

# SAFEGUARDING & CHILD PROTECTION POLICY (2023 - 2024)

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**Other Safeguarding Staff:**

Rebecca Moore (staff concerns only) B09

Donna Swinfen-Green (School Nurse), medical room, extension 133,

Cate Exton - (counsellor)

**If the Safeguarding Team is unavailable and your case is too urgent to await triaging via MyConcern, speak to a member of the Leadership Group**

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## **1. Introduction & Scope of Policy (including an overview of All Staff CPD)**

1.1 Safeguarding is **everyone’s responsibility** and WMSF adopts a **young person-centred, risk-averse approach** to safeguarding.

1.2 This means that all staff are involved in safeguarding students and that the student’s needs must always come first. All staff must report any safeguarding concerns they have, including emerging concerns.

1.3 Safeguarding is defined 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
- taking action to enable all children to have the best outcomes

1.4 The term ‘child’ includes everyone under the age of 18. At William Morris, we do not differentiate in our reporting expectations and how seriously we view safeguarding concerns regardless of age. There will be differences in the outcome of cases as dictated by the provision of external services.

1.5 For the purposes of this policy, students with EHCPs may be defined as a child up until the age of 25. **As WMSF caters for 16-19 year old students, we use the term “student” and “students” in place of “child” and “children” which are often found in statutory guidance.**

1.6 Technology is a significant component in many safeguarding issues. Abuse can happen online, offline, or both. Student-on-student abuse can also occur online, including abusive, harassing or misogynistic messaging, non-consensual sharing of indecent images and sharing of abusive images and pornography to those who don’t want to receive such content.

1.7 The Children's Act 1989 places on schools and LAs the duty of assisting the relevant local authority acting on behalf of students in need and of enquiring into the circumstances of students who are suffering or thought to be suffering significant harm to their physical, emotional or intellectual development.

1.8 WMSF has a 'duty of care' towards their students and to ensure their safety and well-being, in relation to both existing and emerging concerns, by engaging with services (including Early Help) as appropriate. Staff must be aware of the signs of abuse and other risks (see *Abuse* appendix), and must inform of any emerging concerns they have.

1.9 All staff must read Part One of KCSIE (September 2022) and complete the Online Level 1 Safeguarding course, by October of the same academic year. Completion of this is monitored by HR and the DSL. You must also read the Peer on Peer Abuse policy and the Staff Code of Conduct. All staff will sign to say that they have done so, understand and will adhere to these policies. They are strongly recommended to read Part Five of KCSIE (2022)

**1.9.1 Safeguarding concerns at WMSF are categorised as follows:**

Universal (Level 1)	No concerns exist beyond those which are normal for the student's age group
Vulnerable (Level 2)	The student has heightened vulnerabilities and would benefit from referral to early help services
At Risk (including Child in Need) (Level 3)	The student is considered at risk from harm, and needs to be referred to the police, NHS or social services as appropriate.
Acute/Urgent (including Child Protection) (Level 4)	The student is in significant danger and emergency action must be taken <b>immediately.</b>

1.9.2 Safeguarding concerns directly affecting the student can arise from:

- Family/home environment
- Community and wider contexts
- Other students (see *Student on Student abuse policy*)
- Self

## CPD

1.9.3 All staff attend the annual compulsory in-house CPD led by the DSL and sign the documentation and return this to HR. This provides a reminder of the key themes and an update on our internal safeguarding procedures. It also includes an overview of the relevant changes to KCSIE and provides an opportunity to provide up-to-date local information about SG threats to our students. These are also shared throughout the year in staff briefings as and when required.

1.9.4 You will also need to submit your certificates for successful completion of the online Level 1 Safeguarding Training and PREVENT Training by the start of each academic year.

**All of the above should be taken equally seriously as potential threats to a student's safety.**

## **2. Your Responsibilities as a Member of Staff:**

2.1 You **must** take action if you become aware of any 'emerging concerns' or you have good reason to believe that a student is in danger of harm or 'significant harm'.

2.2 This is a legal obligation.

2.3 You must also act if you know that a student has siblings who may be in danger. For the purposes of child protection, young people are classed as children until they reach 18, but this guidance also applies at WMSF for students aged 18 and over.

Raise any safeguarding concerns, no matter how minor via MyConcern. If a student requires immediate support, please take them to the DSL or a Deputy DSL.

### **2.4 Do:**

- All staff at William Morris Sixth Form **must** read the latest version of **Keeping Children Safe in Education (KCSIE)**, including Annex A, this is a statutory requirement
- **Speak to Matt/Muntadher/Binsy/Angela**, privately if you have **any** concerns at all about a student and submit referrals **via MyConcern**.

- Notify the student that you may have to pass on any relevant information.
- Keep an open mind about what you are being told.
- Stay impartial to the information you are being told and do not offer opinions or judgements.
- Make sure that the student is being taken seriously.
- Try to ascertain if there are any younger siblings that may be affected
- Ring Police, Ambulance or other emergency services **immediately** if the situation is acute (level 4).
- Maintain the attitude of 'it could happen here' regarding all potential risks/harm

### **2.5 Do not:**

- Keep information to yourself if you are worried or try to investigate or deal with situations yourself
- Pass on information in an inappropriate place (e.g. the canteen or the kitchen in the staffroom)
- Ever promise a student that you will keep it totally confidential.
- Ask leading questions or make suggestions or assumptions.
- Act in a disgusted, disbelieving or disinterested manner
- Make a judgement that the student is not telling the truth.

**Remember to act quickly as delay may prejudice a young person's welfare.**

**Please also be aware that the duties and responsibilities throughout this document are everyone's responsibility to enact. For example, you should be aware from the compulsory CPD and appendix of this policy about your duties in relation to Online Safety.**

## **3. Making Referrals and Dealing with Disclosures**

### **a)How to Deal with Disclosures**

3.1 We never promise a student that disclosures will be treated as confidential. We also make clear that whilst we will be as discreet as possible and take the views of the young person into account, information may need to be shared with the safeguarding team and/or external agencies. Staff have a duty to share information when there is risk of harm whether that is to a student or siblings under the age of 18.

3.2 During a safeguarding conversation with a student, the member of staff should:

- Allow the student to speak freely
- Remain calm

- Under no circumstances ask investigative questions
- Under no circumstances promise confidentiality
- Not be afraid of silent pauses in the conversation
- Tell the student what will happen next
- Write up the conversation as soon as possible and send it to the Designated Safeguarding Lead via the relevant paperwork
- Always take the student seriously.

3.3 Members of staff should not deal with disclosures in isolation and must always inform the safeguarding team via MyConcern.

3.4 Staff should inform the safeguarding team of any concerns they might have that do not result from disclosures, even if they do not seem to be severe.

3.5 If a situation is deemed urgent or acute, defined by there being an immediate and severe risk to the student's life or physical safety, then the member of staff must try to deal with the situation immediately. This may involve calling the police, social services or health services as appropriate. Advice should be sought if available but staff must act quickly to minimise any risk to the student.

## **b) Recording and Reporting Concerns**

3.6 Concerns may arise from a number of areas and are not limited to disclosures. All staff must report any concerns to the safeguarding team via MyConcern. No member of staff should make a judgement that their observations are not serious enough to warrant a referral.

3.7 All staff have a responsibility to ensure effective records are kept. This is the reason we have one centralised system with MyConcern. Staff must always report concerns as soon as possible.

3.8 Any urgent concerns must also be reported orally and immediately to the DSL (or DDSLs), or action must be taken immediately if they are unavailable. An emergency situation means the safety of the student takes priority. All emergency concerns will then be written up on MyConcern as soon as is practicably possible.

3.9 Guidelines are as follows:



1. All staff must send referrals via **MyConcern** and these will be picked up by the safeguarding team.
2. Written records should be clear, and objective. They must detail observations and facts as closely and in as much detail as possible
3. Written records should not be subjective or emotional and **MUST NOT** contain personal judgements or the member of staff's own conclusions
4. The DSL will record how the referral was handled and what the actions and outcomes were.
5. The DSL will keep a record of any correspondence sent from outside agencies for each student. This will be uploaded to MyConcern.
6. The information will be shared on a "need to know" basis and staff will be reminded of its confidential nature
7. The DSL will keep a record of all referrals for the calendar year, along with outcomes. The DSL will also keep a record of all open cases. This will be available via the MyConcern reporting tool.
8. The DSL and DDSLs will keep a record of all LAC students and the key worker associated with them.

3.9.1 If an emergency situation arises or a Section 47 (see KCSIE flowchart) referral is completed, the DSL will act on the advice of outside agencies about whether or not to inform parents.

3.9.2 As per KCSIE guidelines, the school will try as best as possible to obtain a minimum of two emergency contact details. We regularly check these details to ensure they are still operational and encourage students to be proactive in updating their details.

## **c) The Use of MyConcern as a Reporting and Monitoring Tool**

3.9.3 All referrals will be made to the Safeguarding Team either directly via MyConcern or as a follow-up to a verbal/physical referral when the level of urgency requires this.



3.9.4 New referrals to MyConcern send an automated email to all members of the Safeguarding Team. These act as a prompt to triage the referral. MyConcern is also manually checked on a regular basis to ensure that all concerns are triaged.

3.9.5 The DSL or Deputy DSL that triages the referral will decide whether immediate action is required or and/or complete or assign tasks as necessary.

3.9.6 The DSL will categorise the concern which moves it from the 'new' to the 'open' dashboard. It will remain here until any actions are complete and then be filed. Once it is filed, it will remain on the student's profile and be used for information sharing and to inform future safeguarding decisions.

3.9.7 Students files will remain open throughout their time at WMSF and be archived when they leave. It will still be available for 5 years which will allow us to provide information to approved external agencies for legitimate reasons upon request.

## **d) Student Referrals**

3.9.8 Students can speak to any member of staff if they have concerns related to safeguarding about themselves, other students or younger siblings for example.

3.9.9 Students can also make referrals via email to [concern@wmsf.ac.uk](mailto:concern@wmsf.ac.uk) These emails are forwarded to the DSL in real time and would be uploaded to MyConcern in the normal manner.

3.9.9.1 Students are informed about this at induction and the information is also on the back of their ID cards.

## **e) Students Above the Age of 18**

3.9.9.2 WMSF is a 16-19 institution and we are fully committed to the safeguarding of all of our students. It is important to note, however, that there are some key differences in actions taken for 16-17-year-old students and those who are 18 and over.

3.9.9.3 Students with EHCPs may be treated as a child up until the age of 25, and the advice in the rest of the policy should be followed for these students. You should always be aware of any *younger siblings* these issues might affect.

- Support via Children's Services is usually unavailable. Referrals to other agencies may still be made (e.g. NHS, police) but these would require the consent of the student.
- Records do not need to be kept, except for referrals to outside agencies which will be logged.
- Notifying parents of any conversations is at the discretion of the member of staff and should always be discussed directly with the student.
- Referrals to Adult Social Services can be made and may be appropriate in certain circumstances.
- Certain legislation regarding "children" will not apply, or may apply differently, but you should bear in mind that criminal activity is still a crime and should be treated as such.
- Advice regarding emergency situations still applies and you should do everything you can to keep the student safe
- Early help is still available for 18-19 year old students although it is likely to be in a different form
- Instances of student-on-student abuse should always keep the age of the victim and alleged perpetrator in mind

3.9.9.4 None of this should assume that the safeguarding of our 18-19 year old students is less important and staff should be fully committed to helping keep all of our students safe.

## **f) Further Information on Referrals**

### **i) Early Help (Level 2)**

3.9.9.5 All staff have a responsibility to provide a safe environment in which students can learn and all staff should be prepared to identify students who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a student's life.

3.9.9.6 Early Help services can be accessed within the school, and these include:

- Counselling (primarily acute need - dependent on current availability)
- MIND

- Dedicated support from a member of the Safeguarding Team.
- Mentoring (Behaviour & Attitudes Lead)
- Tutor mentoring
- Student Services Support
- Referral to other external agencies/charities via our Student Services staff

3.9.9.7 Early Help is also provided by external agencies such as social services in the borough that the student resides in. Where necessary, a referral will be made by a member of the safeguarding team. For students who reside within the borough, Early Help can be accessed via Hammersmith and Fulham front door services - 0208 753 6600 (or the professional's line - 0208 753 6610). Other boroughs have different systems which can be accessed online. Staff should be aware that the offer depends on where the student resides, not where they attend school. These referrals will normally go through the DSL, but any member of staff can make a referral.

3.9.9.8 Any student may benefit from early help, but all Sixth Form staff should be particularly alert to the potential need for early help for a student who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child
- is misusing drugs or alcohol themselves
- has a health condition
- has mental health needs
- has a family member in prison or is affected by parental offending
- is at risk of honour-based abuse (e.g. FGM or forced marriage)
- is persistently absent from school, including persistent absences for part of the day
- identifies as LGBTQ+

## **ii) At Risk and Urgent/Acute (Level 3 and 4)**

3.9.9.9 Hammersmith and Fulham operate a front door referral system to family services, to which any safeguarding concerns should be referred. It is WMSF policy that the DSL will manage referrals, but any member of staff can make a referral. To do so, the number to call is 0208 753 6600 or the professional line on 0208 753 6610. Out of hours, the number is 0208 748 8588. You should inform the DSL as soon as possible if you make a referral.

3.9.9.9.1 It is worth noting, however, that a significant majority of our students reside in other London boroughs, each with their own system. Therefore, it is best practice to consult the DSL wherever possible before a non-urgent referral is made.

3.9.9.9.2 In urgent situations where there is a significant risk to the young person, the staff member should contact the DSL or DDSL **immediately**, or failing that, dial 999 **themselves**, or find the number for the duty social worker in the student's borough of residence.

3.9.9.9.3 Education is a relevant agency in the safeguarding of our students and supports the three safeguarding partners: the local Chief of Police, the Clinical Commissioning Group, and the Local Authority. Local arrangements can be found at [www.rbkc.gov.uk/lscb](http://www.rbkc.gov.uk/lscb).

## **4. Risk Factors**

### **a) General Risk Factors Identified in KCSIE**

4.1 Each of these categories is named and defined as a risk by KCSIE guidance (see page numbers which refer to Keeping Children Safe in Education).

4.2 Any issues arising from any of these risks should be referred via MyConcern to the safeguarding team.

Child abduction and community safety incidents (pg. 142)

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)  
(pg. 142)

County lines (pg. 143)  
Children and the court system (pg. 144)  
Children missing from education (pg. 144)  
Children with family members in prison (pg. 145)  
Cybercrime (pg. 145)  
Domestic abuse (pg. 146)  
Homelessness (pg. 148)  
Mental health (pg. 148)  
Modern Slavery and the National Referral Mechanism (pg. 149)  
Preventing radicalisation (pg. 149)  
The Prevent duty (pg. 150) and Channel (pg. 151)  
Sexual violence and sexual harassment between children in schools and colleges (pg. 152)  
Serious Violence (pg. 152)  
So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage) (pg. 154)  
FGM (pg. 154) and FGM mandatory reporting duty for teachers (pg. 154)  
Forced marriage (pg. 155)  
Additional advice and support 156 142

## **b) Local and Sector-Specific SG Information**

4.3 Students reside in a wide range of boroughs across London, which all have slightly different priorities. Our local priorities have been identified by the LADO as:

- Child exploitation - criminal
- Child exploitation - sexual
- Knife crime

4.4 Concerns particularly pertinent to WMSF and other 16-19 providers are:

- Online risks including prevention from harm, cyber-bullying and grooming
- Abuse within relationships
- Mental health
- Housing and homelessness
- Domestic abuse
- Bereavement

4.5 Students have also cited mental health as a key concern and also the dangers present within the local area including drug-dealing and gangs. WMSF has worked extensively with Mental Health support charities and the local police including the Safer Schools Team ([Gemma.Taylor@met.police.uk](mailto:Gemma.Taylor@met.police.uk)) in response to these concerns.

### **c) Additional Risks**

Bereavement- a number of students suffer bereavement, which may lead to changes in family support networks and mental health.

Care leavers- students living independently or semi-independently or who have previously been in care can present with additional needs.

Child Abduction- when students are taken from their parents or carers without permission. It can be committed by parents or other family members, by people known but not related to the student, and by strangers.

Children being taken abroad for punishment

Children with SEND- staff need to be mindful of the additional potential dangers faced by these students and should also report any concerns to **Angela Wright (SENDCO)** as well as the safeguarding team. Young people with SEND may be especially vulnerable to risk and staff are expected to take extra care to interpret correctly apparent signs of abuse or neglect. The Designated Lead will work with the SEN/DCO to identify students with particular communication needs and to ensure clear guidance is available for staff in relation to their responsibilities when working with young people with SEN. Do not attempt to speak to them using language that they cannot understand. Let them explain any concern to you, whilst you make notes and try to write verbatim: what they have said, where they were - get them to be as descriptive as possible. Inform their keyworker and/or parent that they have had a difficult day (do not repeat the disclosure unless this has been agreed with the safeguarding team).

COVID-19- WMSF recognises the continued impact that COVID restrictions and the impact it has had on our ability to safeguard our students effectively. We continue to monitor developments and government advice closely.

Crime- When students are involved in any type of criminal activity, it is crucial that they are taken seriously, supported and kept safe. Staff must never dismiss the safeguarding concerns that arise from being drawn into criminal activity.

Cybercrime- criminal activity using computers and/or the internet. It includes hacking, denial of service attacks and creating and using malware such as viruses.

Students that are particularly skilled in computing and technology may be drawn into cybercrime, either deliberately or inadvertently.

Fabricated/Induced Illness- when a parent or carer exaggerates or deliberately causes symptoms of **illness** in the student

FGM (including Breast Flattening)- teachers have a **statutory duty** to report any instances of FGM of which they become aware. This must be reported to the Police and the staff member should seek help from the DSL if appropriate. See *Keeping Children Safe in Education (pg. 154)* for more details.

Forced Marriage is a crime, and any potential or known instances must be reported immediately to the DSL.

Gaslighting- this is a recognised form of abuse meaning to manipulate someone by psychological means into doubting their own sanity.

Looked after Children- the designated teacher co-ordinating support for Looked-after Children is **Binsy Parakkel (Deputy DSL)** who works closely with the rest of the safeguarding team on this. Staff should be mindful of the potential additional needs of these students. The DSL will also ensure that each LAC student has a named external professional to whom concerns can be reported.

Mental Health and self-harm- this is WMSF's most significant issue statistically. Any students presenting with suicidal ideations must be treated as an acute (level 4) case and immediate help must be sought. Any other concerns must be reported to the safeguarding team, including self-harm. See *Mental Health Policy* for more details.

Modern Slavery- this includes human trafficking and slavery, servitude and forced or compulsory labour. There is a national mechanism for reporting instances of modern slavery. Education staff are unable to make a direct referral but any instance of modern slavery needs to be reported to the safeguarding team who will contact the police. See [www.antislavery.org/slavery-today/slavery-uk/](http://www.antislavery.org/slavery-today/slavery-uk/) for more practical information on this.

Online Safety- this refers to risks posed to students when online. We proactively work to reduce the risk of students being exposed to material that poses a threat or could be upsetting and react via online monitoring of individuals and devices.

Private Fostering- this applies to students under the age of 16 (unless they have a registered disability). However, students living with others informally should still be brought to the attention of the DSL.

Substance Misuse- Young people abusing drugs and/or alcohol are at additional risk.

Young Carers- Young carers have additional needs that staff need to be mindful of and try and accommodate these needs.



Young Parents- Young parents have additional needs of which we should be mindful. Ensure you let the DSL know of any young parents.

Youth-Produced Sexual Imagery- All instances of this must be reported to the DSL who will investigate further. Report this even if you are doubtful about whether it counts as YPSI. See *Sexting Guidelines* for more information on this.

Note that specific concerns can overlap and students can be at risk of multiple concerns simultaneously.

## **5. Contextual Safeguarding/Extra-familial abuse**

5.1 Contextual Safeguarding is an approach to understanding, and responding to, students' experiences of significant harm beyond their families. It recognises that the different relationships that students form in their neighbourhoods, schools, and online can feature violence and abuse. Parents and carers have little influence over these contexts, and students' experience of extra-familial abuse can undermine parent-child relationships. Therefore, social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts and recognise that assessment of, and intervention with, these spaces is a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that students are vulnerable to abuse in a range of social contexts. Contextual safeguarding risks include sexual abuse and county lines.

## **6. Preventative Education & Awareness**

6.1 WMSF recognises it has a proactive and preventative role to play in making students aware of potential risks. Staff at the sixth form with appropriate responsibilities must ensure that:

- Empower 6 programmes for all students proactively include safeguarding issues and how to stay safe as one of their key focal points
- Students are made aware of internal and external means of support and these are publicised clearly around the Sixth Form. This includes Student Services, the Safeguarding Team, external agencies, and the [concern@wmsf.ac.uk](mailto:concern@wmsf.ac.uk) email address, to allow students to relay their concerns in writing

- Students are given opportunities for discussing concerns and accessing support and are given a clear “student voice” in relation to safeguarding
- Students feel safe and comfortable when discussing concerns and accessing support
- Students are clear about how to report student-on-student abuse and that they can approach any member of staff about this and will be taken seriously
- Staff provide ‘trigger-warnings’ about potentially difficult content in lessons via Curriculum Maps and/or prior to and during lessons.
- Staff proactively consider online safety when planning lessons and independent work to minimise the risk of students being exposed to unsuitable material.
- Online monitoring of internet use on both a device and user basis allows us to react to online activity that suggests there is a risk to a student/s.

## **7) Roles and Responsibilities**

### **a) The role of the DSL and the Deputy DSL**

7.1 This is laid out in detail in Appendix C of Keeping Children Safe in Education.

The DSL is **Matt Jenkins (Assistant Principal for Safeguarding, Welfare & Behaviour)**

### **b) The Role of the Deputy DSLs**

7.2 WMSF has named deputies who support the DSL and to whom staff can refer should the DSL be unavailable. The Deputy DSLs are **Binsy Parakkal, Muntadher Taqi, and Angela Wright**. The Deputy DSLs can also fulfil any of the duties of the DSL with mutually agreed delegation. They are trained to the same level as the DSL.

### **c) The Role of the Principal in Relation to SG**

7.3 The Principal (Mary Berrisford) is responsible for scrutinising the work of the DSL and the deputy DSLs and must be kept informed of any serious cases, especially investigations under Section 47 of the Children's Act, any police referrals and any emergency hospital admissions. The Principal is responsible for ensuring safeguarding is prioritised appropriately throughout the organisation.

## **d) The Role of the Governing Body**

7.4 The governing body should scrutinise the work of the school, in particular the DSL and the Principal, in relation to keeping students safe.

7.5 The named Safeguarding Governor is Lucy Richardson. Named governors should seek to visit the school at least once a term, and ensure the following are in place:

- A robust safeguarding policy that protects all students
- Robust record-keeping arrangements (governors will not be expected to see confidential files but should ensure these are in place)
- Evidence that the safeguarding policy is being enacted in the day-to-day running of the institution
- The SCR is up to date and all necessary checks have been put in place

7.6 The last review took place in June 2023. Recommendations can be found in their report to the governing body.

## **e) The Role of the Online Safety Officer**

7.7 The Online Safety Monitoring Officer Thomas Tesfa-Michael, is responsible for **monitoring** reports received via Webscreen (LGfL) and deciding whether they need to be investigated by the Safeguarding Team on a daily basis. Where further investigation or action is deemed necessary, they will follow the normal procedures of submitting a referral via MyConcern and/or speaking to the DSL/DeputyDSL where urgent intervention is necessary. In addition to the basic safeguarding training that all staff receive, they will receive additional online safeguarding training relevant to their role and ongoing support and guidance from the DSL.

7.8 They will also conduct half-termly checks on our **filtering** system provided by London Grid for Learning (LGfL) to ensure that it is operational and working effectively.

7.9 They will work with the DSL on a strategic level to ensure that our filtering parameters do not 'over-block' but are sufficient for our purposes and context.

## **8. Allegations Against Staff Members**

8.1 Every member of staff should ensure that they are aware of their professional responsibility when working with students, including ensuring that students are safe and free from harm in all scenarios. Therefore it is essential that staff act appropriately when working with students and follow the clear advice and guidance in our *Staff Code of Conduct*.

8.2 Staff in contact with students may be the subject of allegations of abuse. These procedures are intended first and foremost to ensure that students are protected since there have been instances nationally of abusers seeking work with young people. For the benefit of the staff member and the student, these procedures are also intended to ensure that a thorough and objective investigation is carried out. Our response reflects the principle that a student's allegation of abuse will be taken seriously. *Working Together Under the Children Act 1989* states that the child protection investigation must be carried out in the same way as it would be if the allegation were made against a family member.

8.3 Students may make allegations of abuse against members of staff for reasons other than that they have been abused by them. This most commonly occurs when they wish to draw attention to abuse or distress experienced elsewhere, either inside or outside the home, and therefore allegations must always be taken seriously.

8.4 All allegations against staff and volunteers must be reported via our Confide platform. The Principal has overall responsibility for all staff concerns and will work with the DSL if there are concerns that relate to the safeguarding of our students. This platform will be monitored by the DSL and used in the same way as MyConcern as outlined in Section 3 Part C of this policy.

8.5 The Principal will make an immediate decision about whether the information can be dealt with in-house, should be treated as a complaint, or should be referred to the Local Authority Designated Officer (LADO).

8.6 If it appears that an allegation meets the Child Protection criteria, the Principal should not instigate any type of investigation, which might leave the school open to

accusations of pressurising staff and/or students, but must record details of the allegation and refer to the LADO.

8.7 Allegations against the Principal should be reported to the Chair of Governors and advice sought immediately from the LADO. The chair of governors can be contacted through the Clerk to the governors. The contact details for the LADO are as follows:

Email LADO Referrals: [LADO@lbhf.gov.uk](mailto:LADO@lbhf.gov.uk) (monitored Mon to Fri, 9am to 5pm)

Telephone: duty admin: 020 8753 5125 (answered Mon to Fri, 9am to 5pm)

## **9. Whistleblowing**

9.1 Should a member of staff realise or suspect malpractice is taking place and a member of staff is acting in an inappropriate and unprofessional manner, they should refer to our Confidential Reporting Procedures Policy. This is commonly known as “whistle-blowing.”

## **10. Communicating Policy to Parents and Students**

10.1 Students and their parents/guardians are to be informed that we have a child protection policy and that we are required to follow the borough's guidelines for reporting suspected abuse to the Children's Services Department.

10.2 Students and their parents/guardians are able to access our CP policy via our website and they can share concerns (email [concern@wmsf.ac.uk](mailto:concern@wmsf.ac.uk)). They should be made aware of local or national telephone helplines. Details of this will be made upon request through our website.

## **11. Further Information and Links to Relevant WMSF Policies**

**For further information, please consult the following documents:**

**a) INTERNAL POLICIES/DOCUMENTS**

WMSF Attendance Policy

WMSF Anti-Bullying Policy

WMSF Behaviour Policy

WMSF Confidential Reporting Procedures (Whistleblowing) Policy

WMSF Mental Health (Students) Policy

WMSF Prevent Response

WMSF SEND Policy

WMSF Sex & Relationships Education Policy

WMSF Staff Code of Conduct

WMSF Supporting Students with Medical Needs Policy

WMSF Safeguarding Appendices (below)

**b) EXTERNAL SOURCES**

Prevent Statutory Guidance

Keeping Children Safe in Education:

Part One - Part one: Safeguarding information for all staff (pg. 6)

Part two: The management of safeguarding (pg. 23)

Part three: Safer recruitment (pg. 51)

Part four: Allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors (pg. 87)

Part five: Child-on-child sexual violence and sexual harassment (pg. 105)

Annex A: Safeguarding information for school and college staff (pg. 136)

Annex B: Further information [including links for support] (pg. 141)

Annex C: Role of the designated safeguarding lead (pg. 164)

Annex D: Host families - homestay during exchange visits (pg. 171)

Annex E: Statutory guidance - Regulated activity (children) - Supervision of activity with children which is regulated activity when unsupervised (pg. 174)

Annex F: Table of substantive changes from September 2022 (pg. 177)

Working Together to Safeguard Children (2018)

The Children Act 1989

The Children Act 2004

Children and Social Work Act 2017

The Education Act 1996

The Education Act 2002

Education and Skills Act 2008

The Safeguarding Vulnerable Groups Act 2006

The Equality Act 2010

The Children and Families Act 2014

Human Rights Act 1998

Children and Young Persons Act 2008

Sexual Offences Act 2003

Voyeurism (Offences) Act 2019

Counter-Terrorism and Security Act 2015



Serious Crime Act 2015

## 12. Appendices

### a) “Sexting”- Youth-Produced Sexual Imagery

12.1 These guidelines are based on government advice regarding youth produced sexual imagery, which is more commonly referred to as “sexting”. Note that this section refers to “children” for clarity’s sake as the laws are specific to children under the age of 18. This advice covers:

- Person under 18 creates a sexual image of themselves and shares it with another person under 18.
- A person under 18s shares an image of another under 18 with another person under 18 or an adult.
- A person under 18 is in possession of sexual imagery created by another person under 18

12.2 Not covered by this advice:

- Under 18s sharing adult pornography (though this could potentially be a safeguarding issue).
- Under 18s sharing sexual texts without sexual imagery (though this could potentially be a safeguarding issue).
- Adults sharing sexual imagery of under 18s. (This is child sexual abuse and must always be reported to police, including cases where students over 18 at WMSF share these images)

12.3 Any sharing or creation of YPSI is a safeguarding concern and must be reported to the DSL. It is up to the DSL to ascertain whether the police should be involved in any subsequent investigation.

12.4 Do not view the image yourself if it is at all avoidable. If after a discussion with an LG member or the DSL, it is deemed unavoidable, ensure you view the image with a member of staff present. **Under no circumstances should you copy, print or share the image as this is a crime.**

12.5 The DSL will assess whether police involvement is necessary. The following indicate police involvement is mandatory:

- The image involves a child under 13 and depicts sexual acts
- Violent acts, or those not in line with a child's developmental stage or age, are depicted
- An adult is involved
- There is a risk of coercion, grooming or blackmail
- There is doubt about the child's ability to consent (e.g. SEN)
- The child is at risk of suicide, self-harm or other immediate harm as a result of the disclosure

12.6 Police involvement will also be undertaken regarding sharing the image if this is **aggravated**. This always includes incidents involving adults; the two youth-only definitions of this are:

- Intent to harm, e.g. sharing the image to exact revenge, sharing relating to blackmail, or the sexual abuse of the young person by the young person sharing the image
- Reckless misuse e.g. sharing the image without the young person's consent

12.7 Police involvement will not be undertaken if the sharing of the image is **experimental**. This includes:

- Children taking sexual images of themselves for themselves, with no intent to share
- Sharing for "romantic" reasons e.g. children sharing sexual images as a couple, with no intention to share beyond themselves
- Sharing images of oneself for sexual attention seeking.

## **b)Female Genital Mutilation (FGM)**

12.8 Female Genital Mutilation (FGM) is the non-medical partial or total removal of the external female genital organs. This procedure is typically carried out on young girls, although it can happen later. FGM is illegal in the UK and particularly affects girls from Africa. It also includes the process of Breast Flattening.

12.9 Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM on herself. The Female Genital Mutilation Act 2003 tightened this law to criminalise FGM being carried out on UK citizens overseas. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison.

12.9.1 The Serious Crime Act 2015 strengthened further the legislation on FGM and now includes:

- the right to anonymity for victims
- the offence of failing to protect a girl aged under 16 from the risk of FGM
- the provision of Female Genital Mutilation Protection Orders (FGMPO); and
- the duty on professionals (including teachers) to notify police when they discover from disclosure that FGM appears to have been carried out on a girl under 18.

12.9.2 FGM is practised predominantly in North African countries, the Middle East and Asia. Schools should be particularly alert in London and therefore is an issue all staff must be aware of in our setting given the high number of students whose families originate from these regions. Although FGM takes place between birth and around 15 years old; it is believed that the majority of cases happen between the ages of 5 and 8. However, if a student in our 16-19 setting discloses that they have experienced FGM or there are suspicions staff must report this to the Designated Lead and must also inform the police themselves. This is partly because there are likely to be younger siblings who may also be at risk.

12.9.3 The most significant countries for FGM are:

- Burkina Faso
- Djibouti
- Egypt
- Eritrea
- Ethiopia
- Guinea
- Liberia
- Mali

- Mauritania
- Sierra Leone
- Somalia
- Sudan
- The Gambia

#### **12.9.4 Risk Factors include:**

- low level of integration into UK society
- mother or sister who has undergone FGM
- girls who are withdrawn from PSHE
- a visiting female elder from the country of origin
- being taken on a long holiday to the family's country of origin
- talk about a 'special' event or procedure to 'become a woman'

12.9.5 At WMSF we have a duty to report concerns we have about girls at risk of FGM to the police and social services. If a student discloses to a member of staff that they have undergone FGM, the member of staff must also refer the case to the police themselves (the DSL will be on hand to assist with this).

### **c) Abuse - What to look out for:**

12.9.6 It is imperative that all staff are aware of the potential signs and types of abuse, and report any instances of these to the DSL. Remember at all times that abuse can be perpetrated by peers as well as family members and those in the wider community.

#### **i) Forms of Abuse and Neglect**

12.9.7 **Abuse:** 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 by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Physical abuse: a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child

12.9.8 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

12.9.9 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or college's policy and procedures for dealing with it.

12.9.9.1 **Financial abuse:** specific to students age 16 and over, financial abuse can involve the withholding of earnings of a student, the unauthorised use of their property or possessions or the unlawful taking of these, or limiting their opportunities for earning money.

12.9.9.2 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**All staff should be aware that child sexual and child criminal exploitation**

**are forms of child abuse.**

## **ii) Signs of Abuse or Neglect:**

- Students whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping
- Students with clothes which are ill-fitting and/or dirty
- Students with consistently poor hygiene
- Students who make strong efforts to avoid specific family members or friends, without an obvious reason
- Students who don't want to change clothes in front of others or participate in physical activities
- Students who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- Students who talk about being left home alone, with inappropriate carers or with strangers
- Students who reach developmental milestones late, with no medical reason;
- Students who are regularly missing from school or education
- Students who are reluctant to go home after school;
- Students with poor school attendance and punctuality
- Parents who are dismissive and non-responsive to practitioners' concerns
- Parents who collect their children from school when drunk, or under the influence of drugs
- Students who drink alcohol regularly from an early age
- Students who are concerned for younger siblings without explaining why
- Students who talk about running away
- Students who shy away from being touched or flinch at sudden movements.

## **d) Online Safety**

12.9.9.3 This policy has been updated in line with the latest version of Keeping Children Safe in Education (KCSIE). There are 4 categories of risk: **content**, **contact**, **conduct** and **commerce**.

12.9.9.3 Online safety forms part of your school's curriculum primarily within the Empower 6 curriculum which means that all learners have access to it. This considers the types of risk from online **content**. This would also be picked up by teaching staff when asking students to use internet resources for research in lessons to prevent harm. We also consider how to avoid being the victim of somebody attempting to **contact** our students in the online environment and what they can do should that happen. We also look at how to **conduct** yourself online and consider the consequences of sharing/publishing things that a student may later regret or that could get them into trouble in both the short and long-term. We consider the ways in which **commerce** increasingly takes place online and how students can protect themselves from scams, etc. (Please also see section 6 which explains preventative education strategies in more detail).

12.9.9.5 Teaching about safeguarding, including online safety, is adapted for groups in the following ways:

- We offer 'trigger-warnings' about content in advance that may be particularly difficult for all students; particularly considering those who are vulnerable or victims of abuse. A student can then work with their teacher/tutor to find a solution that allows them to access the necessary



content without being unnecessarily exposed to content that could be harmful to them.

- In addition to the above, pupils with the most severe special educational needs and/or disabilities (SEND) receive a more tailored approach to Empower 6 content as Foundation Learning students are in dedicated tutorials. These sessions are delivered by SEND specialists.

12.9.9.6 Please see the section in the SG&CP policy about the role of the Online Safety officer for details of our approach to filtering and monitoring on school devices and school networks. This section also lays out the role and responsibilities of the governing board and the designated safeguarding lead (DSL).

12.9.9.7 Cyber-bullying is included within the Behaviour Policy in terms of how we prevent and manage cases. We include all cyberbullying incidents as part of our remit regardless of where and when the alleged offence/s took place. We also try to reduce the likelihood of a victimisation and advice on how to challenge this within our Empower 6 tutorial sessions.

12.9.9.8 Staff receive training about online safety as part of the compulsory Safeguarding CPD at the start of the year. Regular updates are communicated where necessary via staff briefings and/or emails as appropriate.

12.9.9.9 The Safeguarding Governor will be responsible for monitoring the policy from a board perspective and the DSL is responsible for the application and management of it as outlined in the roles and responsibilities section in the main body of the SG&CP policy.

12.9.9.9.1 Emphasis on Filtering and Monitoring:

As part of their safeguarding and online safety training, staff are informed of their duty to understand their expectations, roles and responsibilities around filtering and monitoring systems (paragraph 14).

We use London Grid for Learning for our online safety needs:

### **Filtering**

This is set and managed by the DSL and the Tech Team at the start of the year and reviewed regularly by them.

### **Monitoring**

This is conducted using LGfL's Webscreen service and monitored by the Online Safety Officer on a daily basis - concerns will be passed on to the SG team using a standard referral in MyConcern.

### **Decryption**

LGfL state in their policies that they are extremely 'safe' in relation to the data they decrypt and share. This ensures that sensitive data is not obtained and that we only get 'headline' reports of issues within the parameters we set.

Teaching Staff Responsibilities around Online Safety:

When teaching content that may expose students to danger online, think about trying to minimise or mitigate these risks:

- Provide them with search terms that are safe where possible.
- Provide trigger warnings in advance and make time for students to speak to you if they have any concerns about the material in the lesson.
- To try to minimise the likelihood of students being picked up by our monitoring systems, please make sure that you email the

Online Safety Officer in advance if there is content that they will be researching for a lesson and it is likely to get flagged.

## **e) Recruitment of New Staff**

12.9.9.2 There are additional policies that show how our recruitment procedures deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities at William Morris. Please see HR for more information.

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