



Westminster Tutors

Westminster Tutors is committed to safeguarding. We adopt a whole school approach that prioritises the safety and welfare of our students.

Safeguarding & Child Protection Policy 2021

Contents

1.	Introduction	2
2.	Aims of Policy	3
3.	Guiding Principles of Safeguarding	4
4.	Contact Details	5
5.	The Designated Safeguarding Lead & Deputy	7
6.	Staff Responsibilities	7
7.	Guidance for Staff	8
8.	Peer on Peer Abuse	14
9.	Appointment of Staff: Safer Recruitment	15
10.	Allegations against Staff	16
11.	Staff Code of Conduct	17
12.	Staff Training	18
13.	Curriculum	19
14.	Children & Young People with Special Educational Needs & Disabilities (SEND)	19
15.	Record Keeping	20
16.	Monitoring Pupils on the Child Protection Register	20
17.	Communicating Policy to Parents & Students	21
18.	Monitoring & Evaluating Effectiveness of Policy	21
19.	Legislation & Guidance	21
	Appendix A: List of Relevant College Policies	23

1. Introduction

Westminster Tutors is a small, independent sixth form college in South Kensington. It is Ofsted Outstanding and one of the most academically successful independent colleges in London, despite being non-selective. Its success is in part due to its highly supportive, bespoke educational provision, with a majority of classes one to one or in small groups. Students are supported inclusively according to their individual needs, with personal tutors, mentors and subject tutors able to adapt to a broad range of abilities and issues. Pastoral responsibilities are taken as seriously as academic achievement, and a history of superb parent, student and staff evaluations clearly indicate a high level of satisfaction with the support and provision on offer.

Safeguarding is one of the core tenets of the Westminster Tutors ethos:

- To provide high quality, tailored and individualised education in a supportive and friendly environment
- To make safeguarding a priority, placing it centrally as part of a whole school approach
- To be genuinely inclusive, adapting to the individual needs of students, and celebrating diversity and difference

The central importance of safeguarding is reflected in the following statement appearing on all key college documents, including policies and staff recruitment notices:

'Westminster Tutors is committed to safeguarding. We adopt a whole school approach that prioritises the safety and welfare of our students.'

Creating a safe learning environment is key to safeguarding, and a focus on safety within the college remains a priority. However, safeguarding should be seen contextually, and schools and colleges have a responsibility to ensure that young people are also safe and protected outside schools, including online. Safeguarding also extends to peer-to-peer interactions, and to mental as well as physical health. The college often enrolls students with a history of mental health issues, as well as those with learning difficulties and neurological differences. The safety and security of vulnerable individuals, including issues arising from poor mental health, is a key priority.

A whole school approach means that this policy forms part of a linked system that extends to every part of college life. Safeguarding is an essential part of the college admissions, recruitment, behaviour and SEND policies (Appendix A).

While the Proprietor and senior staff have special responsibilities for ensuring the safety of students, covered by various legislation including the guidance in Part Two of *Keeping Children Safe in Education 2021* (see 18. Legislation & Guidance), promoting the welfare of children is **everyone's responsibility** and **everyone** who comes into contact with children and families has a role to play.

To this end, the Proprietor and senior college staff are committed to ensuring that all members of the college community are aware of their responsibilities and the relevant procedures. This will include communicating policies and procedures effectively with parents/carers, ensuring all staff attend appropriate training, and working effectively with the local authorities (RBKC and Westminster).

While a 'child' is defined as anyone under the age of 18, the college also admits students who are aged 18 and above (the college is registered to take 14-25 year olds). As young adults, statutory procedures relating to Child Protection do not apply; however, the college's absolute commitment to safeguarding and promoting the welfare of those in its care extends to ALL students at the college, regardless of age. In 2021/22, no students of compulsory school age (CSA) are enrolled. Therefore, this policy will focus on older students, all currently taking or retaking A levels.

2. Aims of Policy

- To make **college staff** aware of the importance of safeguarding and child protection, and in particular to make clear responsibilities for identifying and reporting actual or suspected abuse or neglect.
- To ensure **pupils and parents** are aware that the college makes child protection and safety a priority and to communicate key information.
- To adopt an **inclusive approach**, that stresses the importance of listening to children and young people and making their voices central to decision making.
- To document the **appropriate procedures** for identifying and reporting abuse and for dealing with allegations against staff.
- To promote effective liaison with **local authorities** and other agencies including Early Help services in order to work together for the protection and welfare of all pupils.

- To support **pupils' development** in ways which will foster security, confidence and independence.
- To integrate a child protection and safeguarding **curriculum** within the existing curriculum, allowing for continuity and progress through Key Stage 5.
- To make appropriate **links** and reference to policies in related areas such as behaviour, SEND and anti-bullying.

3. **Guiding Principles of Safeguarding**

The Proprietor and SLT will ensure that the principles identified below, many of which derive from the Children Act 1989, are followed by all staff:

All children have a right to be kept safe and protected from abuse.

Child abuse can occur in all cultures, religions and social classes.

Staff must be sensitive to the family's cultural and social background.

Peer-on-peer abuse, sexual violence and sexual harm can occur.

Mental health, as well as physical health, is central to safeguarding.

Safeguarding is contextual, and may involve relationships outside of the home or college.

Online safety should be a priority, and e-safety policies followed closely.

Children and young people must have the opportunity to express their views and be heard.

If there is a conflict of interests between the child and parent, the interests of the child must be paramount.

The responsibility to initiate agreed procedures rests with the individual who identifies the concern.

All staff must endeavour to work in partnership with those who hold parental responsibility for a child.

Information in the context of a child protection enquiry must be treated as CONFIDENTIAL and only shared with those who need to know.

All staff should have access to appropriate and regular training.

College management must allow staff sufficient time to carry out their duties in relation to child protection and safeguarding.

4. Contact Details

In the event of an emergency, the police should be contacted on 999.

Westminster Tutors Contacts

For any non-emergency concerns about safeguarding, either during college hours or in the evenings, weekends or holidays, please contact:

Joe Mattei, Designated Safeguarding Lead, Principal & SENCO
joe@westminstertutors.co.uk or 020 7584 1288 (college switchboard number)

If Joe is unavailable, please contact:

Virginia Maguire, Deputy Designated Safeguarding Lead, Senior Consultant & Director of Studies
virginia@westminstertutors.co.uk or 020 7584 1288 (college switchboard number)

For concerns about the senior leaders or management of the safeguarding in the college, please contact:

David Game, Proprietor
dgame@davidgame-group.com or 020 7584 1288 (college switchboard number)

Local Authority Contacts

Westminster Tutors is covered by the Kensington & Chelsea and Westminster Bi-Borough Local Safeguarding Child Partnership: <https://www.rbkc.gov.uk/lscp/>

They can be contacted by parents or students resident in the two boroughs, or for general enquiries or questions about safeguarding at the college:

Kensington and Chelsea Duty Line

Duty Line – 020 7361 3013
socialservices@rbkc.gov.uk

Westminster Duty Line

Duty Line: 020 7641 4000
Out of hours (Emergency Duty Team): 020 7641 2388
accesstochildrensservices@westminster.gov.uk

If a student is not resident in a local London borough the following government website (which searches by postcode) finds the appropriate local authority contact number:

<https://www.gov.uk/report-child-abuse-to-local-council>

Local Authority Designated Officer (LADO)

In order to manage allegations against professionals, every Local Authority appoints a Local Authority Designated Officer (LADO). The LADO works within Children's Services and should be alerted to all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against children, or related to a child, or
- behaved towards a child or children in a way that indicates s/he may pose a risk to children. (Working Together 2015)

To contact the LADO:

Kensington and Chelsea

Please call 020 7361 3013 and ask to speak to the Duty Child Protection Adviser
Email kclado.enquiries@rbkc.gov.uk

Westminster

Please call 020 7641 7668 and ask to speak to the Duty Child Protection Adviser
Email lado@westminster.gov.uk

5. The Designated Safeguarding Lead (DSL) & Deputy (DDSL)

See **Annex C** of Keeping Children Safe in Education (KCSIE 2021).

The Proprietor will ensure that the college has identified a Designated Safeguarding Lead for child protection. The Designated Safeguarding Lead has the following responsibilities:

- To ensure all staff are familiar with college and Bi-borough (RBKC and Westminster) procedures and guidelines for identifying and reporting abuse, including allegations of abuse against staff
- To ensure all staff receive training in the above, including staff who are temporary or start mid-year (12. Staff Training & Support)
- To be responsible for coordinating action and liaising with college staff and support services over child protection issues
- To be aware of all children within the college who are the subject of a Child Protection Plan or who are Looked After Children and ensure the child's social worker is informed if any such child is subject to an exclusion from the college
- To ensure the college is represented at child protection case conferences, Core Group Meetings, Early Help and Child In Need Meetings and that written reports are provided as required
- To follow as appropriate recommendations made by Local Safeguarding Children Board (LSCB)
- To be aware of new legislation, guidance, policy and procedures in the area of Safeguarding and Child protection
- To support and advise staff on child protection issues generally
- To disseminate relevant information between agencies to the appropriate staff e.g. to learning mentors
- To maintain accurate and secure child protection records and send on to new colleges (where relevant).

Should the Designated Safeguarding Lead not be available, then their duties and responsibilities will be carried by the Deputy Designated Safeguarding Lead (DDSL).

6. Staff Responsibilities

All college staff have a responsibility to identify and report suspected abuse and to ensure the safety and wellbeing of the pupils in the college. In doing so they should

seek advice and support as necessary from the DSL, Deputy DSL and other senior staff members.

Staff are expected to provide a safe and caring environment in which children can develop the confidence to voice ideas, feelings and opinions. Children should be treated with respect within a framework of agreed and understood behaviour as set out in the college *Code of Conduct and Behaviour Policy*.

All college staff should:

- Receive appropriate training (see section 12);
- Be able to identify signs and symptoms of abuse, including specific safeguarding issues outlined in the statutory guidance *Keeping Children Safe in Education* (DfE September 2021), specifically Part 1 and Annex A, or any subsequent updates.
- Report concerns, including concerns about other staff/professionals, to the DSL, Deputy DSL or other senior staff members as appropriate;
- Be aware of the local early help process and understand their role in it;
- Be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments;
- Monitor and report as required on the welfare, attendance and progress of all pupils;
- Keep clear, dated, factual and confidential records of child protection concerns;
- Respond appropriately to disclosures from children and young people (see guidance below).

7. Guidance for Staff

Please refer to the following for more detailed guidance: (19. Legislation & Guidance)

- ***Keeping Children Safe in Education (DfE, 2021)***: Part One must be read by all teaching staff; Annex A is a summary of Part One for staff not in contact with children.
- ***'What to do if you're worried a child is being abused: advice for practitioners'*** HM Government (2015)

The following guidance has been selected and edited for the purposes of this policy, and should be read alongside the original guidance, for instance in Part One of KCSIE 2021.

All college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Key Definitions

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 in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Emotional 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact,

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

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

Other Definitions

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): both are forms of abuse where an individual or group take advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Female Genital Mutilation (FGM): If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. This is a specific legal duty on teachers.

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

How to Spot Signs of Abuse or Neglect

It can be difficult to spot when children are being abused or neglected. The following are useful indicators:

‘Externalising behaviour’: aggressive, challenging or disruptive

‘Internalising behaviour’: low mood, self-esteem, self-blame or self-hatred

Difficulty sleeping

Poor hygiene or dirty clothes

Making strong efforts to avoid specific family members or friends, without an obvious reason

Not wanting to change clothes in front of others or participate in physical activities

Problems such as a sudden lack of concentration and learning or they appear to be tired or hungry in class

Talking about being left home alone, with inappropriate carers or with strangers

Reaching developmental milestones late, such as learning to speak or walk, with no medical reason

Poor attendance and punctuality

Being reluctant to go home after school

Parents being dismissive and non-responsive to practitioners’ concerns

Being concerned for younger siblings without explaining why

Talking about running away

Consensual and non-consensual sharing of nude and semi-nude images and/or videos

Shying away from being touched or flinching at sudden movements

What to do if you have concerns

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

If staff have any concerns about a child's welfare, they should act on them **immediately**.

The safeguarding of children and protecting them from harm is a highly sensitive issue and anyone involved must be careful that they follow the correct procedure as outlined below. In the event that you are concerned about a child's welfare, as their teacher you may approach them directly and gently enquire about their well-being, but you should not ask leading or direct questions about abuse or neglect.

Disclosures: What should you do if a child wants to talk with you?

- Make time to listen to them. Do not make excuses or say you are busy.
- Find somewhere private if you are in a public space or room.
- Let them talk in their own way at their own pace.
- Limit any questioning to the minimum necessary to seek clarification only, strictly avoiding 'leading' the student by making suggestions or asking questions that introduce your own ideas about what may have happened. This is essential as a possible victim of child abuse may only be interviewed once, and this interview should be conducted by an expert police officer to gain evidence.
- It can be a good idea to make basic notes while the student is talking, informing them that you are going to do so e.g. 'I'm going to write a few notes, is that ok?'. However, if making notes, staff should be conscious of the

need to remain engaged with the child and not appear distracted by the note taking.

- Be gentle and open: listen very carefully and accept what you are told.
- Do not react in any way to what you are being told or show any disgust or disapproval.
- Reassure the child that in telling you something important they have not done anything wrong.
- You should not promise to keep whatever is being divulged confidential, but do reassure the child that only those people who need to know will be informed. Your role is to listen, ask very basic questions, but not to interrogate the child.
- Wait for as long as the child needs to complete the disclosure - under no circumstances interrupt the disclosure e.g. for another lesson or because you have to leave. Allow for pauses and be patient - key information may not be revealed until the end.
- After the disclosure, ask the child or young person to remain on site, either in the room of disclosure or in reception, and immediately inform the DSL or Deputy. They will interrupt whatever they are doing, and have a short interview with you. They will then speak to the student, possibly with you present.
- If you have serious concerns about the student's mental health, do not leave them alone but call reception on 020 7584 1288 and ask to speak to the DSL or Deputy.
- After the meeting the DSL/Deputy will ask you to make more comprehensive notes of what both you and the child said in written form. Please do this immediately, while it is fresh in your mind, and make it as verbatim and factual as possible. Submit the report to the DSL/Deputy before you leave. Either then or subsequently they will inform you of how the disclosure is being followed up, subject to confidentiality.

What happens next?

When there has been a report of sexual violence, the Designated Safeguarding Lead (or a Deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

If the matter is to be taken further, the DSL/Deputy DSL has a duty of care to inform the local social services in the local authority that the student is resident in and/or the police and allow them to assess the situation and decide an appropriate course of action.

Where there are 'low level' concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the DSL should discuss these with the student's local authority child protection advisors as the child may benefit from Early Help.

If a member of staff reports an allegation or suspicion of abuse in accordance with this policy, but believes that the report has not been acted upon appropriately, then he or she should draw the matter again to the attention of the DSL/Deputy. Alternatively, the staff member may report the matter directly to the relevant local authority of the student and should advise the DSL that this action has been taken. On making a referral to any social worker, you should receive a response within 24 hours. If the DSL/Deputy/member of staff believes the local authority has not taken sufficient action s/he has a responsibility to be proactive and urge again that action is taken.

8. Peer on Peer Abuse (child on child)

The following is based on **Part Five** of Keeping Children Safe in Education (KCSIE 2021).

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. If staff have any concerns regarding peer on peer abuse they should speak to the Designated Safeguarding Lead (or Deputy).

Staff should understand the importance of challenging inappropriate behaviour between peers, and not downplay behaviours such as sexual harassment as 'part of growing up', 'banter' or 'just having a laugh'. The college maintains a zero tolerance policy on any such behaviour, and takes its culture and ethos of tolerance and inclusivity extremely seriously.

If staff have any concerns about a child's welfare in relation to peer-on-peer abuse the same reporting procedures set out in Section 6 above, Guidance for Staff, should be followed.

9. **Appointment of Staff: Safer Recruitment**

The following is based on **Part Three** of Keeping Children Safe in Education (KCSIE 2021).

When appointing staff, the Proprietor and Principal will adhere to all statutory Safer Recruitment procedures, as set out in Keeping Children Safe in Education (DfE, September 2021) or any subsequent/ additional guidance.

Safer Recruitment Safeguards

- Documentation sent out to potential candidates will make it clear that child protection is a high priority of the college and that rigorous checks will be made of any candidate before appointments are confirmed.
- A minimum of two references will be taken up; professional rather than personal email addresses are required.
- A reference will always be obtained from the last employer; references will be in writing.
- At least one member of staff on the recruitment panel will have received Safer Recruitment training. The Principal/DSL has received this training and is involved in the recruitment and appointment of all new members of staff.
- At interview candidates will be asked to account for any gaps in their career/employment history; they will also be asked a number of mandatory safeguarding questions.
- Candidates will be made aware that all staff are subject to enhanced DBS checks.
- For teachers with PGCEs/QTS there is an additional check on whether the applicant has been prohibited from teaching by the Secretary of State
- Identity checks will also be carried out, including passport, proof of address, that they are entitled to work in the UK and certificates of all relevant qualifications.

- A candidate's medical fitness to work as a teacher or in a capacity which involves access to/ responsibility for children and young people will be checked at the stage of appointment.
- Keeping Children Safe In Education (2018) brought in an additional Section 128 check (whether a person has been prohibited from the management of a school) that is required not only for the Proprietor but also for senior management positions, which will include the Principal, the Senior Consultant and Director of Studies and the Registrar. An enhanced DBS check including a Section 128 check will show whether or not an individual has been barred from management in an educational setting.
- Evidence of relevant checks will be recorded and stored electronically in a secure section of the college records.
- The college will maintain an accurate Single Central Record for all staff and adults in the college.

10. **Safeguarding concerns about another staff member**

The following is based on **Part Four** of Keeping Children Safe in Education (KCSIE 2021).

Please see section 4 for contact details.

As an employer, the college has a duty both to safeguard children attending the school, and to deal quickly and fairly with all staff (whether teachers, other members of staff or volunteers) if an allegation of abuse is made against them. The Principal/DSL is responsible for implementing and following procedures as set out in current statutory guidance so that the College's duty of care to both students and employees is fulfilled.

If you have concerns about any member of staff, immediately inform the Principal/DSL, or Senior Consultant/Deputy DSL should he not be available. The Principal will then contact the LADO (Local Authority Designated Officer).

Alternatively, where staff feel unable to raise an issue with their employer or feel that their genuine safeguarding concerns are not being addressed, an NSPCC whistleblowing advice line is available. Staff can call 08000 280285 – 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk. Alternatively, staff can write to:

National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

If an allegation is made about the Principal, the Proprietor should be informed and the LADO should be notified by the Proprietor/ Deputy DSL/ the individual member of staff.

Where the DSL has concerns about the role of the Proprietor, or where there are circumstances where there may be allegations against the owner or those who are close to him, the DSL should bypass in-college systems and deal directly with the local authority LADO. This enables separation between the Proprietor and the DSL. The DSL should also be able to gain access to an educational lawyer should s/he feel this additional support is necessary, with this being funded by the college.

11. Staff Code of Conduct

In order to minimise the risk of accusations being made against staff as a result of their daily contact with students, all college staff should familiarise themselves with the college's expectations regarding professional conduct.

The college has introduced a staff **Code of Conduct**, to be published in October 2021. It is based on the previous code of conduct: **Guidance for safer working practice for those working with children and young people in education settings (updated May 2019)** and the **Teachers' Standards 2012 (update June 2013 and September 2021)**. A modified form has formed part of the staff inductions since August 2021. All staff will be required to sign a declaration stating that they agree to the principles and policies laid out in the code. Staff members will be invited to meet and discuss any issues or concerns about the requirements of the new policy with the Principal.

The code will set out in detail the college approach towards behaviour, and should be read alongside the college **Behaviour Policy**, which will set out an amended student **Code of Conduct**.

The Use of Reasonable Force

The use of control and physical restraint is a last resort and should only be considered in exceptional circumstances to keep the young person safe and/or those around

them safe. No member of staff at Westminster Tutors has training in physical restraint and for this reason the college does not admit students with behavioural or emotional difficulties that may lead to any actions which require physical restraint. The college also gives due regard to KCSIE 2021, which emphasizes that an individualised plan should help minimise the risk of challenging behaviour and the use of physical restraint to de-escalate a situation.

Since September 2008 no teacher or other staff member has had occasion to use control or physical restraint at Westminster Tutors, but if a critical situation does ever arise a record will be made, with a full report being made to the Principal/ DSL and the parents will be informed.

12. Staff Training

Senior Leaders & Proprietor

The DSL and Deputy DSL will both complete and receive regular level 3 refresher training. They will also stay updated on amendments to government policy and guidance through online refresher courses, Bi-borough LSCP training, NASCAR emails, CIFE training, and other relevant sources.

The proprietor will have current level 2 safeguarding training.

All Staff

All staff should receive:

- Appropriate safeguarding training at induction, including:
 - The college Safeguarding and Child Protection Policy
 - The college Behaviour Policy
 - The Staff Code of Conduct
 - The role of the DSL and Deputy
 - The safeguarding response to children who go missing from education
 - KCSIE (Part One for all staff in contact with children, and either Part One or Annex A for other staff)
- Updates on relevant amendments to policies and guidance
- Annual refresher training as part of the staff meetings, focussing on amendments to KCSIE 2021 and other relevant guidance
- Annual certificated level one refresher training for all staff in contact with children.

The college accepts certificates or evidence of training received through other schools or providers.

The evidence of all training will both be kept in staff files and recorded on a central Compliance spreadsheet.

13. Curriculum

See Curriculum Policy 2021

The college curriculum policy reflects the whole school approach to safeguarding, and the interlinked importance of developing students' self-esteem, confidence, communication skills and self-awareness. Therefore, this policy should be read alongside other policies such as PSHCE, SMSC and RSHE among others (see Appendix A).

In particular, in 2021/22 the college will emphasise the importance of online safety, and a healthy and safe approach to social media and internet use.

14. Children & Young People with Special Educational Needs & Disabilities (SEND)

See SEND Policy

The Proprietor, Principal/DSL (also the college SENCO), and Deputy DSL recognise that children with special educational needs may be especially vulnerable to abuse or neglect. In turn, all staff need to be careful not to assume that possible signs of abuse or neglect are simply part of the student's SEN or disabilities. Specifically, all staff should be alert to the following:

- Behaviour, mood and injury may relate to possible abuse
- Students with SEND have a higher risk of peer group isolation
- Bullying can have a disproportionate impact
- Students with SEND may have difficulties with communication
- Schools should consider extra pastoral support for children with SEND

The DSL/SENCO and Deputy DSL will identify pupils with particular communication needs, including autistic students, and be alert to the fact they might be less able to

evaluate appropriate adult behaviour or articulate their concerns. As a matter of general practice, students with SEND and particularly autistic students have greater access to mentoring and support at Westminster Tutors and all staff are encouraged to alert students' Personal Tutors if they believe a student needs additional pastoral support.

In addition, any student who has a disability as defined by the Equality Act 2010 or who has an EHCP should be regarded as a potentially vulnerable young adult, and our duty of care therefore extends to students aged 18 and above. In situations where concerns about abuse may arise or the student makes a disclosure, the same internal reporting procedure should be followed by staff members and the adult social services team in the local authority where the student resides should be contacted by the DSL.

15. Record Keeping & Reports

The college expects all staff to maintain high quality signed and dated child protection records, which separate fact, allegation, hearsay and opinion and which clearly indicate decisions and action taken. These records may in some cases be required in court proceedings.

The college further expects staff to assist the Family and Children's Services Department by providing information for child protection case conferences as required. All records relating to disclosures, safeguarding or child protection issues are kept separately from student files and are stored confidentially. Practices relating to safeguarding and child protection records are also in line with GDPR requirements, as per the college GDPR policy.

16. Monitoring Children on the Child Protection Register

The college expects the Principal/ DSL to ensure that teachers closely monitor the welfare, progress and attendance of all pupils. Relevant and pertinent information relating to children either subject to a Child Protection Plan or deemed Children in Need will be provided in a timely fashion to Family and Children's Services staff.

17. Communicating Policy to Parents and Students

The college will inform parents, staff and students that we have a Safeguarding and Child Protection Policy, and that we are required to follow national and local guidance for reporting suspected abuse to the local authority where the student is resident. The Safeguarding and Child Protection Policy will be made publicly available on the college website.

Students and parents should know how the college's child protection system works and with whom they can discuss any concerns. They should also be directed to local or national telephone help lines. In the first instance parents and pupils should speak to the Principal/DSL, Joe Mattei. If they choose to discuss the matter with another member of staff, they may either contact the Deputy DSL, Virginia Maguire or the Proprietor Mr David Game, whose head office is on site at Westminster Tutors, 86 Old Brompton Road SW7 3LQ.

18. Monitoring and Evaluating Effectiveness of College's Policy

The Proprietor requires the Principal/ DSL to review the effectiveness of the college's Safeguarding and Child Protection Policy annually and to report any associated issues in the college over the preceding year.

19. Legislation & Guidance

Keeping Children Safe in Education (DfE, September 2021)

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE 2018 and September 2021)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

Working Together to Safeguard Children (DfE, July 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf

Guidance for Safer Working Practice For Those Working With Children and Young People in Education (Updated by Safer Recruitment Consortium, May 2019)

<https://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf>

Teaching Online Safety in Schools (DfE, June 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf

Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE, June 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805781/Relationships_Education_Relationships_and_Sex_Education__RSE_and_Health_Education.pdf

Teaching About Mental Health and Emotional Wellbeing (PSHCE Association/ DfE March 2019)

<https://www.pshe-association.org.uk/sites/default/files/u26918/Teaching%20about%20mental%20health%20guidance%20March%202019%20update.pdf>

Children Act 1989, c.41.

<https://www.legislation.gov.uk/ukpga/1989/41/contents>

Children Act 2004, c.31.

<https://www.legislation.gov.uk/ukpga/2004/31/contents>

HM Government (2015) 'What to do if you're worried a child is being abused: advice for practitioners'

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Education and Training (Welfare of Children) Act 2021, c.16.

<https://www.legislation.gov.uk/ukpga/2021/16>

Safeguarding Vulnerable Groups Act 2006, c.47. Schedule 4 (as amended by the Protection of Freedoms Act 2012, c.9.)

<https://www.legislation.gov.uk/ukpga/2006/47/schedule/4>

School Staffing (England) Regulations 2009, no. 2680.

<https://www.legislation.gov.uk/uksi/2009/2680/contents/made>

(Require governing bodies of maintained schools to ensure that at least one of the persons who conducts an interview has completed safer recruitment training)

Education and Skills Act 2008, c.25. Section 128 (Prohibitions, restrictions and sanctions)

<https://www.legislation.gov.uk/ukpga/2008/25/section/128>

Safeguarding Vulnerable Groups Act 2006, c.47.

<https://www.legislation.gov.uk/ukpga/2006/47/contents>

Education Act 2002, c.32.

<https://www.legislation.gov.uk/ukpga/2002/32/contents>

DfE (2021) 'Staffing and employment: advice for schools'

<https://www.gov.uk/government/publications/staffing-and-employment-advice-for-schools>

NSPCC Learning (2021) 'CASPAR safeguarding child protection email newsletter' (current awareness newsletter for practice, policy and research delivers free weekly email alerts to keep you up to date with all the latest safeguarding and child protection news)

<https://learning.nspcc.org.uk/newsletter/caspar/>

Appendix A:

Westminster Tutors

List of Relevant Policies

Safeguarding Policies

Door Entry Consent Form

E Safety Policy

Emergency Lockdown Policy

Prevent Policy

Recruitment of Ex Offenders Policy

Safeguarding & Child Protection Policy

Curriculum Policies

Curriculum Policy
Careers Education & Guidance Policy
PSHCE Policy
RSHE Policy
SMSC Policy

Behaviour Policies

Anti Bullying Policy
Behaviour Policy (inc. Student Code of Conduct)
Complaints Procedure
Staff Code of Conduct

Admissions & Attendance Policies

Admissions & Enrolment Policy
Admissions Process
Attendance Policy

Data Policies

Data Protection Policy
Data Retention Schedule
Privacy Notice Staff
Privacy Notice Students

Health & Safety Policies

Fire Evacuation Procedure
Fire Evacuation PEEPS
First Aid Policy
Health & Safety Policy & Records
Risk Assessment Policy

Inclusion Policies

Inclusion Policy
SEND Policy
Equality Policy
Emotional Health & Wellbeing Policy
Gifted & Talented Policy
EAL Policy

Sports & Activities Policies

Outdoor Recreation Policy
Physical Education Policy
Trips & Outings Policy

Updated: Joe Mattei, September 2021
Date of Next Review: September 2022