



Safeguarding and Child Protection Policy

Designated Safeguarding Leads:

- **Antonia Evans**
- **Mike Finn**

Safeguarding Governor: Elizabeth Phillips (Chair of Governing Body)

<http://www.londoncp.co.uk/>

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Introduction

Equality and Diversity Statement

Sir Simon Milton Westminster UTC strives to treat all its members and visitors fairly and aims to eliminate unjustifiable discrimination on the grounds of gender, race, nationality, ethnic or national origin, political beliefs or practices, disability, marital status, family circumstances, sexual orientation, spent criminal convictions, age or any other inappropriate grounds.

Purpose:

- We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our students from harm, and that the young person's welfare is our paramount concern.
- Our College should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child/ young person.
- This policy sets out how we will achieve this.

Aim(s):

The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our College to identify, assess, and support those children who are suffering harm.

The College aims to create and maintain a safe environment for young people and similarly for students who are over eighteen, staff, volunteers, and visitors. The College is committed to working with all other agencies.

- To promote an environment that is safe, where staff and students treat each other with mutual respect and develop good relationships built on trust.
- To raise the awareness of all staff of the need to safeguard young people and vulnerable adults and of their rights and responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of supporting young people and vulnerable adults known or thought to be at risk of harm, and ensure we, the College, contribute to assessments of need and support packages for those students.
- To ensure that relevant information about a young person or vulnerable adult at risk of harm is disseminated to appropriate staff within the College on a 'need to know' basis.
- To emphasise the need for good levels of communication between all members of staff

- To develop a structured College Procedure which will be followed by all members of staff in cases of suspected abuse.
- To support the development of effective working relationships with other agencies, particularly the Police and Children’s Services.
- To ensure that all relevant policies and procedures within the College are linked to, and comply with, the Sir Simon Milton Westminster UTC Safeguarding Policy and Procedures.
- To support young people’s and vulnerable adults’ development in ways that will foster security, confidence and independence and to promote this through the curriculum, the pastoral programme and the Student Council.
- To ensure that all staff working with our young people who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory Disclosure & Barring Service (DBS) check (according to guidance) and a central record is kept for audit.

Consultation:

This policy was written by Mike Finn, after consultation with Reading UTC.

Sources and references:

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with government publications: “Working Together to Safeguard Children” 2013, Revised Safeguarding Statutory Guidance 2 “Framework for the Assessment of Children in Need and their Families” 2000, “What to do if You are Worried a Child is Being Abused” 2003. The guidance reflects, both “Keeping Children Safe in Education” 2014/ 2016, and London Child Protection Procedures and Practice Guidance.

Text in **purple** highlights key policy additions from Keeping Children Safe in Education, September 2016.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

<https://www.nspcc.org.uk/preventing-abuse/safeguarding/>

<https://www.rbkc.gov.uk/sharedservices/lscb/professionals/wccsafeguardingcontacts.aspx>

<http://www.londoncp.co.uk/index.html>

Reading UTC, Lincoln UTC safeguarding policies

Linked policies

Anti-bullying

Attendance

Behaviour for learning

Recruitment and Selection & Safer Recruitment

Central Record of Recruitment and Vetting Checks Policy

Staff code of conduct

Whistleblowing

Racist incidents

Prevent strategy

Confidentiality and Disclosure in Child Protection

Health and safety

eSafety

Looked After Children

Physical Intervention

Educational visits

Link governor

Elizabeth Phillips (Chair Designate).

Key contacts

Role	Name	Contact
Designated safeguarding lead	Michael Finn safeguarding@westminsterutc.ac.uk	**
Deputy Designated safeguarding leads	Antonia Evans	**
Nominated governor for safeguarding and child protection	Elizabeth Phillips	**

Chair of governors	Elizabeth Phillips	**
Local Authority Designated Officer (LADO)	<p>Westminster Access Team – Tel: 020 7641 4000 (Out of hours – 020 7641 6000) Email: AccesstoChildrensServices@westminster.gov.uk</p> <p>For case consultations or LADO referrals, please contact the Duty Child Protection Advisor in the first instance on Tel: 0207 641 7668 or email LADO@westminster.gov.uk</p>	
MASH Team (Multi Agency Safeguarding Hub)	<p>https://www.rbkc.gov.uk/sharedservices/lscb/professionals/mash.aspx</p> <p>Sarah Moran</p>	
Children’s Social Care – for reporting concerns	<p>During office hours</p> <p>Between 9am and 5pm, contact us as normal: 020 7641 4000</p>	
	<p>Emergency duty team</p> <p>If you need a service in an emergency between 5pm and 9am weekdays or 24 hours a day at weekends and bank holidays, you can contact the Emergency Duty Team on 020 7641 2388.</p>	

Coverage

- The policy applies to all governors, staff, agency workers, contractors, visitors and volunteers working in the College.

Definitions

For the purposes of the Safeguarding Policy:-

- A 'child or young person' means any person under the age of 18 (i.e. those who have not yet reached their 18th birthday).
- 'Staff' means all employees, full-time and fractional, and all agency, franchise, contract and volunteer staff working for the College.

Prevention

We recognise that the College plays a significant part in the prevention of harm to our young people by providing them with good lines of communication through trusted adults, supportive friends and an ethos of protection.

The College community will therefore:

- Work to establish and maintain an ethos where young people feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with young people e.g. through safety questionnaires, qualitative feedback participation, focus groups and in tutorials etc.
- Ensure that all young people know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including pastoral and citizenship education, opportunities which equip students with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include topics such as anti-bullying and cyber bullying, e-safety, health education and preventing radicalisation.
- Ensure all staff are aware of College guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.
- Ensure that statements about or allegations of abuse or neglect made by young people must be taken seriously.

Safe College, Safe Staff

All members of the governing body understand and fulfil their responsibilities, namely to ensure that:

- There is a Safeguarding and Child Protection policy together with a Staff Code of Conduct policy.
- The UTC operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training.
- The UTC has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- A senior leader has Designated Safeguarding Lead (DSL) responsibility.
- On appointment, the DSLs undertake training at DSL level.
<https://www.rbkc.gov.uk/sharedservices/lscb/trainingandresources.aspx>
- All other staff have safeguarding training updated as appropriate (but at least annually).
- Staff receive regular updates via e-mail and focus segments in staff meetings to keep their skills and knowledge up-to-date.
- Any weaknesses in Child Protection are remedied immediately.
- A member of the Governing Body, usually the Chair, is nominated to liaise with the Local Authority (LA) on Child Protection issues and in the event of an allegation of abuse made against the Principal.
- The College recognises that children with special educational needs (SEN) face additional safeguarding challenges.
- Child Protection policies and procedures are reviewed annually and that the Safeguarding policy is available on the school website or by other means
- The Designated Safeguarding Lead (DSL), the Joint Headteacher, **Mike Finn**, will take lead responsibility for child and vulnerable adult protection and receives appropriate training and support and adequate resources to carry out this role. The Lead Deputy Designated Safeguarding Lead is **Antonia Evans**. The Deputy DSL has training up to the same standard as the DSL.
- One of the DSL's will always be on site during the main College opening hours.

- All staff are expected to contact Mike Finn for advice, when necessary, or to make referrals. A flow chart illustrating the referral process is available in *Appendix 3*.
- The DSL's who are involved in recruitment and at least one member of the governing body will also complete Safer Recruitment Training (currently on-line on the DfE website or through approved external providers) to be renewed every 5 years.
- All members of staff and volunteers are provided with Safeguarding awareness information at induction, including in their arrival pack, the College safeguarding statement so that they know who to discuss a concern with.
- All members of staff are trained in and receive annual in e/ online safety and reporting concerns. **The College has an appropriate network filtering and monitoring system in place.**
- **Staff are trained in their awareness of the 'Early Help' process and have an understanding of their role to take timely action to help a child if they have a safeguarding concern.**
- All other staff and governors have child protection awareness training, updated by the DSL/DDSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- All members of staff, volunteers and governors know how to respond to a student who discloses abuse.
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the College's Safeguarding Policy, and reference to it on the website.
- If parts of the building are let, the UTC will seek to ensure the suitability of adults working with Students on College site at any time.
- **The College recognises the importance of data sharing between agencies, and will ensure that Data Protection fears do not stand in the way of information sharing.**
- **The College always liaises with other/ multiple agencies when working with a child where there are concerns about sexual exploitation.**
- Community users organising activities for Students are aware of the College's Safeguarding guidelines and procedures, and the appropriate checks are in place.
- **Online safety is included in relevant lessons.**

- Training is provided to staff to ensure that they have an awareness of 'looked after children'. This training will detail the action staff should take if they have concerns. The Teacher Responsible for 'looked after children' is Clare McLoughlin, and a strategy for supporting 'looked after children' is contained within the Looked after Children Policy.
- Allegations against adults working in the College are referred, by one of the Joint Headteachers to the 'LADO' for advice, and that any member of staff found not suitable to work with Students will be notified to the Independent Safeguarding Authority for consideration for barring, following resignation, dismissal, or in the case of a volunteer, when we cease to use their service as a result of a substantiated allegation.
- Our procedures will be regularly reviewed and up-dated.
- The College has systems for monitoring absences, and in particular the monitoring of absence for young people deemed to have serious safeguarding issues early in the College day. In addition, a procedure is in place for children who are missing in education, particularly on repeat occasions, to help identify the risk of abuse and neglect. The College uses a first call system to monitor unauthorised/ unexplained absences.
- The name of the designated members of staff for Safeguarding will be clearly advertised in the College, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- Teaching Staff will be made aware of their personal mandatory duty to report Female Genital Mutilation (FGM).
- All new members of staff will be given a copy of our safeguarding statement, and Safeguarding policy, with the DSL and Deputy DSL's names clearly displayed, as part of their induction into the College.
- The policy is available publicly on the College website and via hard copy from the main office. Parents/carers are made aware of this policy and their entitlement to have a copy of it via the UTC website.
- All visitors to the College will be made aware of their obligations in relation to the Safeguarding and Child Protection policy. Visitors will sign in through the computerised terminal at reception, where an ID badge and photograph will be taken. Those staff who are DBS cleared will have this notified on their badge. Visitors are required to 'agree' to uphold the Safeguarding policy (on the computer) and each visitor will receive a Safeguarding leaflet to take away with them.

Responsibility for Child Protection

The Designated Safeguarding Lead, and Deputy Designated Safeguarding Lead are responsible for:

- Referring a child if there are concerns about possible abuse, to the Students' Services Area Team, and acting as a focal point for staff to discuss concerns. Referrals should be made in writing, following a telephone call to the MASH team using the Multi Agency Referral Form (MARF). Definitions of abuse are included in *Appendix 2*.
- Keeping written records of concerns about a child even if there is no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely and are separate from general students records/main files, until the child's 25th birthday, and are copied on to the child's next school or UTC (if they are under 18 at the time of progression).
- Ensuring that an indication of the existence of the additional file is marked on the student's main file
- Ensuring that all inductee's files are retrieved from their feeder schools, carefully tracking and auditing this process. Requests to pass over safeguarding files will be made directly on behalf of the DSL to the DSL of the feeder school.
- Liaising with other agencies and professionals.
- Ensuring that either they or the appropriate staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
- *All staff are expected to contact Mike Finn or Antonia Evans or another DSL/ DDSL for advice, when necessary, or to make referrals.*

Advice for staff when managing a disclosure is given in *Appendix 1*.

Allegations against Staff

- All UTC staff should take care not to place themselves in a vulnerable position with a young person. It is always advisable for interviews or work with individual students or parents to be conducted in view of other adults. For additional advice please see *Appendix 4*.
- All Staff should be aware of the College's Behaviour Policy.
- Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction

- We understand that a student may make an allegation against a member of staff.
- If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with Students, the member of staff receiving the allegation or aware of the information, will immediately inform the Joint Headteacher.
- The Joint Headteacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) the Duty LADO can be contacted on 0207 641 7668
- If the allegation made to a member of staff concerns a Joint Headteacher, the person receiving the allegation will immediately inform the Chair of Governors who will consult with the LADO, without notifying the Joint Headteacher first.
- The College will follow the LSCB procedures for managing allegations against staff.
- Under no circumstances will we send a student home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the LADO.
- Suspension of the member of staff, excluding the Joint Headteacher, against whom an allegation has been made, needs careful consideration, and the Joint Headteacher will seek the advice of the LADO and HR Consultancy service in making this decision.
- In the event of an allegation against the Joint Headteacher, the decision to suspend will be made by the Chair of Governors, and the Chair will seek the advice of the LADO and HR in making this decision.
- We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

A flow chart illustrating the referral process is available in *Appendix 3*.

Whistleblowing

- The vast majority of people who work with Students are well motivated and would never harm a child or young person. Unfortunately a few do and Sir Simon Milton Westminster UTC offers a culture that makes all staff and volunteers willing and comfortable to voice their concerns.
- We recognise that Students cannot be expected to raise concerns in an environment where staff fail to do so.

- All staff should be aware of their duty to raise concerns, where they exist, about the management of Safeguarding and Child Protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the Whistleblowing Policy
- Whistle-blowing regarding the Joint Headteachers should be made to the Chair of the Governing Body whose contact details are readily available to staff.
- **Through regular updating training, staff will be made aware of additional advice regarding whistleblowing and will be provided with the whistleblowing advice line managed by the NSPCC : Contact the Whistleblowing Advice Line by telephoning 0800 028 0285 or e-mailing help@nspcc.org.uk**

Supporting Students

- We recognise that a young person who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- We recognise that the UTC may provide the only stability in the lives of young people who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our UTC will support all Students by:

- Encouraging self-esteem and self-assertiveness, through the inclusive curriculum as well as our relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the College.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of students
- Notifying Social Care as soon as there is a significant concern.
- Providing continuing support to a young person about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority.

Supporting Staff

- We recognise that staff working in the UTC who have become involved with a young person who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.
- **DSLs will receive regular supervision by a trained counsellor.**

Staff Appointments

Sir Simon Milton Westminster UTC will ensure that all UTC staff have been checked for their suitability before taking up their appointment.

Safer recruitment is overseen by the Headteacher directly.

All applicants will be scrutinised by:-

- Verifying identity and any academic or vocational qualifications.
- Obtaining professional and character references.
- Checking previous employment history.
- Holding face to face interviews, with questions asked about Safeguarding and intentions with regards to working with young people.
- Carrying out the mandatory check of the barred list through the Vetting and Barring Scheme.
- Where appropriate, an enhanced DBS check (Disclosure and Barring Service) before the candidate takes up the post. Guidance about the eligibility criteria is available at www.gov.uk/disclosure-barring-service-check/overview
- **Undertaking additional checks to ensure that staff are not prohibited from teaching. This is essential for those staff in management roles (e.g section 128 check)**
- **All Governors are required to undergo an Enhanced Disclosure and Barring Service check.**

Detailed policies relating to checks and vetting and safer recruitment are in place, and are overseen by the Headteacher (s) directly.

Work Experience

Sir Simon Milton Westminster UTC will ensure that:-

- Appropriate health and safety checks are in place prior to establishing work experience placements.

- Employers are aware of their responsibilities in relation to safeguarding and the protection of students.
- Staff are aware of the action to be taken, and by whom, should a protection issue be raised before, during or after the placement.
- Enhanced Disclosure and Barring checks, as additional safeguards, will be made when there are certain risk factors present. The risk factors include:-
 - A young person is likely to be or will be alone with an adult as part of the work placement.
 - A residential component.
 - The student is vulnerable. The UTC will identify to the placement organiser any student who may be vulnerable, for example, because of special needs, immaturity, abuse or neglect, substance misuse, etc, and who may therefore require additional safeguards.
 - Extended Work Placement (i.e. more than 10 days)
 - Sir Simon Milton Westminster UTC will ensure that where young people are placed on a regular extended work placement, staff that are in close contact with them as supervisors or mentors in the workplace are police checked in the same way as all UTC staff.

Anti-Bullying

- Our College policy on anti-bullying and peer- on- peer abuse is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under Child Protection/ Safeguarding procedures. This includes all forms e.g. cyber, racist, homophobic and gender-related bullying. We keep a record of known bullying incidents. All staff are aware that students with Special Educational Needs and Disability (SEND) and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse. We keep a record of bullying incidents on our 'anti bullying log' and the DSL provides the Trust Board with an annual report.
- All staff will receive training on peer-on-peer abuse.
- **The College trains staff and students about the risks involved with sexting, which is a form of peer-on-peer abuse. The College follows the advice set out by the UK council for child internet safety. This advice can be found at:**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2_939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

Racist Incidents

- Our policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents, on our 'anti bullying log'.

Staff Induction Training on Sir Simon Milton Westminster UTC Procedures

The initial training will ensure that all staff:-

- Know who to contact if they have a concern that a young person or vulnerable adult is at risk of serious harm.
- Know where to go for advice in relation to safeguarding or child protection issues or when they are uncertain about whether to refer a concern about a child.
- Know the UTC procedure for referrals on child protection issues, including referrals to external agencies and partner organisations.
- Understand that they have the right to contact the appropriate agencies if they feel that concerns are not being passed on appropriately by designated College staff.
- Are aware of the requirement to keep detailed, accurate, secure written records of any referrals or concerns.
- Understand the College Prevent Strategy and understand the signs of extremism/ radicalisation and the referral process to the Safeguarding Team/ Channel.
- Understand e-Safety and the risks associated with Sexting, and how to minimise the risks of harm to young people.
- Are able to recognise and respond to safeguarding and welfare concerns.
- Understand their responsibilities in being alert to the signs of abuse.
- **Understand the 'Early Help' process and their role in this.**
- Know how to respond to a student who discloses abuse or is at risk of self-harm.
- Know the College's Policy and Procedures on Confidentiality and Disclosure in Child Protection cases.
- Understand that there is a need to take special care when working with young people with special needs and to be alert to signs of abuse as these members of the UTC may not be able to raise concerns themselves.
- **Understanding of the College 'anti bullying' policy and actions to take if they suspect or are made aware of bullying incidents.**
- **Develop an awareness of 'looked after children' and the College Policy in this area.**
- **Know about whistleblowing and will be informed about the whistleblowing advice line managed by the NSPCC**
- **Understand their own duty to report Female Genital Mutilation (and the mandatory nature of this duty for Teachers).**
- Are aware of appropriate approaches to confidentiality and disclosure of information.

Sir Simon Milton Westminster UTC will:

- Provide staff with a code of conduct along with guidance on appropriate relationships with students.

Confidentiality, Reporting and Disclosure

- We recognise that all matters relating to child protection are confidential.

- The Headteachers /DSLs will disclose any information about a child to other members of staff on a need to know basis only.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard students.
- All staff must be aware that they cannot promise young person to keep secret information which might compromise the child's safety or wellbeing.
- We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult the Children's Services Area Team on this point (MASH).
- The circumstances when data should or should not be shared are outlined in a flow chart in **Appendix 3. The College recognises the importance of data sharing between agencies, and will ensure that Data Protection fears do not stand in the way of information sharing.**
- The principle of 'proportionality' applies to sharing confidential information, i.e. when disclosing information without consent the member of staff limits the extent of the disclosure to that which is absolutely necessary to protect the young person or vulnerable adult.
- Sir Simon Milton Westminster UTC recognises that young people aged 16 or 17 will have the understanding to make decisions about their own lives and their views and wishes will be respected unless they are deemed to be at risk of harm which is a serious threat to their personal safety or they are the victim of a crime. Young people under 16 may be sufficiently mature to understand and consent to the disclosure of information. The young person's ability to make such decisions should be assessed on a case-by-case basis.
- Referrals to other agencies such as Children's Social Care should be made with the young person's agreement where practicable. However, it may not be practicable to seek their agreement where, for example, seeking permission might place them or another person at risk of serious harm or where they are not mentally competent to give their agreement. There may also be cases where the young person's agreement is sought but they refuse to give that agreement. Disclosure of information can take place without consent in cases where this is justifiable in the overriding public interest – e.g. to protect the young person from significant harm.
- In the context of child protection, the welfare of the young person outweighs the family's right to privacy.

Prevention of Violent Extremism – The ‘Prevent’ Agenda

- Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have “*due regard to the need to prevent people from being drawn into terrorism*”. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty.
- **Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity.**
- College staff should be aware, through training, of signs of radicalisation and have the confidence to report their concerns to the Designated Safeguarding Lead (Mike Finn, Vice Principal) or in his absence, any member of the Senior Management Team.
- The Designated Safeguarding Lead will liaise with the contact Mark Chalmers - mchalmers@westminster.gov.uk or 020 7641 6032.
<https://www.westminster.gov.uk/safeguarding-vulnerable-individuals#prevent-and-channel-contact-details>
- The College will also promote the ethos of the ‘Prevent’ agenda by encouraging free and open debate, but challenging extreme views. It will encourage through its classroom practice, theme weeks and induction activities, a belief in Equality of Opportunity and the celebration of Diversity.
- The College will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature.
- The College has a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject in the College and must take such steps as are reasonably practicable to secure that where political issues are brought to the attention of students they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of the College and could constitute misconduct. External speakers are risk- evaluated by the SLT.
- The College will provide appropriate support through its own staff or by referral to external agencies, for any student in danger of radicalisation. The Designated Safeguarding Lead will make the decision whether to involve the police or other external agencies.
- The College uses Impero filtering as a means of restricting access to harmful internet content. This ensures that websites promoting extremist views and encouraging the radicalisation of young people are automatically blocked. Sir Simon Milton Westminster UTC has clear policies in place to identify and address instances where online materials are accessed for curriculum purposes. **A report of blocked searches is undertaken at the end of**

each day, with the Network Supervisor reporting to the Headteachers and DSL team every day a concern is raised.

Raising Awareness of Safeguarding and Protection Issues

- All parents/carers of students under eighteen will be made aware of the responsibilities of staff members with regard to child protection procedures by publicising this in an induction and information pack that is sent to students and parents. Information will also be made available through the College website: www.westminsterutc.co.uk.
- All students will be supported to understand safeguarding and protection issues through:-
 - A tutorial/ PSHE programme that will support young people's development in ways that will foster security, confidence and independence.
 - The creation of a climate in which responsible behaviour is encouraged and where students feel safe to ask for help if threatened or at risk of abuse.
 - The promotion of a healthy lifestyle that includes consideration of diet, sexual relationships, alcohol and drug abuse.
 - A list of the specific Safeguarding areas of focus, as detailed in 'Keeping Children Safe in Education' is available in *Appendix 5*.

Health & Safety

- Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our young people both physically within the College environment, and for example in relation to e-safety, and when away from the school and when undertaking College trips and visits.
- The UTC is situated on a busy street, with such street access, it is important to safeguard the College from unauthorised access. Therefore, the entry doors are placed on an exit only mode to control access.

Monitoring and Evaluation

- Sir Simon Milton Westminster UTC will review its policies and procedures to ensure that they comply with the relevant legislation and the agreed procedures in Westminster. The Safeguarding Policy will be reviewed annually and updated to remedy any deficiencies or weakness in regard to child and vulnerable adult protection arrangements that are identified without delay.

- Our Safeguarding Policy and Procedures will be monitored and evaluated by:
 - Governing Body (GB) visits to the school
 - Senior Leadership 'drop ins', learning walks and discussions with students and staff
 - Student surveys and questionnaires
 - Scrutiny of attendance data, including logs of reported absence and 'first call' investigations of absence.
 - Scrutiny of a range of risk assessments
 - Scrutiny of GB minutes
 - Logs of bullying/racist/behaviour incidents for the Joint Headteachers and GB to monitor
 - Review of parental concerns and parent questionnaires

Were changes made to the Policy when received? If YES complete the Partial Equality Analysis table.

Questions for all Policies Is it likely that the Policy Revision could have a negative impact:-		Please Tick Box	
		YES	NO
1.	On minority ethnic groups?		X
2.	Due to gender?		X
3.	Due to disability?		X
4.	Due to sexual orientation?		X
5.	Due to their religious beliefs (or none)?		X
6.	On people due to them being transgender or transsexual?		X
Additional questions for Policies relating to Staff Is it likely that the Policy Revision could have a negative impact:-			
7.	On people due to their age?		X
8.	On people due to their marital or civil partnership status?		X
9.	On people with dependants/caring responsibilities?		X

Date of Review 09.01.17 Did you make changes?

n/a	
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If YES please speak with the Headteachers as a full Equality Analysis may be required.

Safeguarding and Child Protection Policy
MFI: Feb 2018

Next review: Feb 2019
Approved by College Executive: February 2018
Approved by Governing Body: February 2018

Appendix 1

Managing a Disclosure

- If a student makes a disclosure, you must follow the steps outlined below:-
 - Never promise confidentiality – it is not possible to guarantee to a student that a disclosure of abuse will be kept confidential. Inform the student that you are bound by law to report what they disclose to the College's designated person.
 - Listen and reassure – Listen carefully to what the student is telling you. You are able to ask open questions such as 'how did that happen?' or 'what was happening at the time?' Do not ask leading questions.
 - Do not probe or make accusations – remember you are not there to investigate a disclosure. This could also compromise any further criminal investigation.
 - Make notes and record the disclosure – as soon as possible, record the conversation with the student. Remember to use the student's own words as far as possible. Use the disclosure reporting/referral form (Appendix 6).
 - Refer the disclosure to the Designated Leads. The designated staff will then make arrangements to see the student and organise further support as necessary and notify appropriate authorities. Where contact is made with external agencies, the designated person will record this on the UTCs 'external liaison log'.

Appendix 2

Definitions of Abuse

Physical abuse

This may take many forms e.g. hitting, shaking or poisoning a young person or vulnerable adult. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a young person or vulnerable adult.

Emotional abuse

This is the persistent emotional ill treatment of a young person or vulnerable adult such as to cause severe and persistent effects on their emotional development. Some level of emotional abuse is involved in most types of ill treatment of young people or vulnerable adults, though emotional abuse may occur alone.

Sexual abuse

This involves forcing or enticing a young person or vulnerable adult to take part in sexual activities. This may include non-contact activities such as looking at or producing pornographic materials, watching sexual activities or encouraging young people or vulnerable adults to behave in sexually inappropriate ways.

Female Genital Mutilation

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. 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.

Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. **Teachers must be made aware of their personal mandatory duty to report Female Genital Mutilation (FGM).**

Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines referred to below.

Guidelines for Colleges and universities sets out how staff can make a difference; 'Girls who are threatened with, or who have undergone FGM may withdraw from education, restricting their educational and personal development. They may feel unable to go against the wishes of their parents and consequently may suffer emotionally. Staff may become aware of a student because she appears anxious, depressed and emotionally withdrawn. They may be presented with a sudden decline in her performance, aspirations or motivation. There may be occasions when a student comes to College but then absents herself from lessons, possibly spending prolonged periods in the bathroom.

Students who fear they may be at risk of FGM can often come to the attention of, or turn to, a teacher, lecturer or other member of staff before seeking help from the police or social services. Sometimes the student's friends report it to staff. Teachers, lecturers and other members of staff are in an ideal position to identify and respond to a victim's needs at an early stage'

Link to DFE multi agency practice guidelines for female-genital-mutilation (April 2016)

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

Neglect

Involves the persistent failure to meet a young person or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health and development. This may involve failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

The Context of Abuse

Family Circumstances: Domestic Violence

Where there is domestic violence the implications for the vulnerable adult or young person at UTC and for younger children in the household must be considered. Young people from families with a history of domestic violence often have behavioural difficulties, absenteeism, ill health, bullying, and drug and alcohol misuse.

Drug/alcohol abusing parents

There is an increased risk of violence in families where this occurs. A young person at UTC may have to take on responsibilities for younger children in the family.

Forced Marriages

Forced marriage is an entirely separate issue from arranged marriage. Forced marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young people at risk of a forced marriage may also be experiencing physical and/or emotional abuse at home. It may be necessary to inform the Police, particularly if a student is at a significant and imminent level of risk. The Forced Marriage unit can provide additional information for College staff.

Mental Health Issues

Self-harm, suicide threats and gestures by a young person or vulnerable adult must always be taken seriously and may be indicative of a serious mental or emotional disturbance. The possibility that self-harm, including a serious eating disorder has been caused or triggered by any form of abuse or chronic neglect should not be overlooked.

Abuse by peer group: bullying, racism and abuse

Bullying is a common form of deliberately hurtful behaviour, which is usually repeated over a period of time, when it is difficult for the victims to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting); verbal (e.g. threats); and emotional (e.g. isolating the individual).

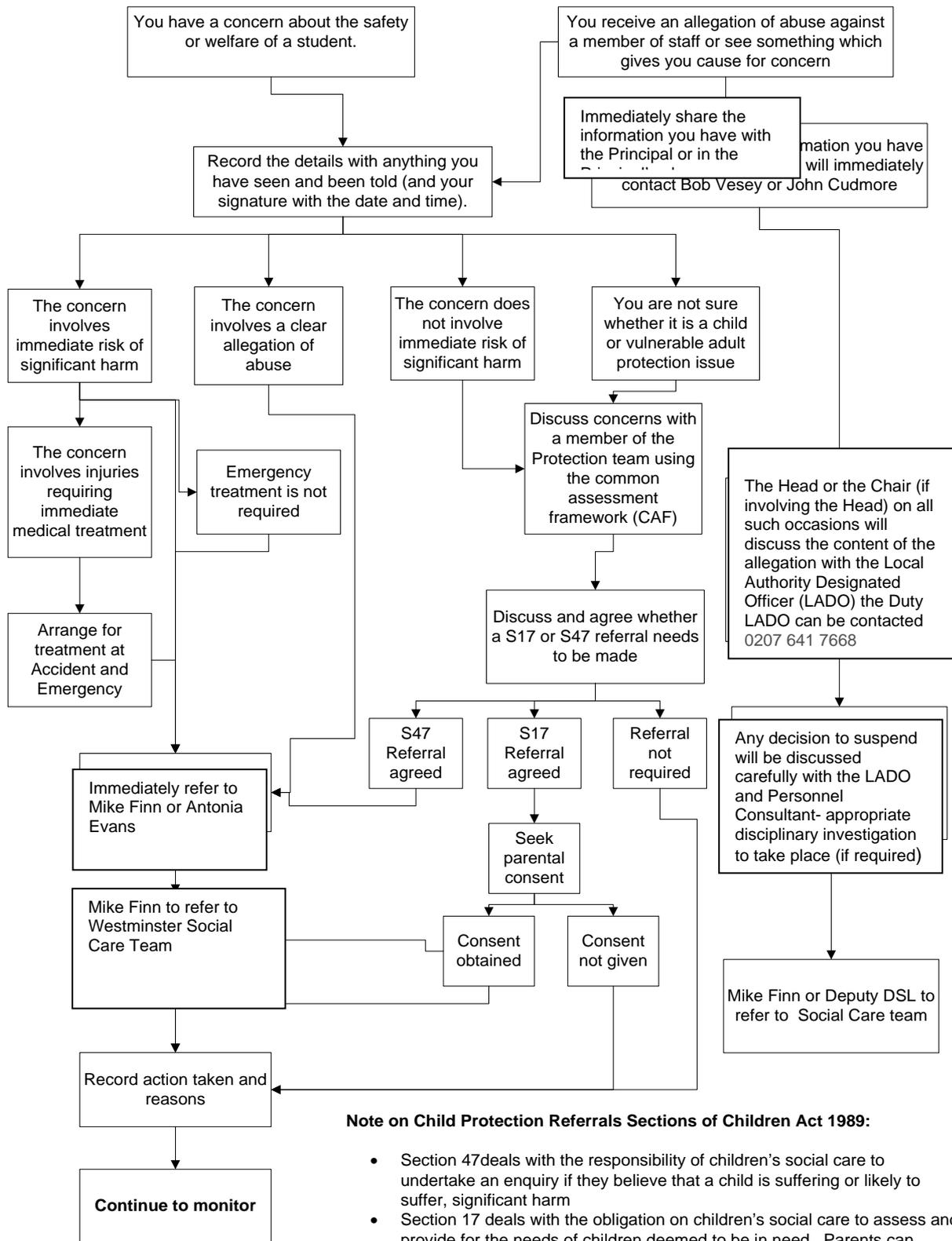
It may involve physical, sexual or emotional abuse including homophobic, sexual, racial or religious harassment, or behaviour which is offensive to those with learning or physical disabilities.

Severe harm may be caused to young people and vulnerable adults by the abusive and bullying behaviour of their peers. The damage inflicted by bullying is often underestimated and can cause considerable distress. In extreme cases it can cause significant harm, including self-harm.

Appendix 3

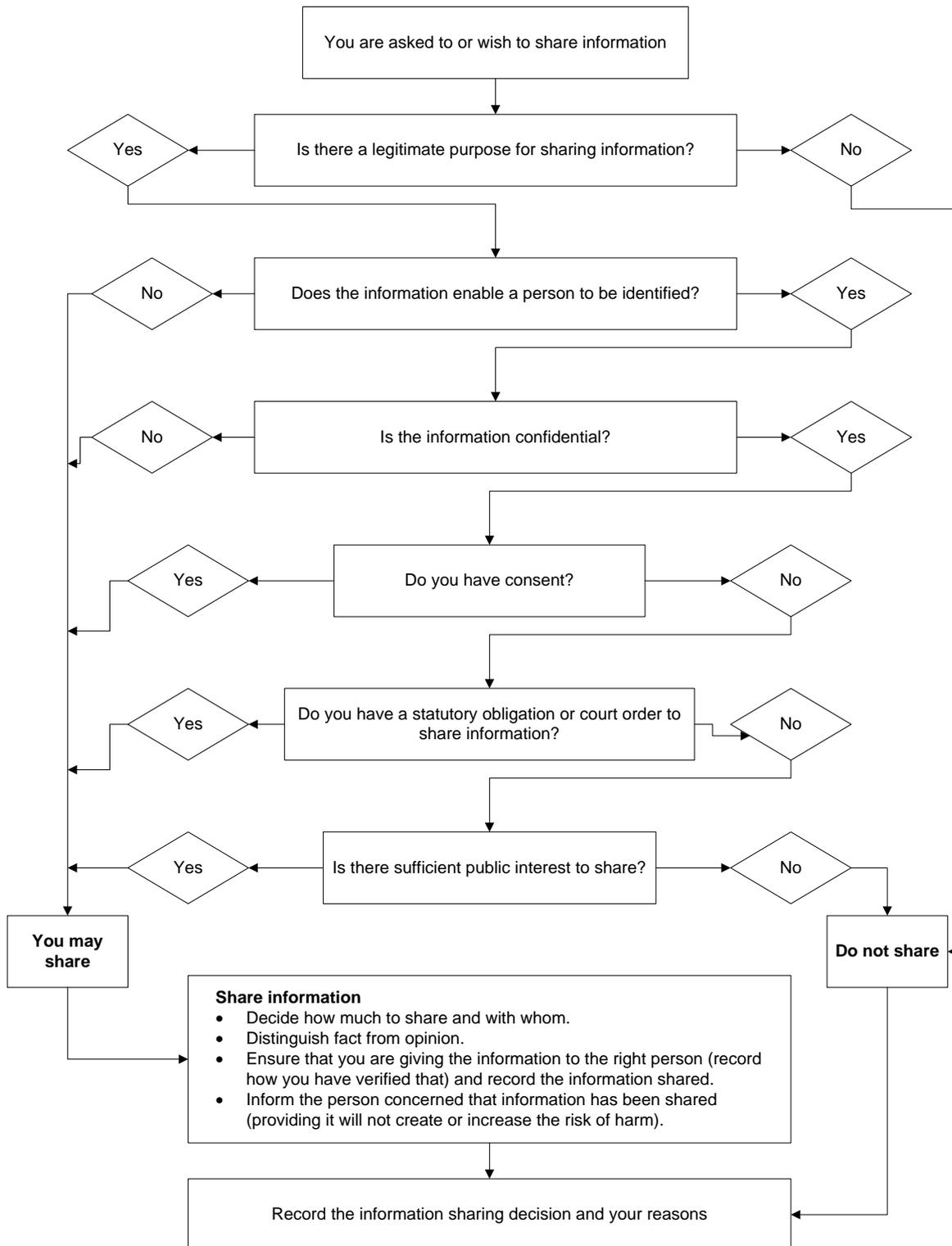
Referral and Information Sharing Flow Charts

Child Protection and Protection of Vulnerable Adults Referrals Flow Chart



**Child Protection and the Protection of Vulnerable Adults
Principles for information sharing**

Annex C



Appendix 4

Guidance on Relationships with Students

The vast majority of staff who work with young people in educational settings act professionally and seek to provide a safe and supportive environment for students. It is recognised that achieving this aim is not always straightforward. Much relies on student and staff interactions where tensions and misunderstandings can occur. It is here that staff behaviours can give rise to allegations being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

This guidance should not be interpreted to mean that, in order to avoid misplaced allegations, all forms of physical or close contact with students should be avoided. There will be occasions where physical contact is appropriate, e.g. in situations where a degree of physical intervention is required. The guidance is concerned with avoiding sexual activity in a relationship of trust and other contact which may be inappropriate.

Relationships of Trust

A relationship of trust exists where a teacher, member of staff or volunteer is in a position of power or influence over a student by virtue of the work or nature of the activity being undertaken. Those in a position of trust must carry the responsibility of ensuring that they do not abuse their position or put themselves in a position where allegations of abuse of trust, whether justified or unfounded, could be made.

It is important to recognise that a variety of circumstances can arise, including a sexual relationship at one end of the scale, through close friendships, to, at the other end of the scale, an innocent situation which has been entirely misconstrued. Staff and volunteers should take steps to minimise the risk of circumstances being misconstrued or misunderstood and relationships with language and conduct which could give rise to comment and speculation.

All staff should clearly understand the need to maintain appropriate boundaries in their dealings with students. Intimate or sexual relationships between staff and students will be regarded as a grave breach of trust. Where a relationship of trust exists, allowing a relationship to develop in a way that might lead to a sexual relationship is wrong. A sexual relationship will be intrinsically unequal within a relationship of trust and is therefore unacceptable. Abuse of trust involving sexual activity with a young person under 18 at the College may be a criminal offence under the Sexual Offences Act 2003. It is also inappropriate since the professional relationship of trust would be altered.

From time to time staff may encounter students who display attention-seeking behaviour, profess to be attracted to them or begin to develop a relationship of emotional dependency. Particular

care should be exercised if the student is vulnerable. Staff should aim to deal with those situations sensitively and appropriately, but ensure that their behaviour cannot be misinterpreted. The member of staff or volunteer should inform their line manager if they have any concerns or if there is a concern that a young person is becoming attracted to him or her, or that there is a developing attachment or dependency. If a member of staff or volunteer is concerned that s/he might be developing a relationship with a young person, which could have the potential to represent an abuse of trust, the first advice must be to ensure that the relationship does not develop further. Arrangements should be made by the line manager to minimise direct contact between the student and member of staff or volunteer and to prevent all contact if possible. Where contact must take place another member of staff should be present at all times.

Staff should be aware that private meetings with individual students might give rise to concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another student should be present or nearby. Where such conditions cannot apply, staff should ensure that another adult knows that the interview is taking place.

Students should not be asked or encouraged to visit the home of a member of staff or socialise informally outside the College. These contacts or visits can place staff in a vulnerable position and can in some case lead to allegations being made against staff. Private or additional tuition for students should be conducted on College premises or, if at the young person's home, in the presence of a parent. Meetings away from the College premises or arrangements for private tuition in a student's home should only be arranged with the specified approval of the Principal. Staff should adhere to the guidance regarding outside commitments in the Code of Conduct for Employees.

The following are examples of actions, albeit not overtly abusive, that could be interpreted as a member of staff 'grooming' a student or allowing a dependent relationship to begin or continue:-

- Inviting students to their home.
- Visit students at their home.
- Giving students gifts.
- Offering students lifts outside normal duties.
- Singling individual students out for special attention.
- Seeing students socially.

Staff should not give students their personal mobile or home telephone number, personal e-mail address or access to their own personal social media accounts (not adding students as friends on Facebook, for example).

The frequency, nature and degree of such behaviour may justify the need for further investigation.

Physical Contact

Physical contact may be misconstrued by a student, parent or observer. Touching students, including well-intentioned gestures such as putting a hand on a shoulder, can, if repeated regularly, lead to serious questions being raised, particularly if this occurs when a member of staff is alone with a student. As a general principle, staff must not make gratuitous physical contact with their students. It is particularly unwise to attribute touching to their teaching style or as a way of relating to students. Teachers and other staff do however have the right to use reasonable physical intervention to restrain students in certain circumstances. Staff should be aware of the College's policy on the use of physical intervention.

There may also be occasions where a distressed student needs comfort and reassurance which may include physical comforting such as a caring parent would give. Staff should use their discretion in such cases to ensure that what is normal and natural does not become unnecessary and unjustified contact, particularly with the same student over a period of time. Where a member of staff has particular concern about the need to provide this type of care and reassurance they should seek the advice of the Vice- Principal.

Some staff are also likely to come into physical contact with students from time to time in the course of their duties. Examples of this could include sports coaching which may involve non-sexual physical contact. Contact of this type should not take place when a member of staff is alone with a student.

Staff should comply with the expected standards of professionalism as detailed in the Staff Code of Conduct.

Appendix 5

Specific Safeguarding Focus Area (Keeping Children Safe in Education)

The guidance from the DfE *Keeping children safe in education* replaces the previous guidance *Safeguarding Children and Safer Recruitment in Education* following a long period of consultation. In essence there are no significant changes in the new guidance. There remains a statutory responsibility to keep children safe and to refer concerns to the appropriate authorities. Staff need to be 'regularly updated' about College procedures as well as when they join the College. Staff need to be vetted on recruitment. There must be a designated safeguarding lead. The four categories of abuse remain unchanged: physical abuse, emotional abuse, sexual abuse and neglect.

The only clear change from previous guidance is the emphasis placed on 'specific safeguarding issues':

- child sexual exploitation (CSE)
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- radicalisation
- sexting
- teenage relationship abuse
- trafficking

Further guidance on each of these is available on the DfE website and other sources of information are suggested

Appendix 6



Safeguarding Disclosure/Referral Form

Name of student:

Name of Parent/
Guardian

Address:

Date of Birth

Does student have any siblings? Y / N

If so, what ages?

Type of disclosure: Self / Third party / Observation

Details of disclosure/Nature of concern:

Details of any action taken (including any advice given):

Any additional points of relevance (including DSL updates)

Member of staff recording this incident:		Date:	
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Please pass the completed form to Mike Finn immediately.

To be completed by DSL

Added to Spreadsheet Risk Register (date)		
Initial risk rating (if red, a risk assessment created date)	Rating	Date of Risk Assessment
Referral Required Y/N, if Yes, date and contact/ action		Date and contact
File created (date) tab created on main file (date)	SG file created	Main file tabbed
Chronology started (date)		

PART 2: RECORD OF 'DISCLOSURE' FROM / ABOUT A STUDENT	
<i>*It is not advisable to try and complete this record at the time! The important thing is to listen actively and carefully and reassure the child or vulnerable adult!</i>	
Name of person making the 'disclosure'	
Position / relationship with child	
Name and d.o.b. of student(s) that the 'disclosure' relates to	
How did the 'disclosure' come about i.e. when and where?	
Who was present when the disclosure was made?	

Summary of Information Disclosed	
1. WHO is said to be involved	
2. WHAT is said to have happened / be happening?	
3. WHERE is this said to have happened / be happening?	

4. WHEN is this said to have happened / be happening i.e. duration, most recent occasion etc?	
5. WHO else may have witnessed what happened?	
6. HOW and where is the student now?	
Continuation Sheet Attached Y/N	
<p>Note: <i>Differentiate clearly between fact, opinion, interpretation and stick to the facts as you understand them wherever possible!</i> <i>if you have used quotes please ensure that they are accurate</i> <i>make a note of any open questions asked or minimal prompts used</i> <i>Any notes made 'at the time' should be attached to this pro-forma; these may be required as evidence if the matter goes to court</i></p>	

Abbreviations

Designated Safeguarding Lead (DSL)

Senior Leadership Team (SLT)

Local Safeguarding Children Board (LSCB)