WLPA
WEST LONDON PERFORMING ARTS ACADEMY

SAFEGUARDING ADULT & CHILD PROTECTION POLICY 2025/26

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Shanti Babrah / Michelle Welch	
Date of next review	September 2026

Safeguarding is everyone's responsibility

PURPOSE

All students attending the WLPA Academy have the right to be safe and live without fear of harm or abuse. This policy provides guidance and instructions to all staff, volunteers and contractors and sets out the WLPA Academy commitment to safeguarding and promoting the welfare of young people and adults at risk. If any form of abuse is suspected or if a person is identified as being vulnerable to being drawn into terrorism-related activity, appropriate action will be taken. The College requires all staff, trustees and volunteers to share this commitment.

SCOPE

This policy applies to all WLPA Academy staff, volunteers, including trustees, sessional workers, and anyone working on behalf of WLPA Academy. This policy deals with the protection of children and all adults at risk. Throughout this policy reference is made to children and adults at risk.

Definitions

- Child: someone under the age of 18
- Adult at Risk: An adult aged 18 years or over 'who may be in need of community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (DH, 2000). This definition is taken from the current Department of Health guidance to local partnerships.

Students under the age of 18 attending the college are recognised as children, in line with Safeguarding children legislation.

Students over the age of 18 are recognised as adults, in line with Safeguarding adults' legislation.

All references to staff comprise of teaching staff, trustees, other staff and volunteers working in the organisation, visitors, and contractors to the organisation with direct contact with students, regardless of position, role or responsibilities. This policy is mandatory for all of the above.

PRINCIPLES

The College recognises that safeguarding and promoting the welfare of children and adults at risk is everyone's responsibility, and that the best interests of the student must be paramount. We have a statutory duty to ensure that we safeguard and promote the welfare of children and adults at risk of harm in our care. We adopt a student-centred approach which operates in the best interests of each student. The

policy and procedures focus on how we recruit and train our staff, support our students, make referrals and deal effectively with allegations against staff. It incorporates a wide range of risks we need to safeguard against, including those related to the prevention of extremism.

To achieve this, the policy and procedure is reviewed annually to:

- Raise awareness of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for them to learn within the College
- Aid the identification of children, young people and adults at risk of significant harm, providing procedures for reporting concerns
- Establish procedures for reporting and dealing with allegations of abuse against members of staff
- Outline the role of the trustees
- Respond to the safe recruitment of staff

All staff will receive appropriate training in order to familiarise them with the College's Safeguarding Policy and Procedure, relevant statutory guidance, the safeguarding issues and their responsibilities therein.

All staff undertake mandatory safeguarding and Prevent training (to include 'Part One of Keeping Children Safe in Education) as part of their induction process and continual professional development (CPD) on an annual basis. Staff are able to access polices via the online portal of the WLPA Academy website.

EQUALITY STATEMENT
The College will make sure that all students have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. The College is committed to anti-discriminatory practice and recognises the additional needs of young adults from minority ethnic groups and those with learning disabilities and/or difficulties and the barriers they may face, especially around communication.

OUTCOMES
Because of this policy and its procedures being followed:
•	Students at risk will be better protected from the impact of abuse or neglect
•	all persons detailed in the 'scope' (above) will take the necessary steps to safeguard and protect the rights of students at the College
•	statutory agencies will be contacted where appropriate.

STATUTORY FRAMEWORK
The Care Act 2014 places specific safeguarding duties with regard to an adult who has need for care and support and is experiencing or at risk of abuse or neglect. Because of those needs the adult is unable to protect

themselves from either the risk, or the experience, of abuse or neglect.
The Care Act 2014 Section14.2 states that the safeguarding duties apply to an adult who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. An adult is a learner aged 18 or above at the point of enrolment at college.
 The College aims to meet all relevant legislative requirements and good practice in safeguarding.

This statutory framework includes:

- Keeping Children Safe in Education 2025, Working Together to Safeguard Children 2018, the Safeguarding Vulnerable Groups Act 2006, The Protections of Freedom Act 2012 and the Prevent Duty Guidance are the key documents upon which this policy is based
- The Education & Inspections Act 2006, The Serious Crimes Act (2015)
- The Mental Capacity Act 2005
- The Care Act 2014
- The Children Act 2004
- Prevent Duty Guidance for Further Education Institutions in England and Wales July 2015
- The Children Act 2004, which is fundamental to professionals working with children and young people in the UK
- The Protection of Children Act 1999 requires employers to carry out Criminal Record Checks before employees are allowed to come into contact with children
- The Education Act 2002 (as amended) requires that governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of children and young people
- the Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- The Sexual Offences Act 2003 makes it an offence for a person over 18 (e.g. a lecturer or other member of staff) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if s/he does not teach The Safeguarding Vulnerable Groups Act 2006 which sets out the type of activity in relation to children and adults at risk for which employers and individuals will be subject
- The Protection of Freedoms Act 2012 which changed the definition of Regulated Activity including who is eligible for a barred list check
- The Equality Act 2015
- SEN Code of Practice 2015
- Ealing Safeguarding Children Guidance 2022 (Yellow Book)
- Ealing Safeguarding Adults Board Guidance

VULNERABLE STUDENT

A vulnerable student may be identified as a person who:

- Is a Looked After Child
- Is a care leaver
- Is a young carer
- Has learning difficulties or disabilities
- Has mental health difficulties (e.g. dementia, personality and eating disorders)
- Has general welfare concerns
- Has a physical or sensory disability
- Has been involved in substance or alcohol misuse
- Has suffered from domestic violence
- Has social or emotional developmental needs
- Has a criminal conviction
- Has a language barrier.

All students attending the College can be classed as vulnerable students as they have an EHC Plan which defines their needs.

DEFINITIONS

Safeguarding

The term 'safeguarding children and adults at risk' covers both reactive adult/child protection and a preventative approach to keeping children and adults safe. Safeguarding and promoting the welfare of children is defined as: protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education - https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Child protection relates to any child (under 18) who has suffered from, or may be at risk of physical injury, neglect, emotional abuse or sexual abuse. Safeguarding relates to children, young people and vulnerable adults and means protecting their health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect, including protecting children and young people who are vulnerable or at risk of being radicalised.

Definition of Safeguarding Adults

The Care Act 2014 states 'Safeguarding means protecting an adult's right to live in safety and free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and the experience of abuse and neglect, while at the same time making sure that the adults wellbeing is promoted including where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action' The Care Act 2014 places procedures for safeguarding adults on a statutory footing and defines what an adult at risk is. It emphasises the need for multi-agency working with a focus on outcomes for the adult at risk. The Act also highlights the importance of everyone's responsibility to protect adults at risk of abuse.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between students outside of these environments. All staff, but especially the DSL and DDSLs will be considering whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as *Contextual Safeguarding*, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Abuse: a form of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact of all forms of domestic abuse, including where they see, hear or experience its effects. 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. They may be abused by an adult or adults or another child or children.

Physical Abuse

This may involve:

- hitting
- shaking
- throwing
- poisoning
- burning
- scalding
- misuse of medication
- inappropriate use of restraint
- drowning or suffocating

Typical behaviours associated with physical abuse:

- Wary of physical contact
- Do not expect/want to be comforted
- Seem less afraid than other children
- Seek information about what is going to happen to them
- Kept away from school

Common sites of accidental injury:

- Crown of head
- Forehead
- Nose
- Elbows
- Hips
- Hands
- Knees
- Shins

Common site of non- accidental injury:

- Eyes – two black eyes always a concern
- Cheeks
- Ears
- Mouth
- Stomach
- Buttocks
- Inner Arms
- Remember – most non-accidental injuries leave marks on the body.

What to look out for:

- Eyes – the eye is well protected against accidental injury by its bony

socket. Look out for bloodshot eyes.
- Slapping, smacking, gripping – finger marks, earache, swelling, reddening.
- Throttling or strangling – finger marks, thin red line.
- Raised wheals – buckle marks.
- Human bites – elliptical bruise, teeth marks. Bites are never accidental!
- Burns – Not common for multiple burns to be caused accidentally.
- Cigarette burns – often found in groups. Seldom heals without medication.
- Scald – on hands and feet, particularly if clear demarcation line.

It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child, young person or adult at risk.

It is important to recognise the multitude of abusive situations that overlap within these definitions. Children and vulnerable adults may be at risk of abuse through such varied issues as bullying (including cyberbullying), substance misuse, child criminal or sexual exploitation, female genital mutilation, breast ironing, forced marriage, radicalisation and extremist behaviour, abuse related to protected characteristics e.g. racism/sexism/homophobia, domestic abuse, serious violence (including that linked to CCE), sharing of nude or semi-nude images, and others. It is also important to recognise that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), child criminal and/or sexual exploitation, gender based violence/sexual assaults and sharing of nude or semi-nude images. All staff must 10 remain alert to the possibility of child on child/peer-on-peer abuse and take appropriate action to safeguard those involved, in line with this procedure.

Child Missing Education (CME)/ Absent From Education:

Working together to Improve School Attendance, is now statutory guidance.

1. **Purpose**
   This policy describes WLPA Academies responsibilities and procedures to identify, prevent and act on Children Missing Education (CME), in line with the DfE statutory guidance (updated 8 Sept 2025). GOV.UK

2. **Definitions**
   "Children Missing Education (CME)" — children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise. This includes children who are electively home

educated, children in temporary accommodation, recent movers, and those whose whereabouts are unknown. GOV.UK

3. **Responsibilities**

- Headteacher: overall responsibility to ensure this policy is implemented.
- Attendance Lead: operational lead for identifying and managing CME cases (contact: [name/contact]).
- DSL: responsible for safeguarding escalation where CME indicates risk of harm. GOV.UK

4. **Admission register and removal process**
Before removing a pupil from the admission register the school will:
a. Obtain evidence of a new school placement or suitable education provision;
b. Complete searches using national tools (GIAP, S2S) and record results;
c. Contact the LA CME officer if the destination or evidence is not clear and follow LA instructions;
d. Only remove the pupil when evidence or LA instruction is obtained;
otherwise keep on register and continue enquiries. National College+1

5. **Information sharing & use of national systems**
The school will use GIAP and S2S to check registrations and will share required information promptly with the LA. Records of searches and communications will be retained in [location] for [x years]. National College+1

6. **Safeguarding escalation**
If CME or absence raises safeguarding concerns the DSL will be notified immediately and consider referral to children's social care. GOV.UK

7. **Data & monitoring**
A termly report on CME cases for the SLT and governors will be compiled, and will comply with LA data requests and local CME database participation where applicable. GOV.UK+1

8. **Enforcement**
Use of SAOs or other legal measures will be considered when all reasonable steps to secure the child's education have been exhausted. Decisions will be recorded and authorised by [post]. GOV.UK

9. **Training & review**
   Staff will receive training each year on CME indicators and use of national tools. This policy will be reviewed annually or when the DfE/LAs publish updated guidance. [GOV.UK](GOV.UK)

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities such as abuse or neglect. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

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.

Neglect – what to look for:

- Poor hygiene
- Dirty clothes
- Poor skin condition
- Dirty teeth and halitosis
- Underweight
- Inadequately clothed
- Failure to provide glasses • Shoes too small
- Anaemia • Poor hair quality – frequent infestations
- Frequent bouts of gastro-enteritis
- Prominent joints
- Hands red and swollen
- Protuberant abdomen

Typical behaviours associated with neglect:

- Preoccupied with food – stealing.
- Gains weight when away from home
- Overly tired
- Unable to concentrate on schoolwork
- Poor language skills
- Poor motor development
- Often absent

Self-Neglect

a condition affecting behaviour, where the individual refuses to attend to their personal care and hygiene, their environment or even refusal of care services offered to them.

Sexual Abuse and Exploitation

Sexual abuse involves a child, young person or adult at risk being forced or coerced into participating in or watching sexual activity. It is not necessary for the child, young person or adult at risk to be aware that the activity is sexual and the apparent consent of the child, young person or adult at risk is irrelevant. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

Emotional Abuse

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.

What to look for:
This is one of the most difficult types of abuse to recognise "Behavioural Signs" rather

than physical:

- Withdrawn
- Sucking
- Biting
- Rocking
- Introverted
- Depressed
- Anti-social
- Destructive
- Child on child abuse

 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 they are 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 students in looking at, or in the production of, sexual images, watching sexual activities, encouraging students to behave in sexually inappropriate ways, or grooming a student in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children/young people.

What to look for:

- Detailed sexual knowledge inappropriate to the ability of the young person
- Sexualised behaviour
- Promiscuity
- Excessively affectionate or sexual
- UTI and/or STD
- Awkwardness in walking or sitting down
- Constipation or soiling
- Child on Child abuse
- Pain itching or bruising
- Bleeding of the genital or anal areas
- Sudden or unexplained changes in behaviour

Mental Health

We are aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where students have suffered abuse and neglect, or other potentially traumatic adverse experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these students' experiences can impact on their

mental health, behaviour and education. If staff have a mental health concern about a student that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies.We also note the DfE's advice and guidance on *Mental* *Health and Behaviour in Schools*.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are: children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who are regularly absent from school or education or do not take part in education. Any possible CCE case will be shared with the DSL with a view to referring to appropriate agencies.

Child Sexual Exploitation (CSE)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children or young people being sexually exploited are: going missing for periods of time or regularly coming home late; being regularly absent from school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17 year old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Further information on signs of a child's involvement in sexual exploitation is available in Home

Office guidance: *Child sexual exploitation: guide for practitioners*.

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a student at the college, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 15, an individual risk assessment will be conducted in accordance with the *London Safeguarding Children Procedures*. This will determine how and when information will be shared with parents and the investigating agencies.

Both CCE/ (CE) and CSE/ (SE) can affect children and adults at risk , both male and female and can include children who have been moved (commonly referred to as trafficking- which is described as a form of modern day slavery) for the purpose of exploitation.

Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. Sharing nudes and semi-nudes covers the incidents where
- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18 a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. Further information and advice on nudes and semi-nudes is available in the non-statutory guidance produced by the UK Council for Internet Safety (UKCIS) '*Sharing nudes and semi-nudes: advice for education settings working with children and young people*'. We also note the DfE's *Searching Screening and Confiscation Advice* for schools.

Serious violence

All staff will be made aware of indicators, which may signal that students are at risk from, or are involved with serious crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. We are aware that there is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced

child maltreatment and having been involved in offending, such as theft or robbery. We are also aware that fear and a need for self-protection is a key motivation for young people to carry a weapon – it affords a young person a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Young people are more likely to carry knives and other weapons than guns. All staff will be aware of the associated risks and will share any concerns about or knowledge of such students immediately with the DSL. Further advice on these is available in the Home Office documents *Advice to schools and colleges on gangs and youth violence* and *Criminal exploitation of children and vulnerable adults: county lines*.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children and vulnerable adults can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children and young people are also increasingly being targeted and recruited online using social media. Children and young people can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children and young people who: go missing from school or home and are subsequently found in areas away from their home; have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a 'traphouse or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters; have their bank accounts used to facilitate drug dealing.

Financial Abuse

Where financial abuse occurs, the victim does not always realise that it is abuse. It can be in the form of asking for money to be your friend, stealing your belongings, taking someone's pension, or just the constant borrowing of money and never returning it.

Significant Harm

Some children may be in need because they are suffering or likely to suffer significant harm. The Children Act 2014 section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.

Honour-based Violence (HBV)

Honour-based violence, encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse and should be handled and escalated as such.

Female Genital Mutilation (FGM) mandatory reporting duty

From October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales.

Mandatory reporting duty applies to all regulated professionals (as defined in section 5B(2)(a), (11) and (12) of the 2003 Act) working within health or social care, and teachers.

We note that, in addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

College staff, including qualified teachers or persons who are employed or engaged to carry out teaching work, must report '**known**' cases of FGM in **girls aged under 18** to the police.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales and the law forbids formal or informal marriages involving anyone under the age of 18. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We note The Forced Marriage Unit's statutory guidance *The right to choose: government guidance on forced marriage* and especially Chapter 8 of the *Multi-agency guidelines*, which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

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birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Forced marriage is a criminal act and a child protection issue as the child is at risk of significant harm through sexual, physical and emotional abuse.

Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

Child on child abuse

Children are capable of abusing other children. This can happen in person, outside of college and online and take different forms, such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- abuse in intimate personal relationships between children;

- physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, which may include an online element that facilitates, threatens and/or encourages physical abuse

- violence, particularly pre-planned

- forcing other children to use drugs or alcohol

- initiation/hazing type violence and rituals)

- emotional abuse (blackmail or extortion, threats and intimidation)

- sexual violence, such as rape

- assault by penetration and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment,

- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery)

- sexual abuse (indecent exposure, indecent touching or serious sexual assaults

- forcing other children to watch pornography or take part in sexting)

- sexual exploitation (causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts)

- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.

Upskirting is now a criminal offence. Although it is more likely that girls will be victims and boys perpetrators, all child on child abuse is unacceptable and will be taken seriously. We do not tolerate these or pass them off as banter", "just having a laugh" or "part of growing up".

The college has a strong commitment to an anti-bullying policy and will consider all coercive acts and child on child abuse within a Child Protection context. We recognise that some students will sometimes negatively affect the learning and wellbeing of other students and their behaviour will be dealt with under the college's behaviour policy. As a college, we will minimise the risk of allegations against other pupils by providing a robust PSHE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe, having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on assertiveness and keeping safe those pupils identified as being at risk, developing robust risk assessments and providing targeted work for students identified as being a potential risk to others. It is important that all our staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. Any possible child on child abuse case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on *Preventing and* *Tackling Bullying*.

Harmful sexual behaviour (HSB)

Sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. We consider HSB in a child protection context. We aim to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole college approach to safeguarding. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Students displaying HSB have often experienced their own abuse and trauma. We will work with appropriate agencies to address HSB and to support students displaying HSB.

Students who are lesbian, gay, bi, or trans (LGBTQ+)

We note that a student who may be LGBTQ+ is not in itself an inherent risk factor for harm. However, students who are LGBTQ+ can be targeted by other students. In some cases, a student who is perceived by other students to be LGBTQ+ (whether they are or not) can be just as vulnerable as students who identify as LGBTQ+. Risks can be compounded where students who are LGBTQ+ lack a trusted adult with whom they can be open. Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBTQ+ inclusion is part of the statutory *Relationships Education, Relationship and Sex Education and Health Education* curriculum. We will work with appropriate

agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to LGBTQ+ students.

We will have regard to appropriate DfE guidance concerning gender questioning young people.

Violence Against Women and Girls (VAWG)
VAWG is defined as any act of gender–based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

Sexual harassment, online sexual abuse and sexual violence

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable at the college and we have appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence are happening in and around the college, even when there are no specific reports. We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-college approach that includes an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent. We will ensure students are taught about safeguarding risks, including online risks and will support students to understand what constitutes a healthy relationship, both online and offline. Our staff members have been made aware and have appropriate knowledge of '*Part 5: Child on child sexual violence and sexual harassment*' of DfE guidance "*Keeping children safe in education*". All students are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure students are confident that this is the case. We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, additional needs, and students from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls/young women and LGBTQ+ students). We will identify and address any barriers that can prevent a student from making a disclosure, for example communication needs. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims. Where necessary, we will work with relevant external agencies to address the issue. We will keep comprehensive records of all allegations.

Sexual violence and sexual harassment between students

Sexual violence and sexual harassment can occur between two students of any age and sex. It can also occur through a group of students sexually assaulting or sexually harassing a single student or group of students. It can occur online and offline (both physically and verbally). It is more likely that girls/ young women will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys / young men. Students who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. We will handle reports of sexual violence and harassment between children, both on and outside school premises, in line with '*Part 5: Child on child sexual violence and sexual harassment*' of DfE guidance "*Keeping children safe in education*" and train our staff members accordingly (including tutors delivering relationships, sex and health education). Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue.

On one hand, we need to safeguard the victim (and the wider student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will take advice, as appropriate, from social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to others. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the safeguarding file.

PREVENT DUTY

In line with the Prevent Duty Guidance for Further Education Institutions in England and Wales (2015), protecting students from the risk of radicalisation is part of the Colleges' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. Students may be identified as vulnerable to radicalisation at any time during their programme of study based on behaviour. The Channel framework of indicators which may provide triggers leading to engagement with a group, cause or ideology associated with terrorism may include:

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change

- Opportunistic involvement
- Family or friend's involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

Statutory Prevent Guidance for Further Education (2015) summarises the requirements in terms of the following key areas:

- external speakers and events
- partnerships
- risk assessment and action plan
- staff and student training
- welfare and pastoral care and IT Policies.

Radicalisation refers to the process by which a person comes to support terrorism or other forms of extremism.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

All staff working at The College (including visiting staff, volunteers, contractors and students on placement) are required to be able to identify and report instances where they believe a young person may be at risk of harm or neglect including any harm through extremism or radicalisation to the Designated or Deputy Safeguarding Lead (DSL). All students will be given information about radicalisation and extremism, they will have a safe place to discuss the risk relating to their communities and they will know where to go to ask for help.

Under the Prevent Duty, safeguarding staff will be trained to recognise when it is appropriate to make a referral to the Channel Programme to support students who may be vulnerable to such influences and where we believe a student is being directly influenced by extremist materials or influences. It is unacceptable to download or transmit any material which might reasonably be considered obscene, abusive, sexist, racist, defamatory, related to violent extremism or terrorism or which is intended to annoy, harass or intimidate another person. Assessing risks for planned events, including off site events, external visitors and speakers will take place.

SPECIFIC SAFEGUARDING ISSUES

All staff should have awareness of the following safeguarding issues and of the legislative duty in relation to these concerns:

All disclosures will be recorded and reviewed termly by the DSL and Deputy DSL and included in the Safeguarding Report for the trustees to ensure appropriate

support mechanisms are in place for both victims and perpetrators.

Cases of students hurting other students will be managed in line with the following policies:

- Anti-bullying Policy
- Behaviour Policy

Safeguarding Policy and Procedures take precedent where the alleged behaviour:

- is serious, and potentially a criminal offence
- could put students at the college at risk
- involves students being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

Risks of peer-on-peer (child-on-child) abuse will be managed by:

- challenging any derogatory or sexualised language or behaviour, including requesting or sending sexual images
- being vigilant to issues that particularly affect different genders
- direct instruction within the curriculum to develop understanding of appropriate behaviour and consent
- ensuring students know they can talk to staff confidentially
- ensuring staff are trained to understand that a student harming a student could be a sign that the student is being abused themselves, and that this would fall under the scope of this policy.

If staff are aware of an incident involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery), they must report it to the DSL immediately. Staff must not

- view, download or share the imagery, or ask a student to share or download it
- delete the imagery or ask the student to delete it
- ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- say or do anything to blame or shame any young people involved

Staff should explain that they need to report the incident and reassure the student that they will receive support and help   .

Child on child sexual violence and sexual harassment

Where any reports are made of child on child sexual violence or sexual harassment these must be dealt with seriously and quickly. Where such an allegation is made, the DSL will conduct a thorough risk assessment that considers:

- The victim, especially their protection and support
- The alleged perpetrator: and
- All the other students (and, if appropriate, staff) at the college, especially any actions that are appropriate to protect them.

Allegations and the investigation will be recorded. Any subsequent risk assessment will be communicated to all staff that are required to know. Both victim and (alleged) perpetrator will receive appropriate support mechanisms from the college on a case by case basis.

ON-LINE SAFETY

The College will monitor all internet use to ensure and maintain the safety of staff and students.

Staff and students must follow the Online Safety Policy and agree to the relevant Acceptable Use Policy.

ROLES AND RESPONSIBILITIES

The Senior Leadership Team

Instruct the college to:

- provide a safe environment for all students at risk of harm
- identify those that are suffering, or are likely to suffer significant harm or who are at risk of radicalisation
- ensure appropriate IT filters and monitoring systems are in place to ensure online safety
- ensure disclosures of potential abuse are reported appropriately
- have a system for identifying concerns in relation to abuse of children and adults at risk of harm and effective methods of responding to disclosures
- refer concerns to appropriate referral agents within social care
- work effectively with others as required by Keeping Children Safe in Education
- listen to the voice of the student and always act in the interest of the student
- ensure appropriate safeguarding responses for students who go missing from College
- ensure there is an effective Safeguarding Policy in place
- ensure all staff undertake relevant Safeguarding training
- have a clear understanding of safeguarding policy, procedure and practice at the college understand that additional barriers can exist for students with special educational needs (SEN) and disabilities when recognising abuse and neglect in this group.

Our Senior Leadership Team and Trustees recognise that whilst all students should be protected, some groups, such as those who need a social worker; those who are

absent from education; those requiring mental health support; looked after and previously looked after children; care leavers; those with special educational needs, disabilities or health issues, are potentially at greater risk of harm than others (both online and offline).

The Senior Leadership Team will approve and annually review policies and procedures. They will prepare regular safeguarding reports to:

- maintain awareness of progress across the College and/or issues relating to the welfare of young people and adults at risk of harm
- be reassured by the SLT and DSL that systems are in place and are effective in relation to the identification of young people and adults at risk of harm, and procedures for reporting concerns are widely known
- ensure effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with students are in place including referral to Local Area Designated Officer, (LADO)
- ensure safe recruitment of staff and volunteers
- ensure staff are appropriately trained to discharge their duties in relation to safeguarding and Prevent
- ensure procedures are in place to make referrals to the Disclosure and Barring Services (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been if they had not resigned.

In accordance with the DfE's *filtering and monitoring standards,* the Senior Leadership Team, Miss Welch and Miss Babrah, ensure that these standards are being met. This will be reported to the Trustees in termly meetings.

In developing policies and procedures, the SLT will take account of guidance issued by the Department for Education, and other relevant bodies and groups. The College recognises its duty under the Counterterrorism and Security Act (2015) to have due regard to the need to prevent people from being drawn into terrorism.

Designated Safeguarding Lead

The Designated Safeguarding Lead, (DSL) is Michelle Welch.

The Deputy Designated Safeguarding Lead, (DDSL) is Shanti Babrah

The DSL works directly with the Deputy DSL to maintain day to day implementation of this policy.

The DSL has a significant level of responsibility and are provided with the additional time, funding, training, resources, and support needed to carry out their role effectively.

The DSL and Deputy DSL will ensure appropriate and robust systems are in place

that will coordinate reporting, monitoring, referral and support procedures. The DSL and Deputy DSL have a key duty for raising awareness across all staff of issues relating to the welfare of young people and adults at risk studying within the College. The DSL and Deputy DSL will undertake relevant Adult and Child Safeguarding training, including inter-agency working. The DSL and Deputy DSL will receive refresher training every two years and keep updated annually on safeguarding information and knowledge.

The DSL is responsible for understanding the online filtering and monitoring

systems in place. The DSL and Deputy DSL are responsible for

- overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies
- providing advice and support to other staff on issues relating to safeguarding
- providing all staff and leaders with regular updates on safeguarding at least annually
- maintaining a proper record of any child protection referral, adult safeguarding referral, complaint or concern (even where that concern does not lead to a referral)
- ensuring the Safeguarding Policy is updated and reviewed annually and approved by the trustees
- ensuring that parents/carers are aware of the College's Safeguarding Policy
- developing effective working relationships with other agencies such as Police, Social Services, Health Authority
- liaising with partner agencies offering placements to students
- ensuring that staff who are liaising with employers and training organisations that receive students from the College on placements put appropriate risk assessments and safeguards in place
- ensuring safe recruitment practices by implementing enhanced checks on all new and existing staff in accordance with the Disclosure and Barring Service (DBS), obtaining references and recruitment in accordance with Department of Education guidance
- providing tutorial or other curriculum, learning or pastoral support. The curriculum (both formal and informal) will be used to help students develop self-esteem and resilience
- ensuring all staff receive basic training in Safeguarding and Prevent issues appropriate to their roles and are aware of the College safeguarding procedures
- ensuring that the college contacts the LADO (Local Authority Designated Officer)- regarding allegations against staff and, as a good practice, contacts the LADO consultation regarding concerns raised in relation to members of staff (known as 'low level concerns).
- ensuring Health and Safety procedures are in place for students, including off site
- providing termly safeguarding reports to the trustees.

Staff: Duty of Care

Staff are accountable for the way in which they exercise authority, manage risk, use resources and actively protect all students from discrimination and avoidable harm. Staff should develop respectful, caring and professional relationships between all members of the college community.

Staff behaviour should demonstrate integrity, maturity and good judgement and comply with the Staff Code of Conduct at all times.

All our staff will be aware that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, students may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a student. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

If a student makes a disclosure:

Repeat the young person's words only – Do not elaborate, do not ask questions, or put thoughts into their heads.

Say "it is not your fault" or "you are right to tell me".

Report this immediately on the day of disclosure to the DSL directly, write everything down quickly and precisely, keep any notes you have made including times, dates and location. Ensure you then complete a CPOMS incident log detailing your actions.

The Senior Leadership Team

Will ensure that they comply with their duties under legislation and that the policies, procedures and training in the college are effective and comply with the law at all times. The SLT will also ensure that all trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at The WLPA Academy are effective and support the delivery of a robust approach to safeguarding. Their training will be regularly updated. The SLT will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements. Further information can be found at *Human Rights | Equality and Human Rights Commission* and *Equality Act 2010: advice for schools*.

Our SLT will do all that they reasonably can to limit student's exposure to the risks from the college's IT system. As part of this process, our SLT will ensure that the college has appropriate filters and monitoring systems in place and regularly review their effectiveness. They will ensure staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns

when identified. Students do not however have access to the IT system without requesting access from staff in the first instance.

The SLT will ensure that the college contributes to inter-agency working in line with statutory guidance "*Working Together to Safeguard Children*", and will ensure all procedures set out in the Ealing Safeguarding Children Guidance (The Yellow Book), Ealing Safeguarding Children's Board,(ESCB), Ealing Safeguarding Adults Board Guidance, (EASB) are followed. The SLT have formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are necessary.

Concerns about and allegations of abuse made against the SLT will be referred to the Designated Lead, DDSL or trustees. They will liaise with the LA's designated officer (LADO) and partner agencies and will attend any strategy meetings called in respect of such an allegation against any member of the SLT.

As a good practice, the SLT will provide a termly report to the Trustees outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

Also as a good practice, the SLT/DSL will meet on a regular basis the DSL to monitor the college safeguarding arrangements and both the volume and progress of cases where a concern has been raised to ensure that the college is meeting its duties in respect of safeguarding.

Wearing of staff ID
All staff must visibly wear a WLPA black lanyard, students must visibly wear a WLPA Academy purple Lanyard with photo ID whilst on site.

Green Lanyards will be worn by visitors who have been pre DBS checked or are able to produce a current DBS.
Red Lanyards will be worn by visitors unable to produce a DBS certificate.

All visitors will be accompanied for the entirety of the time whilst on site.

Recruitment

Safer Recruitment
The WLPA Academy is committed to the principles of safer recruitment and, as part of that, adopts recruitment procedures that help deter, reject and/or identify people who might abuse students. Safe recruitment processes are followed and all staff recruited to the college will be subject to appropriate identity, qualification and health checks. As part of the shortlisting process we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we may explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks. References will be verified and appropriate criminal record checks [Disclosure and

Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the college.

Relevant members of staff and trustees who are involved in recruitment will undertake safer recruitment training. The college will ensure that at least one person on any appointment panel has undertaken safer recruitment training in accordance with staffing regulations.

This college will only use employment agencies which can demonstrate that they positively vet their supply staff. Any alleged misconduct of temporary or agency staff will be reported to the employer concerned. Staff joining the College on a permanent or temporary basis will be given a copy of this policy. Additionally, staff will be provided with access to the staff portal where all safeguarding policies and procedures can be found, together with the staff code of conduct.

ALLEGATIONS MADE AGAINST/CONCERNS RAISED IN RELATION TO STAFF

The WLPA Academy takes seriously all allegations made against and concerns raised in relation to members of staff. We will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the college are dealt with promptly and appropriately. Procedures are in place for students, parents and staff to share any concern that they may have about the actions of any member staff, including supply teachers, volunteers and contractors. All such allegations and concerns will be brought immediately to the attention of the SLT/Designated Safeguarding Leads nothing should be said to the colleague involved. In cases where a member of the SLT is the subject of the allegation or concern, they will be reported to an alternate member of the SLT/DDSL.

There may be two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – known as 'low level concerns.

Allegations that may meet the harms threshold

These procedures are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity in the college and will be used in respect of all cases in which it is alleged that anyone working in the college, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a student, or may have harmed a student and/or;
- possibly committed a criminal offence against or related to a student and/or
- behaved towards a student or students in a way that indicates he or she may pose a risk of harm to students; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with students. This includes behaviour that may have happened outside of college that might make an individual unsuitable to work with students, which is known as transferable risk.

The Local Authority Designated Officer (LADO) should be informed of all such

allegations that come to a college's attention and appear to meet the above criteria. Where we identify a student has been harmed, that there may be an immediate risk of harm to a student or if the situation is an emergency, we will contact the social care and/or the police immediately as per the referral process contained in this policy.

When dealing with allegations, we will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the student and support the person subject to the allegation.

Some rare allegations will be so serious they will require immediate intervention by social care services and/or police. In such cases, referral will lead to a Strategy Meeting or Discussion. This process will agree upon the appropriate course of action and the time-scale for investigations.

The college has a legal duty to refer to the DBS when an individual is removed from regulated activity (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. The DBS will consider whether to bar the person. Referrals will be made as soon as possible when an individual is removed from regulated activity. Where we dismiss or cease to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State, as required by law.

Concerns and/or allegations that do not meet the harms threshold – known as 'low level concerns'

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a student does not meet the harm threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. **However, as a good practice, we will contact the LADO for consultation to ensure that we follow the appropriate and correct procedures even when the concern seems to be 'low-level'.**

All 'low-level' concerns will be brought immediately to the attention of the SLT/DSL/DDSL or one of and nothing should be said to the colleague involved. In cases where a member of the SLT/DSL is the subject of the concern, they will be reported an alternative member of the SLT/DDSL.

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance "*Keeping children safe in education*".

CONFIDENTIALITY

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the student is the overriding concern. The degree of confidentiality will be governed by the need to protect the student. The student must be informed at the earliest possible stage of the disclosure that the information will be passed on. Discussions of the case must only be with the appropriate staff and any discussion must be private and shared on a need to know basis. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of students. The College Is committed to protecting the rights and privacy of individuals, including students, staff and others, in accordance with the General Data Protection Regulations (GDPR) set out in the Data Protection Act 2018 that allows for disclosure of personal data where this is necessary to protect the vital interests of students.

SAFEGUARDING RECORDING/REPORTING

All safeguarding concerns are either identified by, or referred through to, the DSL and Deputy DSL, by members of staff, students, (either self-referring or bringing concerns about peers), parents/carers, employers or volunteers.

When a staff member logs a safeguarding concern an alert is sent immediately to the DSL or DDSL in their absence. The DSL will then decide an immediate/urgent action that is required.

The DSL will investigate all concerns and allegations, make a judgement on next steps and then refer on to the appropriate agency.

The DSL will take advice from the LADO if further guidance is required.

All cases are recorded on the CPOMS system as incidents under the relevant category. Access to safeguarding concerns on CPoms is secure. All staff can record concerns. Only the DSL and Deputy DSL can access records.

Identifying and monitoring those at risk of abuse

The SLT meet every afternoon after all students have left for the day. During this meeting we explore and discuss attendance and all concerns. We will also identify any other students that may require monitoring.

All Safeguarding concerns/disclosures are discussed at termly trustee meetings. Names of students are withheld so as not to identify an individual.

Monitored Students

All students at the WLPA Academy are continually monitored to ensure their safety and well-being. In some cases, we may need to identify a specific 'Monitored Student'. This student is someone that the team have ongoing safeguarding concerns for. This is discussed and decided when the concern is raised and then added to the agenda for SLT meetings. Students are identified as a 'Monitored Student' due to a number of reasons at the discretion of the safeguarding team but

usually include attendance, level of concern or number of concerns. The team discuss actions that have been taken to support a monitored student since the last meeting, any progress that has been made or any new concerns. The team agree the next step of action to safeguard this young person to be completed by the next meeting. Action could include monitoring, contact with parents, contact with social services, multi professional meeting etc. If a student has had a period of time without concerns, they may be removed from the monitored list. They can move back onto the monitored list at any time.

Prevention

Safeguarding is central to the well-being of the individual and is therefore seen to be an intrinsic part of all aspects of the curriculum. Because of our students individual and limited understanding an individual approach is used. We aim;

- To provide time, space, and opportunities for students to explore issues of concern.
- To equip students with the appropriate tools to make choices, judgements, and decisions.
- To promote a positive self-image.
- To teach students to recognise their own feelings and emotions and to express these in an appropriate manner.
- To teach students to respect everyone including each other's gender, disability, cultural background, religion, and sexual orientation and to foster tolerance and understanding of individual differences.
- To teach safe practice using the internet, social media and personal communication aids including mobile telephones.
- To recognise potential risks and take action to avoid these, seek help and report difficulties.
- To make Safeguarding personal, encouraging choices and self-determination

Contact Numbers:

WLPA Academy Designated Safeguarding Lead - DSL

Michelle Welch 07850 222 480 – WelchM@wlpaacademy.com

WLPA Academy Deputy Designated Safeguarding Lead - DDSL

Shanti Babrah – 0203 637 8826 – Shanti@wlpaacademy.com

Local Authority Contacts:

LADO for Ealing
Emmanuel Adofo - 0208 825 8930 asv@ealing.gov.uk

Ealing Children's Integrated Response Service (ECIRS)
020 8825 8000 – ecirs@ealing.gov.uk

Child protection duty desk - 0208 825 8930

Ealing Local Authority Head of Safeguarding
Paul Andrews - 020 8825 5264 AndrewsP@ealing.gov.uk

Local Authority Prevent Contact – prevent@ealing.gov.uk

Forced Marriage Contact – 020 7008 0151

Ealing Adult Social Services – 0208 825 8000   sscallcentre@ealing.gov.uk

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Other useful contact numbers:

NSPCC Child protection helpline – 0800 800 5000 (a free 24 hour service)

NSPCC Whistelblowing Advice Line – 0800 028 0285

Childline – 0800 1111 (a free 24 hour helpline for children)

NSPCC FGM Helpline – 0800 028 3550 (24 hour service) fgmhelp@nspcc.org.uk

The Mix under 25s support line – 0808 808 4994 (3pm – 12am daily)

The Mix – Urgent mental health support text line – 85258

The Samaritans – 116 123 (a free 24hour service)

This policy has been agreed by the SLT and Trustees and will be implemented immediately

Date of next review: September 2026