

Safeguarding and Child Protection Policy

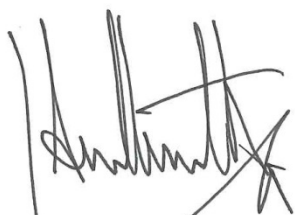
2017-2018

Reviewed by P Stafford and S Boyes: 29 August 2017

Approval by the Board: 26 September 2017

Next review: September 2018

1. 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. This policy has regard to statutory guidance *Keeping children safe in education* (2016), *Working together to safeguard children* (2015) and *Prevent Duty Guidance for England and Wales 2015* and is in accordance with the Tri-Borough's locally agreed inter-agency procedures. 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



Nigel Stout
Chairman of the Board

Aims

2. 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.
3. 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* (2016) 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 Children Board 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 policies for First Aid and Mental Health and Wellbeing);
- 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 (2016) defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children's 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* 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.

Designated Safeguarding Lead (DSL)

4. 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, Oliver Milton and Aris Rogkotis (Directors of Studies). 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
Oliver Milton	020 7835 1355	oliver.milton@mpw.ac.uk
Aris Rogkotis	020 7835 1355	aris.rogkotis@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.

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.

5. 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, who is 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 or Volunteers* below should be followed.
6. 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.
7. The responsibilities of the DSL are set out in Annex B of *Keeping children safe in education* and in summary 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;
 - 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 *Prevent 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.
8. 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. 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.

Staff training

9. 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, have child protection training which is updated regularly (at least annually) in accordance with Tri-borough Local Safeguarding Children Board guidance and procedures.

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 staff Code of Conduct;
- Whistleblowing policy;
- the role, identity and contact details of the DSL and Deputy DSLs; and
- a copy of Part One of *Keeping children safe in education (2016)*, including *Annex A: Further Information*, which is appended to this policy (see Appendix C).

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) and the Chairman of the Board will receive appropriate training to enable them to fulfil their safeguarding responsibilities.

Duty of staff, board members and volunteers

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

- protect students from harm or abuse;
- 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 in accordance with this policy.

The MPW Board ensures that the college's safeguarding arrangements take into account the procedures and practice of the Tri-borough Local Safeguarding Children Board. The nominated Board member for safeguarding is Steve Boyes. 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.

Early Help and Young people who may be vulnerable

11. 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, anxiety 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 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; it is required reading for all members of staff. What follows below is with regards to safeguarding against child abuse.

What is child abuse?

12. 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). They may be abused by an adult or adults or by another child or children. 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.

Forms of child abuse

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

- **Physical:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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 or adverse effects on the child's development. It may include 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 development; capability as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying) causing children 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 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 anal 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 (including via the internet). Sexual abuse is not solely perpetrated by 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 impairment of the child's health or development. Neglect may occur during pregnancy 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 or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision; or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

14. Other forms of abuse:

- **Child sexual exploitation (CSE):** is a form of child sexual abuse. It 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. It is therefore important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

- **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 unauthorized absence or a student being removed from the college roll under the circumstances outlined in KCSIE. For further details, refer to the college's Missing Student Policy.
- **Honour-Based Violence (HBV) and Female Genital Mutilation (FGM).** So-called 'honour-based' violence (HBV) encompasses crimes which have been committed supposedly to protect or defend the honour of the family and/or community, including FGM, forced marriage and practices such as breast ironing. All forms of HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.

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.

- **Radicalisation:** The current threat of radicalisation in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The college is clear that this exploitation and radicalisation will be viewed as a safeguarding concern. All students and staff

have the right to speak freely and voice their opinions. However, free speech is not an unqualified privilege but is subject to laws and policies governing equality, human rights, community safety and community cohesion.

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 C. Appendix B contains further information on signs of abuse. Appendix C contains part one of *Keeping children safe in education* (2016).

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
- 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 Children's Board; the DfE advice note [*What to do if you're worried a child is being abused*](#) (2015); and the [NSPCC](#) website.

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

15. 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);
- 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; and
- keep a sufficient written record of the conversation. The record should 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 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.

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 or Volunteers* below should be followed.

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.

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 C). 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*).

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

16. 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 Children Board;
- 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;
- the best interests of the child;
- the child's wishes or feelings; and
- issues of confidentiality, so far as applicable.

Making referrals

17. 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 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.

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 without delay and in any event within 24 hours. 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*).

External agencies

18. 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.

Contact details for agency involvement

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

Hilary Shaw

07817 365 519 / 020 7598 4876

hilary.shaw@rbkc.gov.uk

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

Kembra Healy

020 8753 5125

kembra.healy@lbhf.gov.uk

Further contact details are listed in Appendix A.

Allegations against members of staff and volunteers

20. 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 (2016)*.

21. 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; or
- 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 students.

The college will not make its own decisions about what appear to be borderline cases and any doubts or concerns will be discussed with the Local Authority Designated Officer in the first instance. The college will not undertake its own investigation without prior consultation with the Local Authority Designated Officer, or in the most serious cases the police, so as not to jeopardise statutory investigations. The Local Authority Designated Officer will be informed immediately and in any event within one working day of all allegations against staff and volunteers that come to the college's attention and appear to meet these criteria.

Any allegations not meeting these criteria will be dealt with in accordance with the Tri-borough Local Safeguarding Children Board's procedures.

All such allegations must be dealt with as a priority so as to avoid any delay. Allegations against a tutor who is no longer teaching and historical allegations will be referred to the police.

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

Where an allegation or complaint is made against a member of staff or volunteer or the DSL, the matter should be reported immediately to the Principal, or in his absence to Nigel Stout (nigel.stout@mpw.ac.uk), who is the Chairman of the MPW Board.

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, Nigel Stout, or in his absence to the member of the Board with responsibility for child protection, Steve Boyes (sboyes.rubric@gmail.com), without first notifying the Principal.

If an allegation is made against a member of the Board, the allegation should be reported to the Chairman or the member of the Board with responsibility for child protection. If either the Chairman or the nominated member of the Board is the subject of an allegation, the matter should be reported to the other.

The Principal, Chairman or nominated member of the Board for child protection, 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 or Chairman or nominated member of the Board 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 and nominated member of the Board.

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

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.

Action to be taken against the accused

The college will ensure that effective support is provided for anyone facing such an allegation and a representative will be appointed to keep him/her informed of the progress of the case and to consider other support available.

When dealing with allegations against staff the following should be borne in mind:

- Suspension will not be an automatic response 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 Local Authority Designated Officer will be consulted as to the appropriate action to take and full consideration will be given to all the options and whether the result that would be achieved by suspension could be obtained by alternative arrangements, subject to the need to ensure the safety and welfare of the student, and the need for a full and fair investigation.

- A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded by the college and the individual notified of the reasons. Appropriate support will be provided for the suspended individual and contact details to access that support will be provided.
- 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 and/or the provision of a mentor to provide assistance in the short term. The college will also consider how to manage the contact with the student who made the allegation.

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 *Behaviour and Discipline Policy*.

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 an allegation will be recorded on the employee's file and 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). Allegations that are found to be malicious will be removed from personnel records and any that are proven to be false, unsubstantiated, or malicious will not be referred to in employer references.

Ceasing to use staff

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 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 National College for Teaching and Leadership should be made, as per the advice set out in the NCTL document [*Teacher misconduct: information for teachers*](#) appears in the guidance published by the NCTL. The reasons for the NCTL 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 NCTL 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.

Allegations against other students (peer on peer abuse)

22. 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), gender based violence/sexual assault and sexting. Staff should always be clear that abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up".

Allegations against pupils 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 i.e 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.

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

Whistleblowing

23. 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.

Safer recruitment

24. 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 (2016)*. 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*.

Guidance to staff

25. 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.

Teaching students to keep themselves safe

26. 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 and educating students about specific safeguarding issues such as online safety, radicalisation, grooming, child sexual exploitation, healthy relationships, mental health, substance misuse and bullying. These issues are explored in a variety of contexts, including academic and PHSE 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 Welfare](#)) 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. Staff are also aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation.

Missing student procedures

27. 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.

The college recognises that a child going missing from education is a potential indicator of abuse or neglect. The procedures in this policy will be followed when dealing with children who go missing from education, particularly on repeat occasions, to help to identify the risk of abuse and neglect and to help prevent the risks of them going missing in the future. Where a child is going to be deleted from the roll, the college will inform the local authority in which the child resides in the applicable circumstances. See also *Annex A: Further Information* in Appendix C.

Informing parents

28. 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.

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.

Secure college premises

29. MPW will take all practicable steps to ensure that college premises are as secure as circumstances permit. A 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.

Confidentiality and information sharing

30. 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 (March 2015)*, the *Prevent Duty Guidance for England and Wales (2015)* and *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)*.

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.

Monitoring

31. 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 MPW London 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.

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

Other Relevant Policies

32. 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

Appendix A: Contact Details

Tri-borough contact details for consultation and referrals concerning safeguarding and child protection:

- Westminster – 020 7641 4000 (Out of hours – 020 7641 6000)
- Hammersmith and Fulham – 020 8753 6600 (Out of hours – 020 8748 8588)
- Kensington and Chelsea – 020 7361 3013 (Out of hours - 020 7361 3013)

Safeguarding and Child Protection Training, Consultation and Advice:

- Hilary Shaw – Tri-borough Safeguarding and Child Protection in Schools and Education Officer (Tel: 020 7598 4876, Mobile: 07817 365 519, email: hilary.shaw@rbkc.gov.uk)
- Marissa Asli – Tri-borough Safeguarding and Education – Liaison and Training Co-ordinator (Tel: 020 7598 4886, Mobile: 07739 315 432, email: marissa.aslibangura@rbkc.gov.uk)

Children's Health and Social Care Services

For children in need or at risk:

- General number (24 hours) - 020 7361 3013
- Email: socialservices@rbkc.gov.uk

Allegations against staff – Contact details for the tri-borough local authority's designated officer for referral and management of allegations against staff:

- Kembra Healy (Tel: 020 8753 5125, Email: kembra.healy@lbhf.gov.uk)

Advice and support about extremism

- Local Authority Prevent Lead for RBKC and LBHF – Jake Butterworth (Tel: 020 8753 5843, Email: jake.butterworth@lbhf.gov.uk)
- DfE telephone helpline and mailbox for on emergency advice 020 7340 7264 and counter-extremism@education.gsi.gov.uk
- Non-emergency police number: 101

Reporting cases of suspected female genital mutilation (FGM)

- Tri-borough Lead for FGM – Gourita Gibbs (Tel: 020 7641 1610, Email g.gibbs@westminster.gov.uk)
- Non-emergency police number: 101

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, cigarette 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 about behaviour • 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 elements (sunburn, chapped extremities, insect bites)• Constant hunger, sometimes stealing food from others	<ul style="list-style-type: none">• Erratic attendance at college• Chronic hunger or tiredness• Having few friends• Assuming adult responsibilities

Grooming

Physical signs	Behavioural signs
<ul style="list-style-type: none">• See section on sexual abuse	<ul style="list-style-type: none">• Wanting to spend increasingly prolonged time online• 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• Becoming emotionally volatile• 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

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">• Absent 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

Radicalisation

Early indicators of radicalism are:

- showing sympathy for extremist causes
- glorifying violence
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations such as “Muslims Against Crusades” or other non-proscribed extremist groups such as the English Defence League
- out of character changes in dress, behaviour and peer relationships.

Broad government guidance on the following is also available via the GOV.UK website (see Part one Keeping children safe in education [September 2016])

- [bullying including cyberbullying](#)
- [children missing education](#)
- [child missing from home or care](#)
- [child sexual exploitation](#)
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [hate](#)
- [mental health](#)
- [missing children and adults](#)
- [private fostering](#)
- [preventing radicalisation](#)
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)

Appendix C: Part One of Keeping children safe in education (2016) and Annex A: Further Information