

Safeguarding and Child Protection Policy

2020-2021

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1 Introduction

MPW is committed to safeguarding and promoting the welfare and wellbeing of young people and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The college recognises that children and young people learn best when they are healthy, safe and secure

This policy has been authorised by the MPW Board, is addressed to all members of staff and volunteers, is available to parents and prospective parents on request and is published on the college website. (*Note: in this policy, “parent” covers “parent and guardian”.*) This policy has regard to statutory guidance *Keeping children safe in education* (September 2020), *Working together to safeguard children* (September 2018) and *Prevent Duty Guidance for England and Wales July 2015* and is in accordance with the Bi-Borough’s and Tri-Borough’s locally agreed inter-agency procedures. Multi-agency arrangements for safeguarding children are now handled by the three Safeguarding Partner agencies:

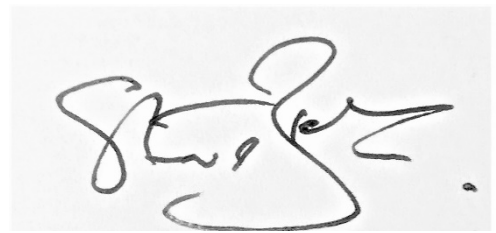
- the local authority (Tri-Borough which includes Royal Borough of Kensington and Chelsea, Hammersmith and Fulham and Westminster)
- clinical commissioning group
- the police

The Safeguarding Partners have come together to form the Local Safeguarding Partnership (LSP), replacing the Local Safeguarding Children’s Board (LSCB).

This policy can be made available in large print or other accessible formats if required. It applies wherever staff members are working with students – even where this is away from the college; for example, at an activity centre or on an educational visit.



John Southworth
Principal



Steve Boyes
Chairman of the Board

2 Aims

MPW aims to provide an educational environment in which safeguarding and promoting the welfare of students in our care is of paramount importance and a responsibility for all staff. To achieve this, the college operates a child-centred and coordinated response as it seeks to:

- a. prevent threats to student welfare by creating a safe college environment and a strong pastoral system; and
- b. protect students in our care by ensuring staff are appropriately recruited, trained and supported to respond appropriately to child protection concerns and by following agreed procedures.

To fulfil these aims, the college will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff (including members of the MPW Board, volunteers and staff employed by other organisations) to work with young people, in accordance with the guidance given in *Keeping children safe in education* (2020) and the *Education*

(Independent School Standards) Regulations (2014). See also the college's separate Recruitment, Selection and Disclosure Policy;

- ensure that, where members of staff from other organisations are working with our students on another site, we have received assurances that appropriate child protection checks and procedures apply to those members of staff;
- follow the local inter-agency procedures of the Tri-Borough Local Safeguarding Partnership and contributing to inter-agency working;
- protect each student from any form of abuse, whether from an adult or another student (see also the college's Anti-Bullying and Cyber-Bullying Policies);
- be alert to signs of abuse, both in the college and from outside;
- deal appropriately with every suspicion or complaint of abuse;
- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified (see also the college's Prevention of Radicalisation and Extremism Policy);
- design and operate procedures which promote this policy;
- design and operate procedures which, so far as possible, ensure that tutors and others who are innocent are not prejudiced by false allegations;
- support students in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach;
- support students who have been abused in accordance with their agreed child protection plan;
- be alert to the needs of students with medical and mental health conditions (see also the college's First Aid Policy and Mental Health and Wellbeing Policy);
- operate robust and sensible health and safety procedures;
- teach students about safeguarding, for example through use of online resources, through the curriculum and PSHE, together with guidance on adjusting behaviour to reduce risks including the safe use of electronic devices and the internet (see also the college's E-Safety Policy);
- take all practicable steps to ensure that college premises are as secure as circumstances permit;
- operate clear and supportive policies on drugs, alcohol and substance misuse; and
- ensure that any deficiencies or weaknesses in our child protection and safeguarding procedures are remedied without delay.

[Keeping children safe in education \(2020\)](#) defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

[The Prevent Duty Guidance for England and Wales \(2015\)](#) emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

Every complaint or suspicion of abuse from within or outside the college will be taken seriously and action will be taken in accordance with this policy.

3 MPW's Designated Safeguarding Team

The Designated Safeguarding Lead (DSL) at MPW is Petrouchka Stafford (Vice Principal and member of the Senior Leadership Team). If the DSL is unavailable, the role will be carried out by the Deputy DSLs Egle Plioplyte, Imogen Riddick and Jessie Venegas, all of whom are members of the Director of Studies team. The DSL or Deputy DSLs are always available during college hours to discuss safeguarding concerns with staff, either in person or via telephone or email. The relevant contact details are as follows:

Petrouchka Stafford	020 7835 1355	petrouchka.stafford@mpw.ac.uk
Egle Plioplyte	020 7835 1355	egle.plioplyte@mpw.ac.uk
Imogen Riddick	020 7835 1355	imogen.riddick@mpw.ac.uk
Jessie Venegas	020 7835 1355	jessie.venegas@mpw.ac.uk

Should the DSL and Deputy DSLs be absent, the role will be carried out by the Principal. Outside of college hours and during out of term activities, a designated member of the SLT will assume temporary responsibility.

Petrouchka Stafford is the designated member of safeguarding team who has specific responsibility for the oversight of the progress and welfare of looked after children in the event that any are placed at the college by the local authority.

The DSL and Deputy DSLs shall be given the time, funding, training, resources and support to enable them to support other staff on safeguarding matters, to contribute to strategy discussions and/or inter-agency meetings and to contribute to the assessment of students.

While all members of staff have a duty to safeguard students and vulnerable young people, as well as to promote their welfare, any child protection concerns should be communicated to the DSL or another member of the DSL team, who are the first point of contact for parents, students, teaching and non-teaching staff and any other relevant people, unless the allegation concerns a member of staff or volunteer in which case the procedures in the section *Allegations Against Members of Staff, including Supply Teachers, Volunteers and Contractors* below should be followed.

Parents can report to the DSL on the welfare of any student in the college, whether these concerns relate to their own child or any other child. If preferred, parents may discuss concerns in private with the student's tutor or other member of staff, who will notify the DSL in accordance with these procedures.

A full list of the responsibilities of the DSL based on Annex B of *Keeping children safe in education* is provided in Appendix C of this document. In summary they are to:

- be a first or early point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters of child protection and to provide support, advice and expertise on all matters concerning safeguarding;
- co-ordinate MPW London's child protection procedures and to review and update regularly the procedures and implementation of the procedures, working with the MPW Board as necessary;
- encourage a culture of listening to young people and taking into account their wishes and feelings, among all staff, in any measures the college may put in place to keep them safe;
- ensure that all members of staff and volunteers receive the appropriate training on child protection, to keep and maintain records of this training and to ensure that staff are aware of training opportunities and the latest local policies on safeguarding;

- keep detailed, accurate, secure written records of concerns or referrals;
- monitor the confidentiality and storage of records relating to child protection and where a student leaves, ensure his/her child protection file is copied for the new school as soon as possible and transfer it separately from the main student file, ensuring secure transit and confirmation of receipt will be obtained;
- monitor the operation of this policy;
- liaise promptly with other agencies, including children's social care and the Local Authority Designated Officer (LADO), the police (if a criminal matter) and the Disclosure and Barring Service, on behalf of the college;
- monitor records of students in the college who are subject to a child protection plan, to ensure that this is maintained and updated as notification is received;
- promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that students, including those with a social worker, are experiencing, or have experienced, with tutors and members of the college's senior leadership team.
- ensure that staff inviting visiting speakers to the college have completed the risk assessment form for them. (The risk assessment form can be found in the appendix to the college's Visiting Speaker Policy.)
- where appropriate, take part in child protection conferences or reviews; and
- advise and act promptly upon suspicion, belief or evidence of abuse reported to them, and keep the Principal informed of all actions, unless the Principal is the subject of a complaint.

The DSL and Deputy DSLs regularly update their professional knowledge and skills by engaging with developments in safeguarding throughout the academic year; and they undergo formal training at two-yearly intervals in line with Local Authority guidance. This training is provided by an approved agency and covers child protection, inter-agency working in locally agreed procedures, participation in child protection conferences, supporting children in need, identifying children at risk of radicalisation, record-keeping and promoting a culture of listening to children. Additional specialist training will be obtained for those who have specific responsibility for Looked After Children.

4 Staff training

Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse is concerned. All members of staff, including the Principal, and any volunteers involved in 'regulated activity' have child protection training which is updated regularly (at least annually) in accordance with Tri-Borough Local Safeguarding Partnership guidance and procedures. This will include training on how to manage a report of peer-on-peer sexual violence and sexual harassment. Such training is arranged by the DSL, and delivered through a combination of INSET, e-bulletin updates, and the completion of relevant e-courses.

All new members of staff, including temporary employees or volunteers, receive formal child protection training as part of the induction process that includes:

- this policy and related safeguarding policies on Anti-Bullying and Cyber-bullying, E-Safety, Mental Health, and Prevent;
- the role, identity and contact details of the DSL and Deputy DSLs;
- a copy of Part One of *Keeping children safe in education (2020)*, including *Annex A: Further Information*, which is appended to this policy (see Appendix D);
- the staff Code of Conduct;
- Promoting Good Student Behaviour Policy;

- Children Missing from Education Policy; and
- the Whistleblowing Policy;

All staff receive updated copies of the above documentation and are required to confirm that they have read and understood it. Staff training incorporates opportunities for checking and consolidating their understanding. Staff can also access all safeguarding policies and further reading in the staff section of the college's VLE.

Staff development training includes a particular focus on mental health and online safety; additionally, the college continually assesses the appropriate level and focus for staff training in specific safeguarding concerns such as radicalisation, child sexual exploitation, and female genital mutilation.

The nominated Board member for child protection (see below) will receive appropriate training to enable them to fulfil their safeguarding responsibilities.

5 Duty of staff, board members and volunteers

Every employee and Board member of the college as well as every volunteer who assists the college is under a general legal duty to:

- consider at all times the best interests of the student and take action to enable all students to have the best outcomes;
- be aware of the indicators of the different forms of abuse and neglect and of emergent mental health issues;
- protect students from abuse, neglect, radicalisation and extremism;
- be aware of all the college's safeguarding policies and child protection procedures and follow them;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event; and
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and
- support social services and any other agencies following any referral.

The MPW Board of Governors ensures that the college's safeguarding arrangements take into account the procedures and practice of the Tri-Borough Local Safeguarding Partnership. The Chairman of the Board is Steve Boyes and he is also the nominated Board member for safeguarding. He instigates a review of the college's safeguarding procedures on behalf of the Board and reports to the Board annually, making recommendations for improvements. The nominated Board member also discusses safeguarding matters with the Designated Safeguarding Lead at least on a termly basis and will, where appropriate, liaise directly with the local authority and/or partner agencies.

6 Early Help and young people who may be vulnerable

MPW recognises that young people face many challenges during their adolescence that put them in need of support. These include: stress, peer pressure, body image concerns, mental health and relationship issues. Through a co-ordinated and child-centred approach, the college has various safeguarding mechanisms for identifying, monitoring and addressing these concerns at an early stage to prevent them from escalating into more serious problems. These include: a thorough student recruitment process, the Director of Studies pastoral system, the college counsellor, the PSHE programme and various policies including the *SMSC* (Spiritual, Moral, Social and Cultural Development) Policy, the Mental Health and Wellbeing Policy and the Prevent Policy. Staff and students are encouraged to raise concerns that they have as soon as they are identified, either to the

student's Director of Studies or directly to the Designated Safeguarding Lead, so that effective early intervention can be put in place.

The college recognises the increased vulnerability of young people who:

- are disabled or have special educational needs;
- do not have English as a first language;
- are living away from home for the first time;
- are young carers;
- are faced with challenging family circumstances;
- are looked-after children; or
- may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

These reasons for this increased vulnerability are varied. They can include:

- assumptions that indicators of possible such as behaviour, mood or injury relate to a student's disability without further exploration;
- students with special educational needs or disabilities being disproportionately impacted by bullying; and
- communication barriers and difficulties overcoming these barriers.

Where it is evident that a young person is in immediate danger or at risk of significant harm, the college operates robust referral procedures to ensure that they receive the necessary support from the relevant authorities. Immediate danger or risk of significant harm can come in the form of self-inflicted harm, such as self-harming and eating disorders, or in the form of child abuse, including radicalisation. The college's Mental Health and Wellbeing Policy outlines further information regarding types of mental health problems affecting young people, including self-harm, and how staff should respond to these safeguarding concerns and it is required reading for all members of staff. What follows below is with regards to safeguarding against child abuse.

7 What is child abuse?

Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (eg via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (peer-on-peer abuse). Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

8 Forms of child abuse

There are four categories of child abuse which are commonly identified:

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

- **Sexual:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Other forms of abuse:

- **Child sexual exploitation (CSE):** CSE occurs where an individual or group takes advantage of an imbalance of power* to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants (for example, food, drugs, alcohol money or affection) 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity 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).
- **Child criminal exploitation (CCE):** CCE 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 being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten young people.

** An imbalance of power is commonly associated with age difference, it can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic and other resources.*

- **County lines:** 'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of 'deal line'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) 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, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), where the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

- **Children Missing from Education:** all children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child going missing from education is a potential indicator of abuse or neglect, including possible sexual abuse, sexual exploitation or radicalization. The school will report to the Local Authority instances of prolonged unauthorised absence, students who go missing on repeat occasions, or a student being removed from the college roll under the circumstances outlined in KCSIE. For further details, refer to paragraph 27 of this document (Students missing from education procedures).
- **Domestic Abuse:** The cross-government definition of domestic abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial and emotional. 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. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- **Honour-Based Abuse (HBA):** So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed supposedly to protect or defend the honour of the family and/or community, including FGM (see below), 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 HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.
- **Female Genital Mutilation (FGM):** FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. All staff must be aware of the mandatory requirement for teachers to inform 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 aged under 18. The duty to report resides with the teacher who becomes aware of the case not the DSL, although the DSL should be informed. The report should be made orally by calling 101 within 24 hours of the issue coming to light.
- **Forced Marriage:** A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for

example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

- **Upskirting:** Typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or to cause humiliation or distress is now a criminal offence. Anyone of any gender can be a victim.
- **Radicalisation and Extremism:** 'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 'Extremism' is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Extremist views may result in terrorist activity which is where is an action or actions endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts electronic systems. The use of threat of terrorist activity must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to hide their views. College staff should use their professional judgement in identifying young people who might be at risk of radicalisation and act proportionately. For further details, see the college's Prevent Policy.

For further details on all of the above categories of abuse, see Appendices B and D. Appendix B contains further information on signs of abuse. Appendix D contains part one of *Keeping children safe in education* (2020).

Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between young people outside these environments. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and young people may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Some indications of possible abuse

Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):

- The student discloses that he or she has been abused, or asks a question which gives rise to that inference
- A student's injury cannot be reasonably or consistently explained, or is unusual in type or location
- A pattern or frequency of injuries is emerging
- The student engages in extreme or challenging behaviour
- The student asks to drop subjects with a particular tutor and seems reluctant to discuss reasons
- The student appears neglected (eg dirty, hungry, inadequately clothed)
- The student appears reluctant to return home or has been openly rejected by parents or guardians
- The student's development is delayed in terms of emotional progress
- Emotional withdrawal – showing a lack of trust in adults

- The student shies away from being touched or flinches at sudden movements
- Unaccountable mood swings
- Exhibiting symptoms of mental health problems
- The student loses or gains weight

Further guidance is provided in Appendix B. Other sources of information on the signs of abuse include: The Tri-Borough Safeguarding Partnership; the DfE advice note [What to do if you're worried a child is being abused](#) (2015); and the [NSPCC](#) website.

9 Listening to students

The college provides a range of opportunities for students to be listened to. Students can speak with subject tutors, Directors of Studies, a member of the DSL team or make use of the college counselling service. Concerns can also be brought to our attention via the student council or via the confidential suggestions and worries box which is located outside the DSL's office (91.G2) Contact details for external agencies such as Childline and Office of the Children's Commissioner are available in common room areas and the libraries.

10 Procedure to be followed by a member of staff if abuse is suspected or reported

A member of staff suspecting or hearing a complaint of abuse must:

- listen carefully to the student and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place;
- not ask leading questions: that is, a question which suggests its own answer (doing so may prejudice an investigation). Open questions – where, when, what etc - may be used as prompts but students should not be pressed to reveal additional information if they reticent to do so.
- not make any attempt to investigate the incident themselves;
- reassure the student but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information in accordance with this policy to ensure that the correct action is taken. Staff should only share a report with those people who are necessary to progress it; and
- keep a sufficient written record of the conversation. The record should be a factual one and include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should not reflect any personal opinions on the information being provided. The record should be signed by the person making it and signed using names, not initials. The record of all other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on when reporting the matter.
- where a report includes an online element, staff should, where possible, avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically. Further guidance is available on what to do if viewing an image is unavoidable on:
 - <https://www.gov.uk/government/publications/searching-screening-and-confiscation>
 - <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

All suspicions or complaints of abuse must be reported to the DSL as soon as possible, unless they constitute an allegation against a member of staff in which case the procedures set out in the section *Allegations Against Members of Staff (including supply staff), Volunteers or contractors* below should be followed.

All tutors have a statutory duty to report to the police where they discover that FGM appears to have been carried out on a girl under 18; unless the tutor has a good reason not to, they should also still refer any such case

to the DSL. This statutory duty does not apply to at risk or suspected cases, which should be addressed in accordance with normal referral procedures in the preceding paragraph (see *Annex A: Further Information* in Appendix D). Normal referral procedures must also be used when there are concerns about children who may be at risk of being drawn into terrorism (see the college's Prevent Policy).

11 Duties of the Designated Safeguarding Lead on receiving information about possible abuse

If a suspicion or complaint of abuse is made, the DSL must decide upon the action to be taken, bearing in mind:

- the inter-agency procedures of the Tri-Borough Local Safeguarding Partnership;
- where relevant, local information sharing protocols relating to Channel referrals;
- the nature and seriousness of the complaint;
- that, if the complaint involves serious harm, the police and/or children's social care should always be contacted from the outset (Further guidance on when to call the police is provided by the NPCC: [NPCC - When to call the police](#));
- the best interests of the student;
- the student's wishes or feelings; and
- issues of confidentiality, so far as applicable.

12 Making referrals

Responsibility for referral decisions rests with DSL or one of her deputies. The decision-making process will be in line with local referral thresholds published by the Local Safeguarding Partnership. The referral procedures to be followed are determined by the nature of the disclosure being made. The key determinant as to which procedure is to be followed is whether the child is considered to be:

- in need; or
- at risk of suffering harm.

In circumstances where a student has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the DSL will, when the concern is identified, immediately liaise with the children's social services department where the child lives. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should an inter-agency early help assessment and procedures will be put in place by children's services to arrange this. The college will coordinate with the local inter-agencies involved as part of the Common Assessment Framework and the Team around the Child approach.

If there is room for doubt as to whether a referral should be made, the DSL will consult with children's social care on a no-names basis without identifying the family. However, as soon as sufficient concern exists that a student may be at risk of harm or in immediate danger, a referral to children's social care and/or the police will be made immediately. If the referral is made by a member of staff other than the DSL, the DSL should be informed as soon as possible that a referral has been made. The college is not required to obtain parental consent prior to a referral being made to statutory agencies.

If the initial referral is made by telephone, the DSL should confirm the referral in writing within 24 hours. If no response has been received within three working days, the DSL must contact children's social care again.

Where relevant, the college will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable

to being drawn into terrorism. The college will respond to requests for information from the police promptly and in any event within five to ten working days (see the college's Prevent Policy).

Any member of staff may refer a matter to children's social care directly; this could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

13 External agencies

When the college decides to refer a particular complaint of abuse to social services or the police, the parents and student will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.

14 Contact details for agency involvement

We follow the procedures of the Tri-Borough Local Safeguarding Partnership; this is in accordance with the London Child Protection procedures, found at <http://www.londoncp.co.uk>. We are advised by Hilary Shaw (Bi-borough Senior Inclusion Officer) and Di Donaldson (Tri-Borough Safeguarding and Child Protection in Schools and Education Officer), who the DSL regularly consults on safeguarding matters:

- Hilary Shaw, Senior Lead Adviser (School Inclusion) | 07817 365 519 | hilary.shaw@rbkc.gov.uk
- Di Donaldson, Safeguarding in Schools & Education Settings Lead, WCC and RBKC | 07890 397061 | di.donaldson@rbkc.gov.uk

The contact details for the Tri-Borough Authority Designated Officer (LADO) are:

- Sharon Ackbersingh, LADO (Local Authority Designated Officer) | 07714 845702 | sharon.ackbersingh@rbkc.gov.uk

Further contact details are listed in Appendix A.

15 Allegations against members of staff (including supply staff, contractors and volunteers)

An appropriate balance should be struck between the safety and wellbeing of any student who is the subject of concern and the need to protect staff and volunteers from false, malicious and unfounded allegations. The college has such procedures for dealing with allegations against staff and volunteers which follow Part Four of *Keeping children safe in education (September 2020)*.

The following procedures will be used where the member of staff or volunteer 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 student or students in a way that indicated he or she would pose a risk of harm if they work regularly or closely with children; or
- behaved or may have behaved in a way (in or outside of college) that indicates they might not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (eg domestic violence at home).

Reporting an allegation against staff (including the DSL) or volunteers

Where an allegation or complaint is made against a member of staff (including supply staff), contractor, volunteer or the DSL, the matter should be reported immediately to the Principal, John Southworth (john.southworth@mpw.ac.uk), or in his absence to Steve Boyes (steve.boyes@mpw.ac.uk), who is the

Chairman of the MPW Board. The adult to whom the allegation relates should not be informed without the explicit consent of the LADO.

In the event that an allegation relates to the Principal, the person receiving the allegation must refer it immediately to the Chairman of the Board, Steve Boyes, or in his absence to the Chief Executive Officer, Spencer Coles (spencer.coles@mpw.ac.uk), without first notifying the Principal.

If an allegation is made against a member of the Board, the allegation should be reported to the Chairman. If either the Chairman is the subject of an allegation, the matter should be reported to the Chief Executive Officer.

The Principal, Chairman or Chief Executive Officer, as appropriate, may consult with the DSL and will immediately consult with the Local Authority Designated Officer before further action is taken.

If it is not possible to report to the Principal, Chairman or Chief Executive Officer in the circumstances set out above, a report should be made immediately to the DSL or, if unavailable or if the complaint concerns the DSL, to the Deputy DSLs. The DSL or Deputy DSLs, as appropriate, will take action in accordance with these procedures and will as soon as possible inform the Principal or, where appropriate, the Chairman of the Board.

The person taking action in accordance with these procedures is known as the 'case manager'.

Actions to be taken by the case manager

If the case manager is unsure whether the allegation meets the criteria above, the Local Authority Designated Officer (LADO) will be consulted for advice. Any allegations meeting the criteria will be dealt with in accordance with the Local Safeguarding Children Partnership's procedures. All such allegations must be dealt with as a priority so as to avoid any delay.

The case manager will immediately (and in any event within one working day) discuss the matter with the LADO – the person designated by the local authority to be involved in the management of allegations against people who work with children – before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to investigate the allegation until the LADO is consulted, so as not to jeopardise statutory investigations. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.

In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.

Allegations against a tutor who is no longer teaching and historical allegations will be referred to the police.

Disclosure of information

The case manager will inform the accused person of the allegation as soon as possible after the Local Authority Designated Officer has been consulted.

The parents of the student involved will be informed as soon as possible if they do not already know of the allegation and will be kept informed of the progress of the case, including the outcome of any disciplinary process. Where other agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. The timing and extent of disclosures, and the terms on

which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

The reporting restrictions preventing the identification of a tutor who is the subject of such an allegation in certain circumstances will be observed.

Investigation

Allegations about safeguarding are usually conducted by external agencies such as social services or the police rather than by the college. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should be conducted.

Where an external agency is conducting the investigation rather than the college, the college will cooperate fully with external investigators. No internal investigation into possible breaches of the college's disciplinary code will commence until any external investigation or criminal proceedings are complete.

It is recognised that the college may have to consider an allegation against an individual not directly employed by the college; for example, supply tutors provided by an employment agency or business. MPW will ensure allegations are dealt with properly. Prior to ceasing using a supply tutor due to safeguarding concerns, the facts will be found out and the LADO liaised with to determine a suitable outcome. The college may discuss with the agency whether it is appropriate to suspend the supply tutor, or redeploy them, whilst the investigation is carried out. MPW may take the lead in the investigation as required in full co-operation with the LADO, police and/or children's social services. The supply tutor will be advised to contact their trade union for representation. If there is an allegation meeting it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the college.

In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Support

The college has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available.

Support will also be offered to the student(s) affected and their parents or guardian. The college will consult with the children's social services, or the police as appropriate, as to how this can be done in the most appropriate and effective way.

Suspension

Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a student or other students at the college is or are at risk of significant harm or the allegation is so serious that it might be grounds for dismissal. The college will consider whether the result that would be

achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The college will balance the need to ensure the safety and welfare of the student with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.

If suspension is deemed appropriate, the reasons and justification will be recorded by the college and the individual notified of the reasons for the suspension. The college will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.

If it is decided that the person who has been suspended should return to work, the college will consider how to facilitate this; for example, whether a phased return would be appropriate. The college may provide a mentor and will also consider how to manage contact with the student who made the allegation

Confidentiality

The college will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.

A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.

The case manager will take advice from the LADO, police and children's services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make the parents or guardian of the student involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises.

Unsubstantiated or malicious allegations

Where an allegation by a student is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the college's Policy for Promoting Good Behaviour.

Where a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the college, on the basis that they have treated the college or a member of staff unreasonably.

Whether or not the person making the allegation is a student or a parent (or other member of the public), the college reserves the right to contact the police to determine whether any action might be appropriate.

Records

Details of allegations that are found to be malicious will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).

When providing employer references, MPW will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious

Ceasing to use staff

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; or resignation. If the college ceases to use the services of a member of staff, contractor or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service (DBS) will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the college, with a report being presented to the Board without delay.

If a member of staff, contractor or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the college in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the prescribed criteria are met.

Where a tutor has been dismissed, or would have been dismissed had he/she not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Authority (TRA) should be made, as per the advice set out in the TRA document [Teacher misconduct: information for teachers](#) (April 2018) appears in the guidance published by the TRA. The reasons for the TRA to consider whether a prohibition order might be appropriate are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. The college will follow the advice set out in the TRA guidance, [Teacher misconduct – the prohibition of teachers](#) (as updated from time to time) to make a judgment about whether a referral should be made. If in doubt, a referral will be made.

16 Arrangements for dealing with peer-on-peer abuse and allegations

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but is not limited to, bullying (including cyberbullying), sexual violence and sexual harassment; upskirting; physical abuse such as hitting, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type of violence and rituals.

Peer-on-peer abuse tends to be more prevalent amongst boys than girls and often manifests itself differently. For example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, students with SEND and LGBT students are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act. Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment can take a wide variety of forms:

- Sexual comments (eg making lewd comments or sexualized remarks about a person's clothes or appearance, using sexualised names etc);
- Physical behaviours (eg deliberately brushing against someone, interfering with clothing, upskirting, displaying pictures, drawings or photos of a sexual nature); and

- Online harassment (eg non-consensual sharing of images and videos, unwanted sexualised comments and messages)

MPW has an important role in developing students' understanding of what constitutes peer-on-peer abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, staff should be aware of the importance of:

- 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”, “just having a laugh” or “boys being boys”; and
- robustly challenging behaviours such as grabbing bottoms, breasts, genitalia, flicking bras and lifting up skirts

Other strategies in place to prevent the occurrence of peer-on-peer abuse include:

- providing developmentally appropriate PSHE lessons which develop students' understanding of acceptable behaviour and keeping themselves safe;
- having systems in place to for any students to raise concerns with staff, knowing that they will be listened to, believed and valued; and
- delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable

All staff will be trained to manage a report of peer-on-peer sexual violence and sexual harassment. Allegations against students of peer-on-peer abuse will be reported in accordance with the procedures set out in this policy if the relevant threshold criteria have been met (ie where there is reasonable cause to suspect a student is suffering or is likely to suffer significant harm). A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the college's policies on behaviour and discipline will apply. The college will seek the advice of children's social care on the investigation of any allegation and will take all appropriate action on the safety and welfare of all students concerned including that of the student accused of abuse. If it proves necessary that a student(s) needs to be interviewed by the police with regard to allegations of abuse, the college will ensure that, depending on the advice of children's social care, the parents are informed as soon as possible and that an appropriate adult supports the student during the interview. In the case of students whose parents are abroad, the student's education guardian will be asked to support the student and to accommodate him or her if it is necessary to suspend him or her during the investigation.

Where peer-on-peer abuse occurs both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at the college) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other students; and any relevant contextual factors. Children's social services will independently risk assess the situation and any report produced by them will be used to inform and update the college's own risk assessment which, in any event, will be reviewed on a regular basis. For further details of how cases of peer-on-peer abuse will be managed refer to Part 5 of KCSIE (September 2020).

Further details about the college's anti-bullying strategy and contained within its Anti-bullying and Cyber-bullying Policies.

17 Mental health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these young people's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a student, immediate action should be taken by raising the issue with the DSL, who may in turn contact an appropriate external agency. Further details are provided in the college's Mental Well-Being Policy.

18 Whistleblowing

Staff and volunteers should also feel able to follow the college's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the college, potential failures by the college or its staff to properly safeguard the welfare of students, or other wrongdoing in the workplace that does not involve the safeguarding and welfare of students.

19 Safer recruitment

All prospective members of staff undergo DBS checks and will also be subject to the other checks required under the [Education \(Independent School Standards\) Regulations \(2014\)](#) and in accordance with Keeping children safe in education (2020). At least one member of any MPW staff recruitment panel will have had Safer Recruitment training. Please also see the college's separate Recruitment, Selection and Disclosure Policy.

20 Guidance to staff

Members of staff should be circumspect about placing themselves in positions which may give rise to allegations of abuse or in which they may suffer abuse, such as verbal bullying or cyber-bullying. For instance, they should be wary of disclosing personal details to students, of placing themselves in positions in relation to students which could be misconstrued and of engaging in conduct which could place themselves or their students at risk of harm (eg, giving a student a lift in a car, using innuendo or giving gifts). A written Code of Conduct, which contains detailed guidance on acceptable behaviour and actions, is issued to all new employees on appointment and is reissued annually to all staff.

21 Teaching students to keep themselves safe

The college is committed to raising awareness of personal safety whenever the opportunity arises. This includes highlighting general health and safety matters in and around the college as well as in the wider world and educating students about specific safeguarding issues such as staying safe online (including when they are accessing remote learning), radicalisation, grooming, child sexual exploitation, child criminal exploitation, healthy relationships, mental health, substance misuse, bullying and sexting. These issues are explored in a variety of contexts, including academic and PSHE lessons, general studies seminars, and in individual pastoral meetings with Directors of Studies. A range of written and online resources are also provided to students when they join the college (Student Handbook, Acceptable use of IT Policy and a booklet on mental health and wellbeing) and these are also available on the VLE. Students are specifically taught how to identify risks and how to modify

behaviour to mitigate these risks. The college also has a range of filtering systems in place to keep students safe when accessing internet whilst at the college and usage is also monitored (see the college's E-safety Policy for further details). Staff are also aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation.

22 Students missing from education procedures

All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any student missing from college. The procedure includes the requirement to record any incident, the action taken and the reasons given by the student for being missing. Please see the college's separate Missing Student Policy for further details.

All staff should be aware that children going missing, particularly repeatedly, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The college has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the local authority students who are missing from college for more than 10 school days (continuous). The procedure includes notifying a member of the DSL Team and the requirement to record any incident, the action taken and the reasons given by the student for being missing.

The college has a legal duty to inform the Local Authority if a student is to be removed from the roll at a non-standard transition point; ie, where a compulsory school-aged child leaves the college before completing the college's final year. This notification will be made at the point the student's name is taken off the roll. When this notification is made the college is required to provide the following information: full name of the student; name, address and telephone number of the parent the student lives with; details of any new address for the child and parent; the name of the student's destination school and expected start date; and the reason why the student is leaving the college.

The college is also legally required to notify the Local Authority within five days of adding a student's name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new student; specifically, their full name; sex; name and address known to be a parent of the student (and an indication of which parent he student normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone numbers at which the parent can be contacted in an emergency*; date of birth; name and address of last school attended (if any); and details of whether they are a boarder or a day student. The information must be forwarded to the Tri-Borough's Education Welfare Service

This information is also logged and a record is kept by the DSL.

**Note: In line with KCSIE 2020, it is the college's policy to hold a minimum of two emergency contact numbers for each student.*

23 Informing parents

Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer, children's social care, the police and/or the Principal before discussing details with parents. Where there are reasonable grounds to believe that a child is at risk of significant harm a referral can be made without parental consent.

In relation to Channel referrals, the Designated Safeguarding Lead will consider seeking the consent of the student (or their parent/guardian) when determining what information can be shared. Whether or not consent is

sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

24 Secure college premises

MPW will take all practicable steps to ensure that college premises are as secure as circumstances permit. An electronic Visitors' Book is kept at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on college premises by a member of staff. All visitors will be given a name badge with the title "Visitor", which must be clearly displayed and worn at all times whilst on the college premises. CCTV operates at the entrance of the college, as well as common areas and in the student common room.

25 Confidentiality and information sharing

The college will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The college will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under [section 47 of the Children Act 1989](#) in accordance with the requirements [of Working Together to Safeguard Children \(July 2018\)](#), the [Prevent Duty Guidance for England and Wales \(2015\)](#) and [Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism \(2015\)](#).

Where a student who is subject to a child protection plan is moving to another school, the DSL will ensure their child protection file is securely transferred to the new school as soon as possible. This file will be transferred separately from the main student file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL will also consider if it would be appropriate to share any information with a new school in advance of a student leaving. For example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the child arrives.

Where allegations have been made against staff, the college will consult with the Local Authority Designated Officer and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. 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. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance [Information Sharing](#) was published by the Government in July 2018.

26 Monitoring

Any child protection incidents at the college will be followed by a review of the safeguarding procedures in the college and a report to the MPW Board. Where an incident involves a member of staff, the Local Authority Designated Officer will be asked to assist in this review to determine whether any improvements can be made to the college's procedures. The DSL will monitor the operation of this policy and the college's procedures and present an annual report to the MPW Board.

The MPW Board will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The Board will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.

Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

27 Other Relevant Policies

The following policies should be read in conjunction with this policy:

- Anti-Bullying Policy
- Health and Safety Policy
- Educational Visits Policy
- Recruitment, Selection and Disclosure Policy
- Code of Conduct for Staff
- Policy for Promoting Good Behaviour
- Cyber-bullying Policy
- E-Safety Policy
- ICT acceptable Use Policy
- Whistleblowing Policy
- Missing Student Policy
- Mental Health and Wellbeing Policy
- Prevent Duty Policy
- Remote Learning Policy
- RSE Policy

Appendix A: SAFEGUARDING AND CHILD PROTECTION CONTACTS FOR SCHOOLS

Leadership Team	<p>Sarah Newman, Executive Director of Children’s Services 07966 183 716 snewman@westminster.gov.uk</p> <p>Ian Heggs, Director of Education 020 7361 2941 ian.heggs@rbkc.gov.uk</p>
School Standards	<p>Hilary Shaw, Senior Lead Adviser (School Inclusion) 07817 365 519 hilary.shaw@rbkc.gov.uk</p> <p>Clare Sumpter, CPD Co-ordinator 07973 124014 clare.sumpter@rbkc.gov.uk</p>
Virtual Schools for Looked After Children	<p>Eghele Eyituyo, Head of RBKC Virtual School (Secondment) Eghele.Eyituyo@rbkc.gov.uk</p>
Family Services	<p>Glen Peache, RBKC Director of Family Services 020 7361 2089 glen.peache@rbkc.gov.uk</p>
Safeguarding Review & Quality Assurance	<p>Angela Flahive, Head of Safeguarding, Review & Quality Assurance (RBKC and WCC) 07739 315 970 020 7361 3467 angela.flahive@rbkc.gov.uk</p> <p>Di Donaldson, Safeguarding in Schools & Education Settings Lead, WCC & RBKC 07890 397061 di.donaldson@rbkc.gov.uk secondment until 1/11/20</p> <p>Kembra Healy, Srqa Manager Quality, Quality Assurance and Safeguarding, WCC and RBKC 07522 217314 kembra.healy@rbkc.gov.uk</p> <p>Emma Biskupski, Local Safeguarding Children Board (LBHF/RBKC/WCC) Business Manager 07779 348 094 emma.biskupski@rbkc.gov.uk</p> <p>Sarah Mangold, Safeguarding Practice Lead 07590 808142 sarah.mangold@rbkc.gov.uk</p> <p>Aqualma Daniel, Child Protection Advisor (including referrals to LADO) adaniel@westminster.gov.uk</p>
Prevent	<p>Tina Bencik, Prevent Co-ordinator, RBKC & LBHF (to End March 20) 07977 471 316 tina.bencik@lbhf.gov.uk</p> <p>Julie Knotts Prevent Education Officer 07940 024 366 jknotts@westminster.gov.uk</p> <p>David Ellard Bi-Borough Prevent Officer 020 8753 5727 prevent@lbhf.gov.uk</p> <p>General Enquiries & Training prevent@westminster.gov.uk</p>
Tri Borough FGM Advice/guidance:	<p>Rochelle-Ann Naidoo, Tri-borough Senior Practitioner, 020 7641 1610 rnaidoo@westminster.gov.uk</p>

MASH	Tri Borough MASH MARAC (which includes Operation Makesafe Operation Encompass) 07570 357 983	
LADO	Sharon Ackbersingh, LADO (Local Authority Designated Officer) 07714 845702 sharon.ackbersingh@rbkc.gov.uk	
Other useful contact details	Childline	0800 1111
	NSPCC	0808 800 5000
	Kidscape (Anti-bullying helpline of parents)	0845 120 5204
	Child Exploitation Online Prevent (CEOP)	0870 000 3344

Appendix B: Further information on signs of abuse

Physical abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Unexplained bruises and welts on the face, throat, arms buttocks thighs or lower back in unusual patterns or shapes which suggests the use of an instrument • Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks • Scald marks –immersion burns produce ‘stocking’ or ‘glove’ marks on feet and hands or upward splash marks which may suggest hot water has been thrown over a child • Human bite marks • Broken bones 	<ul style="list-style-type: none"> • Behavioural extremes (withdrawal, aggression or depression) • Unbelievable or inconsistent explanations of injuries • Fear of parents being contacted • Flinching when approached or touched • Truancy or running away from home

Emotional abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Eating disorders, including obesity or anorexia • Speech disorders (stammering) • Nervous disorders (rashes, hives, facial tics, stomach aches) 	<ul style="list-style-type: none"> • Fear of parent being approached • Fear of making mistakes • Developmental delay in terms of emotional progress • Cruel behaviour towards children, adults or animals • Self-harm • Behavioural extremes, such as overly compliant-demanding, withdrawn-aggressive, listless-excitabile

Sexual abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Torn, stained or bloody underclothes • Pain or itching in genital area • Bruises or bleeding near genital area or anus • Sexually transmitted infections • Pregnancy • Discomfort when walking or sitting down 	<ul style="list-style-type: none"> • Self-harm • Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level • Sudden or unexplained changes in behaviour • Avoidance of undressing or wearing extra layers of clothing • Truancy • Regressive behaviours (bed-wetting or fear of dark)

Neglect

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Height and weight significantly below age level • Poor hygiene (lice, body odour etc) • Inappropriate clothing for weather conditions • Indicators of prolonged exposure to the 	<ul style="list-style-type: none"> • Erratic attendance at college • Chronic hunger or tiredness • Having few friends • Assuming adult responsibilities

<p>elements (sunburn, chapped extremities, insect bites)</p> <ul style="list-style-type: none"> • Constant hunger, sometimes stealing food from others 	
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Child sexual exploitation

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Tiredness or mood swings • Bruising • Sexually transmitted diseases • Pregnancy 	<ul style="list-style-type: none"> • Sudden decline in college performance, punctuality, attendance • In possession of expensive goods • Going to place they cannot afford • Age-inappropriate clothing • Inappropriate sexualised behaviour • Secretive • Mixing with older people • Misuse of drugs and alcohol

Child criminal exploitation and county lines

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • See sections on physical and sexual abuse • Carrying weapons 	<ul style="list-style-type: none"> • Self-harming • Persistently going missing from college or home and/or being found out of area • Unexplained acquisition of money, clothes or mobile phones • Excessive receipt of texts/phone calls and/or having multiple handsets • Relationships with controlling older individuals or groups • Significant decline in college performance • Gang association or isolation from peers or social networks

Female genital mutilation

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Difficulty walking, sitting or standing • Bladder or menstrual problems • Severe pain and bleeding • Infections such as tetanus, HIV and hepatitis B and C 	<ul style="list-style-type: none"> • Abroad for a prolonged period • Unusual behaviour after a period of absence • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations

Forced marriage

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Cut or shaved hair as a form of punishment for 	<ul style="list-style-type: none"> • Absence from college

being disobedient	<ul style="list-style-type: none"> • Failure to return from visit to country of origin • Self-harm or attempted suicide • Running away from home • Early marriage of siblings • Sudden announcement of engagement to a stranger • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations
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Grooming

Physical signs	Behavioural signs
See section on sexual abuse	<ul style="list-style-type: none"> • Spending increasingly prolonged time online • Having older boyfriends or girlfriends • Secretiveness about who they are talking to online and what sites they visit • Possession of electronic devices such as mobile phones or webcams that parents have not provided • Engaging less with their usual friends • Using sexual language that you would not expect them to know • Going to unusual places to meet people • Using drugs and/or alcohol • Going missing from home or college

Radicalisation

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • out of character changes in dress, behaviour and peer relationships 	<ul style="list-style-type: none"> • Showing sympathy for extremist causes • Glorifying violence • Evidence of possessing illegal or extremist literature • A sudden disrespectful attitude towards others • Increased secretiveness, especially in relation to internet use • Unwillingness or inability to discuss their views • Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League

Further information and guidance on abuse and safeguarding issues is provided in Keeping children safe in education Part 1 and Annex A [September 2020]), a copy of which is included in Appendix D of this document.

Appendix C: Responsibilities of the DSL

Job description for the Designated Safeguarding Lead (DSL and DDSLs)	
The college is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment	
Summary of the role	<ul style="list-style-type: none"> • To take lead responsibility for safeguarding and child protection (including online safety) occurring at the college and to support all other staff in dealing with any child welfare and child protection concerns that arise. • To have the status and authority within the college to carry out the duties of the post including committing resources, and where appropriate, supporting and directing other staff to safeguard and promote the welfare of students. • Whilst the activities of DSL can be delegated to appropriately trained deputies (DDSLs), the ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated. • To take part in strategy discussions and inter-agency meetings and to support other staff to do so, and to contribute to the assessment of students. • To promote and safeguard the welfare of students in the college.
Main duties and responsibilities	Further specifics:
Managing referrals	<p>You are expected to:</p> <ul style="list-style-type: none"> • refer cases of suspected abuse of any student at the college to the local authority children's social care; • support staff who make referrals to local authority children's social care; • refer cases to the Channel programme where there is a radicalisation concern; • support staff who make referrals to the Channel programme; • refer cases where a person is dismissed or left due to risk/harm to a child to Disclosure and Barring Service (DBS); and • refer cases where a crime has been committed to the Police.
Work with others	<p>You are expected to:</p> <ul style="list-style-type: none"> • act as a point of contact with the three safeguarding partners: the local authority (Royal Borough of Kensington and Chelsea); the clinical commissioning group; and the police; • liaise with the Principal to inform him of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; • as required, liaise with the "case manager" (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child protection concerns in cases which concern a staff member; • liaise with staff (especially pastoral support staff, IT staff, First Aiders, and the named persons with oversight for SEND) on matters of safety and safeguarding (including

	<p>online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and</p> <ul style="list-style-type: none"> • to act as a source of support, advice and expertise for all staff.
Training	<p>You are expected to ensure your child protection training and that of the DDSLs is sufficient and appropriate to provide the knowledge and skills required to carry out this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training.</p> <p>In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role in order to:</p> <ul style="list-style-type: none"> • understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements; • have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so; • ensure each member of staff has access to, and understands, the college or college’s child protection policy and procedures, especially new and part-time staff; • be alert to the specific needs of children in need, those with special educational needs and young carers; • understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; • understand the importance of information sharing, both within the college, and with the three safeguarding partners, other agencies, organisations and practitioners; • be able to keep detailed, accurate, secure written records of concerns and referrals; • understand and support the college with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation; • be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at college; • be able to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online; • obtain access to resources and attend any relevant or refresher training courses; and • encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.
Raising awareness	<p>You are expected to:</p> <ul style="list-style-type: none"> • ensure that the college's child protection policies are known, understood and used appropriately; • ensure the college’s safeguarding policy is reviewed annually (as a minimum) and the

	<p>procedures and implementation are updated and reviewed regularly, and work with the Board regarding this,</p> <ul style="list-style-type: none"> • ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this; and • link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and • help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that students, including students with a social worker, are experiencing, or have experienced, with teachers and college leadership staff. The role could include: <ul style="list-style-type: none"> ○ ensuring that the college, and their staff, know who these students are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; and ○ supporting teaching staff to identify the challenges that students in this group might face and the additional academic support and adjustments that they could make to best support these students.
Child protection files	<p>You are expected to:</p> <ul style="list-style-type: none"> • ensure that when a student leaves the college their child protection file is transferred to the new school or college as soon as possible; • ensure child protection files are transferred separately from the student’s main file in a secure manner and confirmation of receipt is received from the destination school or college; • consider whether it is appropriate to share any information with the new school or college in advance of the student leaving
Availability	<p>You are expected to:</p> <ul style="list-style-type: none"> • ensure during term time either the Designated Safeguarding Lead (or a deputy) will always be available during college hours (9 am – 6 pm) to discuss any safeguarding concerns; and • Arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Appendix D: Part One of Keeping children safe in education (2020) and Annex A: Further Information



Department
for Education

Keeping children safe in education

Statutory guidance for schools and colleges

Part one: Information for all school and college staff

September 2020