HALLEY PRIMARY SCHOOL

Safeguarding & Child Protection Policy

2026–2027

Structure Guide Colour Code

- Updates for 2026/27
- School specific information and practice

September 2026



Table of Contents

SECTION A....3
1. Core Safeguarding Principles....3
2. Purpose of Policy....3
3. Safeguarding Legislation and Guidance....4
4. Pan London & Tower Hamlets Safeguarding Children Partnership Guidance....5
5. Tower Hamlets Safeguarding Children Partnership....5
6. Tower Hamlets Local Authority Strategy....6
7. Key Definitions....6
SECTION B – SAFEGUARDING LEADERSHIP, ROLES & CULTURE....7
8. Roles and Responsibilities....7
9. Rights of the Child....11
10. Voice of the Child....12
11. Whistleblowing....14
12. Reporting of Allegations Against Staff & Concerns That Do Not Meet the Harm Threshold....14
13. Staff Safeguarding Training including Training for Governors....16
14. Visitors....17
15. Volunteers....18
SECTION C – TAKING SAFEGUARDING ACTION....19
16. Early Help....19
17. Child Protection Procedures - Taking Safeguarding Action....20
18. Handling the Reporting or Sharing of Concerns....21
19. Confidentiality and Information Sharing (including consent)....22
20. Referring to Children's Social Care....23
21. Escalation Procedures....24
Appendices....24

Document Status

This document is based on guidance and model materials provided by the Tower Hamlets Education Safeguarding Service and has been adapted to reflect the context, needs and safeguarding arrangements of Halley Primary School.

The Governing Body is responsible for ensuring that the Safeguarding & Child Protection Policy is effective and compliant with statutory requirements. This Practice Guidance supports the implementation of the policy and is reviewed regularly by school leaders to reflect changes in local and national safeguarding guidance.

This policy sets out Halley Primary School's approach to safeguarding and child protection: our principles, the legislative framework, roles and responsibilities, and the core procedures every member of staff must follow. It is built on the London Borough of Tower Hamlets' Sept 2026 Model Child Protection Policy Guide, which has been written in accordance with Keeping Children Safe in Education 2026 and local safeguarding arrangements including the Tower Hamlets Safeguarding Children Partnership Supplementary Guidance documents on Child Protection Procedures and the Management of Allegations and Concerns that do not meet the Harm Threshold; adapted for Halley's context.

Detailed guidance relating to vulnerable groups, indicators of abuse and specific safeguarding risks is contained within the **Halley Safeguarding Practice Guidance 2026-27**, which should be read alongside this policy.

The guidance is reviewed alongside this policy but not subject to the annual governing body ratification, enabling it to be updated promptly in response to changes in local and national and local safeguarding guidance.

Ratified by the Full Governing Body: [*date*]

Headteacher signature: ……

Chair of Governors signature: ……

Shared with staff: September 2026

Review date: September 2027

SECTION A

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, trainee teachers, 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 **Halley Primary School**.

2. Purpose of Policy

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

This policy is available on the school website and may be obtained from the school office on request. It is shared with all staff during induction and forms part of annual safeguarding training and updates. Governors receive and review the policy annually.

3. Safeguarding Legislation and Guidance

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

Legislation

- Section 175 of the Education Act 2002 (local maintained schools)
- Children Act 1989 and 2004
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- The Safeguarding Vulnerable Groups Act 2006
- The School Staffing (England) Regulations 2009 – covering safer recruitment and Single Central Record requirements
- Counter-Terrorism and Security Act 2015 – includes the Prevent Duty
- Serious Crime Act 2015 – includes mandatory reporting of FGM
- Human Rights Act 1998
- The Equality Act 2010, and the Department for Education's *The Equality Act 2010* and schools advice (updated 28th June 2018)
- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025
- The Safeguarding Vulnerable Groups Act 2006

Guidance

- Working Together to Safeguard Children 2023 (HM Government December 2023, updated 18th March 2026)
- Keeping Children Safe in Education 2026 (Department for Education, 1st September 2026)
- Information Sharing: advice for practitioners providing safeguarding services (Department for Education, 2015, Updated May 2024)
- What to do if you're worried a child is being abused 2015 (Department for Education, March 2015)
- Early Years Foundation Stage Statutory Framework for group and school-based providers (Updated July 2025)
- The Teacher Standards 2012 (updated 13th December 2021)

- DfE 'Working together to improve school attendance
- Mobile Phones in Schools (Department for Education, February 2026)

4. Pan London & Tower Hamlets Safeguarding Children Partnership Guidance

- The following Pan-London and Tower Hamlets Safeguarding Children Partnership guidance has informed the content of this policy:
- London Child Protection Procedures revised 8th Edition (London Safeguarding Children Board, 30th March 2026)
- Tower Hamlets Safeguarding Children Partnership Levels of Need Guidance (September 2023)
- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Child Protection Procedures - September 2026
- Tower Hamlets SCP LADO Procedures and Flowchart re Allegations made against staff working in the children's workforce - Information about reporting and managing allegations
- Tower Hamlets SCP Supplementary Guidance for Schools and Education Settings on Managing Allegations of Abuse against Staff and Concerns that do not meet the harm threshold – September 2026
- Tower Hamlets SCP Multi-Agency Escalation and Resolution Policy

5. Tower Hamlets Safeguarding Children Partnership

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

More information about the Tower Hamlets Safeguarding Children Partnership can be found on the website: www.thscp.org.uk

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

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

The school is committed to engaging with the THSCP multi-agency safeguarding training offer and the borough's Designated Safeguarding Leads Forums, participating in THSCP/LA's Section 175/157 School Safeguarding Audit Cycles, providing key information about children relevant to keeping children safe, participating fully in the Rapid Review process and Child Safeguarding Practice Reviews, and supporting the agreed safeguarding priority areas for 2025-2027, which are Think Family and Adolescent Safeguarding.[^1]

6. Tower Hamlets Local Authority Strategy

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

- TH: Is Accelerate: The Tower Hamlets Children and Families Partnership Strategy 2024-2029
- Tower Hamlets Special Educational Needs, Disabilities and Inclusion Strategy 2024-2029
- Tower Hamlets Early Help Strategy 2025-28: Going further to make support easy to access for all families
- VAWG and Women's Safety Strategy 2024-2029
- Tower Hamlets Serious Violence and Exploitation Strategy

7. Key Definitions

Safeguarding and promoting the welfare of children is:

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

SECTION B – SAFEGUARDING LEADERSHIP, ROLES & CULTURE

8. Roles and Responsibilities

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

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

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

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

ROLE	POSTHOLDER	CONTACT DETAILS
Headteacher Designated Safeguarding Lead	Shoshannah Thompson	head@halley.towerhamlets.sch.uk or 020 7265 8061
Assistant Headteacher EYFS, Inclusion & Behaviour (DDSL)	Shan Hardy	shardy25.211@halley.towerhamlets.sch.uk or 020 7265 8061
Assistant Headteacher Teaching, Learning & Curriculum	Tom Weddell	or 020 7265 8061

ROLE	POSTHOLDER	CONTACT DETAILS
(DDSL)		
Safeguarding Link Governor	Belinda King	BKing@halley.towerhamlets.sch.uk or 020 73753626
Chair of Governors	Jo Riley	JRiley@halley.towerhamlets.sch.uk
Prevent Lead	Shoshannah Thompson	or 020 7265 8061
Looked After Children Lead (LAC)	Shan Hardy	shardy25.211@halley.towerhamlets.sch.uk or 020 7265 8061
Mental Health Lead	Shan Hardy	shardy25.211@halley.towerhamlets.sch.uk or 020 7265 8061
SENDCo	Alice Tomlinson	or 020 7265 8061

During term time, at least one of the DSL or a Deputy DSL is available on-site during the school day for staff to discuss any safeguarding concern in person. The DSL's timetable is structured to allow this; where the DSL is off-site (for example at a meeting or training), a named Deputy DSL covers in person.

The DSL, or a Deputy DSL in the DSL's absence, is contactable by phone at all times during the school day, including when off-site.

In exceptional circumstances — for example if both the DSL and all Deputy DSLs are unexpectedly off-site at the same time — availability by phone or video call is an acceptable substitute for in-person contact, provided the member of staff can still speak to the DSL/Deputy DSL directly and in real time. This is a last resort, not a routine arrangement, and any concern raised this way must still be recorded on CPOMS as soon as possible afterwards.

During school closures (holidays), safeguarding queries are directed to the Child Protection Advice Line.

The Designated Safeguarding Lead (DSL) is responsible for overseeing the safeguarding aspects of both standard and non-standard transition points. This includes ensuring that child

protection files are transferred to the receiving school separately from the main pupil file, and that this occurs as soon as possible, ideally within five school days of the child starting at the new setting.

If Halley Primary has not received safeguarding records for new pupils within five school days of their start date, the DSL will proactively contact the previous school to request the records. Follow-up will continue until the safeguarding records have been received or the previous school has confirmed that no safeguarding records are held.

All staff should recognise that as frontline workers they are in a vitally important position to identify concerns early, provide help and support to children, promote children's welfare, and prevent concerns from escalating. All staff should hold an attitude of **"it could happen here**

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the child.
- Provide a safe environment in which children can learn.
- Read and understand at least Part One of KCSIE 2026.
- Be aware of the school's safeguarding systems, policies and procedures, and complete safeguarding induction training, including online safety and the school's approach to filtering and monitoring.
- Know who the DSL and Deputy DSLs are and how to reach them (see above).
- Receive safeguarding and online safety updates at least annually, and more often where needed.
- Be aware of Halley's Early Help offer and the Team Around the Child/Family (TAF) process and understand their role in identifying children who may benefit from support before things escalate to statutory intervention.
- Understand the referral pathway to Children's Social Care via MAST, and support social workers in decision-making about individual children, in collaboration with the DSL.
- Recognise that a child may not feel ready, or know how, to tell someone they are being abused, exploited or neglected, and may not recognise their own experience as harmful.
- Promote dialogue where every child feels listened to and understood, and help children understand their right to safety, privacy and protection from harm.
- Avoid victim-blaming attitudes challenge them professionally if they arise.
- Maintain appropriate confidentiality when handling individual cases.

- Be alert to technology-facilitated abuse and other emerging safeguarding risks, and to behaviours that may indicate a child is at risk.
- Speak to the DSL if unsure how to handle a safeguarding matter.

All staff have a responsibility to report safeguarding concerns immediately to the DSL or, in their absence, to a Deputy DSL. This should be done face-to-face or via CPOMS without delay. **No safeguarding concern should ever be left unreported.**

All members of staff take responsibility for writing up clear and comprehensive safeguarding concerns using the school's safeguarding record system. Through the DSL's oversight, safeguarding records include:

- a clear and comprehensive summary of the concern
- factual and objective (using the child's own words where applicable)
- the date, time, and any relevant context
- details of how the concern was followed up and resolved, and
- a record of any action taken, decisions reached, and outcomes

All records **must** be completed on CPOMS and submitted promptly. If in doubt about recording requirements, staff should discuss with the DSL (or a deputy).

If uncertain about whether something constitutes a safeguarding issue, staff should **always** still speak to the DSL. It is better to share a concern that turns out to be unfounded than to miss a potential sign of harm.

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

Teachers, Including the Headteacher

In addition to the above, teachers (including the Headteacher) have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the profession, as set out in the Teachers' Standards.
- Personally report to the police any case where it appears an offence may have been committed against a child under 18 in relation to **female genital mutilation**, in line with the FGM mandatory reporting duty (this is a personal duty on the individual teacher — it cannot be delegated to the DSL).

9. Rights of the Child

The school upholds the human rights of children in accordance with the Human Rights Act 1998. It is unlawful for schools to act in a way that is incompatible with the European Convention on Human Rights.

As a UNICEF Rights Respecting School, Halley Primary School also promotes and upholds the principles of the United Nations Convention on the Rights of the Child (UNCRC), which are embedded throughout the school's safeguarding culture, ethos and practice.

Specifically, the school embeds and upholds the following Convention rights 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), including a duty to protect an individual's physical and psychological integrity.

Article 14: The right to enjoy Convention rights and freedoms without discrimination.

Protocol 1, Article 2: The right to education.

In accordance with the Equality Act 2010, the school must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). The school is committed to supporting and taking positive action towards children with regard to particular protected characteristics – including disability, sex, sexual orientation, gender reassignment and race – who may be at a disadvantage and disproportionately vulnerable.

The School is committed to safeguarding and promoting the welfare of all children, including those with protected characteristics such as disability, sex, sexual orientation, gender reassignment, and race.

We recognise that some pupils may face additional barriers or risks as a result of these characteristics. Where appropriate, and where it can be shown to be proportionate, the school will take positive action to address specific disadvantages or meet identified needs.

This includes our duty to make reasonable adjustments for disabled pupils, including those with long-term conditions, in line with the Equality Act 2010. For example, the school may take targeted steps to support girls if evidence suggests they are disproportionately affected by sexual harassment or harmful gender-based behaviours.

The school shares the London Borough of Tower Hamlet's commitment to promoting equality, diversity, and inclusion in every aspect of school life. We believe every child, regardless of background, has the right to feel safe, valued, and included, and that a diverse and inclusive environment supports both wellbeing and attainment. This is reflected in how

we recruit and develop staff, design our curriculum, and deliver relationships and health education.

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

Halley Primary School takes a proactive, whole-school approach to combating racism and discrimination. Our curriculum includes diverse literature, anti-racist content, and historical and contemporary perspectives that reflect the experiences of marginalised communities. Pupils are encouraged to engage critically with issues of identity, race, and social justice.

We work closely with families and local community organisations to ensure our values are reflected in all aspects of school life. Feedback from families helps us to improve inclusivity and cultural responsiveness.

The school regularly analyses school data – such as behaviour incidents and attainment – to identify and address any racial disparities. Clear reporting mechanisms are in place for pupils and staff to raise concerns related to discrimination.

Through inclusive teaching, strong community partnerships, and transparent accountability systems, we aim to create a safe, respectful and anti-racist environment where every child feels seen, heard, and valued.

10. 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.

As a Rights Respecting School, Halley promotes the principles of the United Nations Convention on the Rights of the Child (UNCRC), particularly:

Article 12 – Every child has the right to express their views and to have those views given due weight.

Article 13 – Every child has the right to seek, receive and share information and ideas.

Article 19 – Children have the right to be protected from all forms of violence, abuse, neglect and exploitation.

These rights underpin the school's commitment to ensuring that every child feels safe, listened to, respected and supported to speak about any worries or concerns. They also reinforce our expectation that children will be actively involved, where appropriate, in decisions affecting their safety and wellbeing.

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

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

Staff need to be aware of and promote the systems in place at the school which enable children to share their concerns and report abuse confidently. Children need to be assured that their concerns will be taken seriously by staff and action will be taken to safeguard and protect them. It is also important that staff determine how best to build safe and trusted relationships with children and young people which facilitates communication and the sharing of concerns.

At Halley Primary School, we are committed to ensuring that all pupils feel safe, heard, and empowered to share concerns. In line with *Keeping Children Safe in Education 2026 (Part 2)*, we have clear, accessible, and well-promoted systems in place to support pupil voice and disclosures.

As a **Rights Respecting School**, we promote children's right to be heard through:

- A robust **PSHE curriculum** and Relationships & Sex Education programme
- Weekly **Community Circles**, where pupils meet in mixed-age groups with a consistent adult to build trusted relationships, reflect, and share concerns
- Classroom-based "WWW (Worries, Wonders, What If…)" boxes for anonymous disclosures
- Signposting of **trusted adults** and how to seek help in all classrooms
- Clear signposting of how to ask for help in classrooms and corridors
- Access to trained Mental Health First Aiders and an on-site Play Therapist (self-referral supported)

Children are taught how to identify trusted adults and how to speak up if they feel unsafe. Our use of CPOMS ensures all concerns raised by children are recorded and followed up appropriately.

These systems are regularly reviewed to ensure they are developmentally appropriate, understood by all children, and accessible to all, including those with SEND or additional needs.

11. 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 must follow the school's **Whistleblowing Policy** if they have concerns about the conduct of colleagues or practices within the school that may put pupils at risk.

This includes concerns that are not being addressed through normal safeguarding procedures. The policy outlines how staff can raise concerns confidentially and without fear of reprisal.

All staff are reminded of the Whistleblowing Policy during induction and as part of the annual safeguarding update.

Staff can also contact the Local Authority Designated Officer (LADO) or the NSPCC Whistleblowing Helpline if they feel unable to raise concerns internally.

LBTH Local Authority Designated Officer (LADO): Melanie Benzie

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

Telephone: 0207364 0677

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

12. 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, trainee teachers 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

2026 Part 4 and the THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – September 2026.

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

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

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

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

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

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

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

LBTH Local Authority Designated Officer (LADO): Melanie Benzie

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

Telephone: 0207364 0677

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

Concerns about staff that do not initially seem to fulfil the allegation criteria set out above are known as Concerns that do not meet the Harm Threshold, sometimes called low-level concerns, not because they are insignificant but because they do not initially seem to meet the harm threshold. Staff should report and self-report such concerns in accordance with the

school's procedures, which are found in the school's Staff Code of Conduct. Contact will be made with the LADO for advice and guidance when appropriate as part of the Headteacher's or Chair of Governor's response to the report.

Staff must follow the school's **Safer Care and Professional Code of Conduct Policy** (pages 15–19) and the **Staff Handbook** (page 56-57), which set out expectations for professional behaviour and the procedures for reporting concerns that do not meet the harm threshold.

These policies explain how staff can raise **low-level concerns**—such as inappropriate language, boundary-blurring, or unprofessional conduct—which may not meet the threshold for referral to the Local Authority Designated Officer (LADO), but could indicate a pattern of behaviour.

All staff have a duty to report such concerns to the Headteacher (or the Chair of Governors if the concern relates to the Headteacher). The culture at Halley Primary encourages openness, transparency, and early reporting to safeguard pupils and protect staff.

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.

[*Note: the Sept 2026 model extends this section to explicitly cover trainee teachers alongside staff and volunteers – worth checking your Managing Allegations Procedures name them too.*]

13. Staff Safeguarding Training including Training for Governors

School staff, Governors and Trustees are required to have compulsory safeguarding training as part of their induction and to maintain their knowledge through regular safeguarding training and updates. The safeguarding training at induction and indeed as part of continuous professional development should include Online Safety covering among other things an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring systems in place at the school n accordance with the DfE's Digital and Technology Standards (2023).

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.

All staff, volunteers, agency staff, and governors at Halley Primary School receive safeguarding training in line with statutory guidance.

As part of induction, all new staff and volunteers are provided with:

- The Child Protection and Safeguarding Policy
- Safer Care and Professional Code of Conduct

- Staff Handbook and Termly Safeguarding Action Plan
- Keeping Children Safe in Education 2026 (Part 1 or Annex A)

These documents are explained, and all staff must sign to confirm they have read and understood them.

Staff receive full safeguarding training at least every three years, with annual refresher sessions delivered each September. Weekly safeguarding updates are shared in staff briefings and phase meetings to maintain a strong safeguarding culture.

Training topics include: referral procedures, professional boundaries, child-on-child abuse, FGM, online safety, exploitation, radicalisation, Prevent Duty, Early Help and the Think Family approach.

All staff also complete Prevent awareness training and are encouraged to engage in regular safeguarding dialogue. New staff receive this training during induction. Safeguarding policies are accessible via the shared drive, the school website, and in hard copy in key locations.

Learning from safeguarding training is monitored through termly spot checks, staff surveys, and professional conversations during line management meetings. Staff are also encouraged to ask questions, seek clarification, and demonstrate their knowledge during phase briefings and pastoral meetings.

All training is recorded in the Continuous Professional Development Training Register. Statutory safeguarding training is delivered and recorded through National College, including policy reading, with automated reminders and deadlines. SLT and HR Manager can view completion status for all staff, volunteers and agency staff, and reviews this half-termly. Where any training is missed, catch-up is arranged promptly and gaps are escalated to SLT. No staff, volunteers, or agency staff may work unsupervised until induction and safeguarding training is complete.

DSLs and DDSLs receive regular (at least termly) training to ensure they remain up to date with national and local priorities. Governors are invited to attend safeguarding training and receive a standing safeguarding update at each Full Governing Board meeting.

All staff are expected to be proactive in maintaining their safeguarding knowledge and confident in seeking support where needed.

14. Visitors

Halley Primary School is committed to ensuring the safety and wellbeing of pupils during all visits by external individuals.

All visitors must report to the school office, sign in using the inventory system, present valid photo ID, and wear a visitor badge at all times. Staff will challenge unidentified or unregistered visitors and report them to the Headteacher, LADO, or local authority where appropriate.

If the visitor is unknown to the school, credentials and the purpose of the visit will be verified before entry is permitted.

Visitors attending in a professional capacity (e.g. social workers, police officers, educational psychologists, contractors, family members and community organisations) must present photo ID and either:

- Show a valid enhanced DBS certificate, or
- Be confirmed in writing by their organisation as having undergone appropriate safeguarding checks

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.

External speakers and organisations must be vetted to ensure their views are consistent with the school's values and do not promote extremism. All visitors, including speakers, will be accompanied by a member of staff throughout their visit.

Clubs or groups using the school's name or premises are monitored to ensure compliance with safeguarding expectations.

All visitors are provided with a safeguarding leaflet on arrival outlining the school's safeguarding procedures and designated contacts.

15. Volunteers

From September 2026, volunteers who undertake teaching, training, instruction or supervision of children frequently – on more than three days in a thirty-day period, or overnight – are engaged in regulated activity and require the appropriate DBS check, including a check of the children's barred list.

Volunteers who are not undertaking regulated activity are still subject to a written risk assessment to determine the level of safeguarding check required, and are never left unsupervised with pupils until that assessment is complete.

As with visitors, all volunteers sign in at the school office, wear identification, and are accompanied by a member of staff for the duration of their time on site unless the DSL has confirmed in writing that unsupervised access is appropriate.

SECTION C – TAKING SAFEGUARDING ACTION

16. Early Help

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

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

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

At Halley Primary School, we recognise that early intervention is vital to improving outcomes for children and families. Our **Early Help strategy** is built around the belief that providing timely, proportionate, and coordinated support can prevent escalation to more serious safeguarding concerns.

The **DSL and Pastoral Team** lead on Early Help and will liaise with families, professionals, and relevant agencies to coordinate support. This may include initiating an **Early Help Assessment (EHA)**, chairing or attending **Team Around the Child/Family (TAC/TAF) meetings** and ensuring regular **EHA Reviews** take place.

Our internal Early Help offer includes:

- Pastoral support from the **SENDCo, Play Therapist, and Mental Health Lead**
- Regular communication with families through **home visits, phone calls, and in-school meetings**
- Access to targeted interventions, including **counselling, parenting support, and mentoring**
- Referral to external services such as **THEWS, CAMHS, Children's Social Care, and community organisations**

Where appropriate, and to aid multi-agency coordination, the DSL may refer cases to the **Tower Hamlets Social Inclusion Panel**.

We apply the **Think Family approach** in our Early Help work—understanding that a child's welfare is closely linked to the well-being of the whole family. We ensure support considers parental mental health, domestic abuse, substance misuse, housing, and financial stressors.

Where concerns persist or the child's needs escalate, we will not hesitate to escalate the response and make a **referral to Children's Social Care** in line with the **Tower Hamlets Threshold Guidance**.

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

020 7364 5006 (Option 3) 020 7364 3444/5601/5606/5358/7796

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

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

MAST:

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

Child Protection Advice Line

020 7364 3444

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

17. Child Protection Procedures - 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:

- If a **staff member believes a child is at immediate risk of harm**, they **must inform the DSL or Deputy DSL in person without delay**, before doing anything else. This takes priority over all other activity.
- In an **emergency**, take immediate action to protect the child, including calling **999** if necessary.
- **Report your concern** to the **DSL or Deputy DSL immediately**—this takes **priority over all other activity** and must be done **no later than the end of the school day**.
- The DSL will review any reported concerns **as soon as possible and within 24 hours** of submission.
- **Urgent concerns** will be prioritised on the same day. If the DSL is unavailable, a Deputy DSL will take immediate responsibility.

- **Do not begin your own investigation** under any circumstances.
- Share information only on a **need-to-know basis**—do not discuss the issue with colleagues, friends or family.
- **Complete a record of concern using CPOMS**. All entries must be a **clear, precise, and factual** of the concern or disclosure. If CPOMS is not accessible, staff must **report directly and urgently in person to** a member of the Safeguarding or SLT team in person.
- If the concern is causing distress, staff are encouraged to **seek support** from the DSL or SLT (staff wellbeing matters too).

Safeguarding is everyone's responsibility—Delays in reporting can place children at further risk. Always act **immediately** and in the **best interests of the child.**

18. Handling the Reporting or Sharing of Concerns

All staff must be aware that when a child discloses abuse, including neglect or exploitation, it may be extremely difficult for them. Children may feel frightened, ashamed, or believe they are to blame. Staff must **never make a child feel they are creating a problem** by reporting abuse or that they will be in trouble for doing so.

When Responding to a Disclosure, Staff Should:

- **Remain calm** and listen carefully, allowing the child to speak freely without interruption.
- **Avoid leading questions**—use open prompts like *"What happened?"*, *"When did it happen?"*, *"Who was involved?"*
- **Never promise confidentiality—**explain that information may need to be shared to keep them safe.
- **Reassure the child** that they are being taken seriously and will be supported.
- **Make a clear, factual record** using CPOMS (or report immediately to the DSL/Deputy if CPOMS is not accessible). Notes must reflect only what the child has said, not staff opinion.

When to Inform Parents:

- The **DSL will normally speak to parents/carers** unless doing so would increase the risk to the child.
- **Contact with parents must follow advice from the CPAL consultation line** (Children's Social Care).
- Staff other than the DSL should not contact parents without permission.

- Where there is an allegation of abuse by another pupil, the parents/carers of **all parties involved will usually be informed**, again following advice from CPAL.

Support for Staff:

If a member of staff feels distressed after managing a disclosure, they should seek support from their **line manager, HR Manager or DSL.**

19. Confidentiality and Information Sharing (including consent)

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

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

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

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

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

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

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

The School recognises the importance of obtaining consent when sharing personal information. Wherever possible and appropriate, consent will be sought from the parent, carer or child (depending on age and understanding) before sharing safeguarding information with external agencies.

However, consent is **not required** if:

- Gaining consent would **place a child at increased risk of harm**, such as in cases of abuse or neglect;
- It is not **possible to gain consent**, for example, if the parent or child cannot be contacted in a timely way;
- Sharing information is justified in the child's best interests and necessary to **safeguard their welfare**.
- There is a **legal obligation** or statutory requirement to share information, such as under Section 47 or Section 17 of the Children Act 1989.

In such cases, information will still be shared in a proportionate and timely way, following the **seven golden rules** of information sharing outlined in government guidance.

Where confidentiality or anonymity has been breached, the School will implement appropriate disciplinary procedures and review internal systems to minimise future risk and mitigate any harm caused.

When a pupil transfers to another setting, the DSL will ensure the **Child Protection file is transferred securely** and will also consider whether any **additional safeguarding or wellbeing information** should be shared with the new setting to support a smooth and safe transition.

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.

20. Referring to Children's Social Care

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

LBTH Multi-Agency Support Team:

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

Child Protection Advice Line:

020 7364 3444

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

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

21. Escalation Procedures

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

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

Appendices

This policy is issued alongside the following appendices, updated by the LBTH Safeguarding Children Partnership each September and attached separately:

- Appendix 1: MAST (Multi-Agency Support Team) poster and contact information (September 2026)
- Appendix 2: LADO (Local Authority Designated Officer) contact poster (September 2026)
- Appendix 3: MAST Request for Support Form (MAST Request for Support Form)
- Appendix 4: Halley's flow chart for reporting concerns
- Appendix 5: Glossary of terms
- Appendix 6: Safer Recruitment & DBS
- Appendix 7: Managing Allegations Against Staff
- Appendix 8: Key policies and Linked Documents
- Appendix 9: Staff declaration & policy confirmation
- Appendix 10: Early Help pathway & TAF guidance

For the detailed guidance referenced throughout this policy – covering vulnerable groups and specific safeguarding risks – see **Halley Safeguarding Practice Guidance 2026–27**.

Appendix 8: Key policies and linked documents

This policy should be read alongside:

- Halley Safeguarding Practice Guidance 2026–27
- Staff Code of Conduct / Safer Care and Professional Code of Conduct
- Staff Handbook
- Whistleblowing Policy
- Behaviour and Relationships Policy (including Anti-Bullying and Child-on-Child Abuse provisions)
- Anti Bullying Policy
- Online Safety Policy and Acceptable Use Policies (staff and pupils)
- Attendance Policy
- Equality Statement
- SEND Policy
- Trips and Visits Policy
- Relationships and Sex Education (RSE) Policy