and Prevent Checklists. These assessments are vital tools that guide our efforts to identify and address potential risks, ensuring that we maintain a vigilant and proactive stance in safeguarding our students.

We place great importance on staff training opportunities to equip our team with the knowledge and skills needed to fulfil our Prevent Duty effectively. Furthermore, relevant aspects of our curriculum enable pupils to engage in open discussions on issues related to religion, ethnicity, and culture, fostering an inclusive and tolerant learning environment. Our school also actively promotes fundamental British Values as an integral part of our SMCS (spiritual, moral, social, and cultural education) program. Through these measures, we aim to empower our students to become informed, responsible, and respectful citizens who contribute positively to our diverse society.

In LBTH the Prevent Education Officer is Eleanor Knight  
[Eleanor.Knight@towerhamlets.gov.uk](mailto:Eleanor.Knight@towerhamlets.gov.uk).

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

## 32. 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.

In accordance with KCSIE 2023 Part 2, our school's Child Protection Policy incorporates comprehensive procedures to minimise the risk of child-on-child abuse. These procedures include but are not limited to:

- **Preventive Education:** We implement age-appropriate educational programs that raise awareness about respectful behaviour, personal boundaries, and healthy relationships. These programs are integrated into our curriculum to foster a culture of mutual respect and understanding.
- **Supervision and Monitoring:** Our staff maintains vigilant supervision of students in all school settings, with particular attention to areas where interactions may occur. We also employ monitoring mechanisms to identify and address any emerging issues promptly.
- **Reporting Mechanisms:** We have clear and accessible reporting mechanisms in place for both students and staff to report any concerns related to child-on-child abuse. This includes designated personnel responsible for receiving and responding to reports.



Regarding allegations of child-on-child abuse, our Child Protection Policy outlines the following procedures:

- **Recording:** All allegations are recorded in a confidential manner, with detailed information about the incident, individuals involved, and any witnesses. These records are securely maintained.
- **Investigation:** Allegations are thoroughly investigated by designated staff or external agencies as appropriate. The investigation process includes interviewing all relevant parties, collecting evidence, and assessing the veracity of the allegations.
- **Action:** If an allegation is substantiated, appropriate action is taken in line with our school's disciplinary policies. This may involve support and intervention for both the victim and the perpetrator, as well as engaging external agencies where necessary.

In terms of supporting victims, perpetrators, and other children affected by child-on-child abuse, our Child Protection Policy includes the following processes:

- **Victim Support:** Victims receive immediate support and care tailored to their needs, which may include counselling, access to pastoral care, and involvement of external agencies as required.
- **Perpetrator Support and Intervention:** Perpetrators are offered appropriate support and intervention aimed at addressing their behaviour and preventing reoccurrence, while ensuring the safety of others.
- **Support for Other Children:** Any children affected by child-on-child abuse are provided with the necessary support, which may include counselling, peer support, and educational interventions to address their emotional and psychological well-being.

Our commitment to safeguarding extends to all aspects of our school community, and we are dedicated to maintaining a safe and supportive environment where every child's well-being is a top priority.

### 33. 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 Safeguarding Hub.

## **Sexual Harassment**

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

Sexual Harassment may include the following:

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

In accordance with Keeping Children Safe in Education 2023 Part 5, our school is committed to taking immediate and comprehensive actions when reports of child-on-child sexual violence and sexual harassment are brought to the attention of the Designated Safeguarding Lead (DSL). The response and actions we take include:

**Record Keeping:** All reports of child-on-child sexual violence and sexual harassment are meticulously recorded in a confidential and secure manner. These records include detailed information about the incident, individuals involved, witnesses, and any evidence available. Our record-keeping practices are in compliance with statutory requirements and serve as a vital resource for subsequent actions and assessments.

**Written Risk Assessments:** Upon receiving a report, our DSL initiates a thorough written risk assessment to evaluate the seriousness of the incident and any potential risks involved. This assessment guides our response and intervention strategies, ensuring that they are proportionate to the nature and severity of the reported incidents.

**Ongoing Response:** We ensure that the response to reports of child-on-child sexual violence and sexual harassment is prompt, consistent, and prioritises the safety and well-being of all students involved. Our DSL collaborates with relevant internal and external agencies to conduct a comprehensive investigation and gather evidence. Based on the findings of the assessment, appropriate actions are taken, which may

include disciplinary measures, support for victims, and interventions for perpetrators.

**Support for Victim and Perpetrator:** Our school is committed to providing immediate and tailored support for both victims and perpetrators. Victims receive immediate and compassionate care, which may include counselling, access to pastoral care, and involving external agencies if required. Perpetrators are offered appropriate support and intervention to address their behaviour, prevent reoccurrence, and ensure the safety of others.

Through these comprehensive response and action measures, we aim to maintain a safe and nurturing educational environment, where the safety, well-being, and development of all our students are paramount.

## 34. 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 2020.

Our school has established a comprehensive response framework to address issues related to Youth Produced Sexual Imagery, aligning with the guidance provided by UKCIS in their non-statutory document, "Sharing Nudes and Semi-Nudes: Advice for Education Settings working with Children and Young People 2020."

Key components of our response include:

- **Preventative Education:** We integrate age-appropriate lessons into our curriculum to educate students about the potential risks and consequences of sharing sexual imagery. These lessons promote responsible online behaviour, consent, and digital citizenship.
  - **Reporting Mechanisms:** We provide clear and confidential reporting mechanisms for students who encounter or are affected by Youth Produced Sexual Imagery. This includes designated staff and support channels where students can seek help or report incidents safely.
  - **Immediate Support:** In the event of an incident involving Youth Produced Sexual Imagery, we offer immediate support to the individuals affected. This support includes counselling services, access to pastoral care, and guidance on addressing emotional and psychological well-being.
  - **Legal and Digital Consequences:** Our students are educated on the legal and digital consequences of engaging in or sharing explicit imagery, ensuring they understand the potential ramifications of their actions.
  - **Collaboration:** We collaborate closely with external agencies and organisations specialising in online safety to ensure a comprehensive approach to addressing issues related to Youth Produced Sexual Imagery.
- Through these measures, we aim to create a safe and supportive school environment where students are educated, informed, and equipped to make responsible choices when navigating the digital landscape.

## 35. 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 2023 and Behaviour in Schools. Advice for Head teacher and School Staff (September 2022).

Our school is committed to maintaining a safe and inclusive learning environment, and our response to incidents of bullying and cyberbullying is guided by our comprehensive Anti-Bullying and Cyberbullying Policy. This policy outlines the procedures, support mechanisms, and disciplinary measures in place to address such incidents. We prioritise the well-being of our students and the prevention of bullying behaviours, fostering a culture of respect, tolerance, and empathy within our school community.

## 36. 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)



### 37. 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.

### 38. 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.

### 39. PRIVATE FOSTERING

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

Staff should be vigilant about children who are in private fostering arrangements and report concerns to the DSL, who will notify the Local Authority through a MASH

referral, as set out in the THSCP Multi-Agency Private Fostering Guidance (January 2022). The Local Authority will check the arrangement is suitable and safe for the child in accordance with the Private Fostering statutory guidance.

#### 40. 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)

#### 41. 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.

## **42. 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 MASH.

## **43. 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.
- 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
- Our internal staff safeguarding reporting system is managed through CPOMS, while external concerns from parents can be directed to the DSL at [jkibela-purnell@mulberryschoolstrust.org](mailto:jkibela-purnell@mulberryschoolstrust.org) for prompt attention and response.
- seek support for yourself if you are distressed.

#### 44. 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.

Our school's Early Help strategy is designed to provide timely and targeted support to children and families facing various challenges, ensuring their well-being and educational progress. Within our school setting, the Early Help response encompasses the following key components:

- **Internal Pastoral Support System:** We maintain a dedicated team of pastoral staff who are readily available to provide initial support and guidance to students and families. These staff members play a pivotal role in identifying emerging concerns and facilitating access to appropriate services.
- **Provision of Additional Support:** For students requiring additional support, we offer a range of interventions tailored to their specific needs. These may include mentoring, counselling, educational support, and emotional well-being programs.
- **Early Help Assessment (EHA):** When concerns require a more comprehensive assessment, an Early Help Assessment (EHA) may be initiated. This assessment is a collaborative process involving school staff, parents, and external agencies, where needs and strengths are identified, and a plan for support is developed.
- **EHA Reviews and Team Around the Child/Family Meetings:** In cases requiring multi-agency involvement, we conduct regular EHA reviews and convene Team Around the Child/Family (TAC/TAF) meetings. These gatherings bring

together professionals from various agencies to coordinate support and services, ensuring a holistic and effective approach to meeting the child or family's needs.

- **Referrals to Children's Social Care:** If the threshold for intervention by Children's Social Care is met, we follow established protocols for making referrals. These referrals are made with careful consideration for the child or family's safety and well-being.

Our Early Help strategy underscores our commitment to early intervention and collaborative working, ensuring that children and families receive the necessary support to thrive academically and personally.

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

**LBTH Early Help Hub:**  
0207 364 5006 (option 2)

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

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

**MASH:**  
020 7364 5006 (Option 3) 020 7364 5601/5606

**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.

## 45. HANDLING THE REPORTING OR SHARING OF CONCERNS

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.

Our school is committed to maintaining open and transparent communication with parents. We will notify parents promptly in most circumstances, especially when it involves matters concerning their child's safety, well-being, or significant academic progress. However, there may be situations, such as ongoing investigations or legal considerations, where immediate parental notification may not be possible. In such cases, we will ensure that parents are informed as soon as it is feasible and appropriate to do so, while always prioritising the best interests of the child. Our commitment to safeguarding and supporting our students remains unwavering, and

we value the partnership with parents in ensuring their child's success and well-being.

#### 46. 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 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.

Gaining consent is a fundamental aspect of our safeguarding procedures, but there are instances where it may not be possible or appropriate, particularly when doing so could put the child at further risk of harm. In such cases, our primary obligation is to prioritise the child's safety and well-being. When consent cannot be obtained, we will act in accordance with our statutory duty and safeguarding protocols, taking immediate and necessary steps to protect the child from harm and ensuring that all actions are carried out in the child's best interests. Our decision-making process will

always consider the potential risks and benefits to the child, guided by the principle of ensuring their safety and welfare above all else.

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.

#### 47. REFERRING TO CHILDREN'S SOCIAL CARE

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

**LBTH Multi-Agency Safeguarding Hub:**

020 7364 5006 (Option 3) 020 7364 5601/5606

**Child Protection Advice Line:**

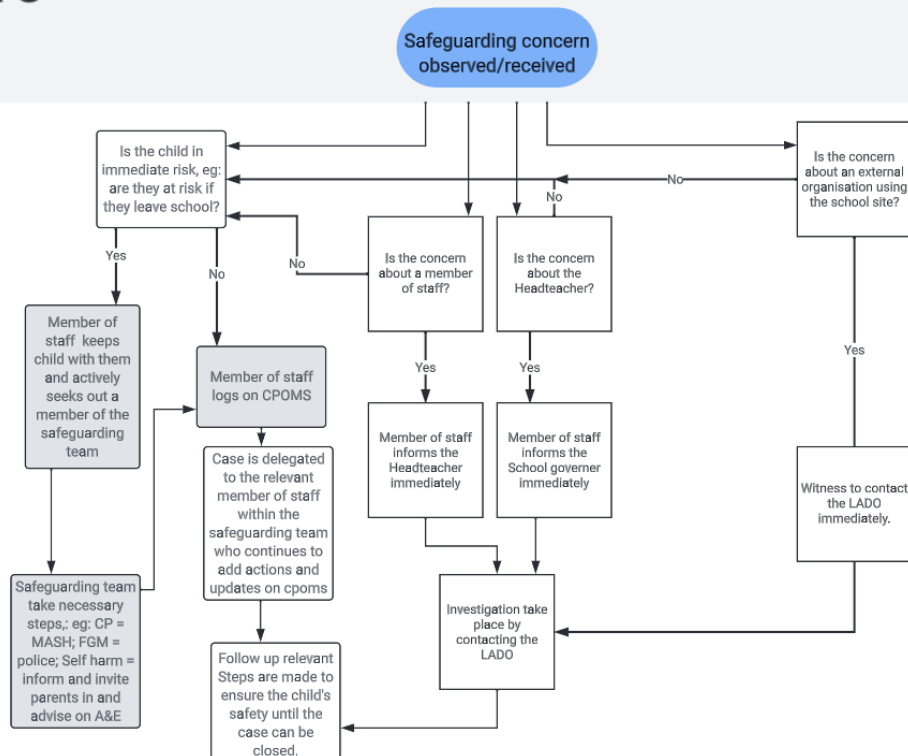
020 7364 3444

The DSL will contact CPAL/MASH in the first instance to seek advice and guidance. When the DSL completes a MASH referral form and sends it securely to the Multi-Agency Safeguarding Hub, the referral form will be accurate and sufficiently detailed to enable the MASH Assessment and Intervention Team to make a decision on the level of statutory response required in accordance with the LBTH Thresholds Guidance.

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



# Safeguarding Procedures at MUTC



## 48. 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 Tower Hamlets Threshold Guidance (Appendix D) the DSL will first make contact 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: MASH Poster

Appendix 2: School Record of Concern Form (if not online)

Appendix 3: MASH Interagency Referral Form

