



Policy to Safeguard and Promote the Welfare of Children who are Pupils at the Foundation

September 2020

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| Name and post of person responsible | Jane Sanchez, Head of Mill Hill School |
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| | Name (role): |
| Written: | Jane Sanchez & Paul Symes |
| Externally ratified: | Sophie Mortimer |
| Ratified: | Pastoral Committee of the Court of Governors |
| Signed by: | Elliot Lipton (Chair of Governors) |
| Next Review: | September 2021 |

The Policy to Safeguard and Promote the Welfare of Children who are Pupils at the foundation 2020/21

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Key External Contact Details

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| Designated Officer in the Local Authority | Shrimatie Bissessar, Allegations Team Manager, London Borough of Barnet. Tel: 0208 359 4528; Mobile: 0790 358 2861 |
| Multi – Agency Safeguarding Hub (MASH) | Tel: 0208 359 4066 Out of Hours Emergency Duty Team Tel: 0208 359 2000 |
| Support and Advice about Extremism | National Anti Terrorist hotline: 0800 789 321 Sam Rosengard, Barnet Prevent Coordinator on Barnet CST-gcsx@barnet.gcsx.gov.uk Police: Emergency 999; Non Emergency 101 DfE: Non Emergency: 020 7340 7264; Email: counter.extremism@education.gsi.gov.uk |
| NSPCC Whistleblowing Advice Line | Address: Weston House, 42 Curtain Road, London EC2A 3NH Tel: 0800 028 0285 Email: help@nspcc.org.uk |
| Disclosure and Barring Service | Address: PO Box 181, Darlington DL19FA Tel: 01325953795 Email: dbsdispatch@dbs.gsi.gov.uk |
| Teaching Regulation Agency | Address: 53-55 Butts Road, Earlson Park, Coventry, CV1 3BH Tel: 0207 593 5393 Email: misconduct.teacher@education.gov.uk |
| Ofsted Safeguarding Children | Tel: 0300 123 4666 Email: Whistleblowing@ofsted.gov.uk |
| Forced Marriage Unit | Tel: 0207 0080151 Email: fmufco.gov.uk |
| Local Authority Housing Advice | For Barnet residents: Barnet Homes, Tel: 02083594797(Monday to Friday 9am- 5pm) or 0208 359 2000 (Out of hours) Email: housingadvice@barnethomes.org |
| Barnet Safeguarding Children Partnership | bscp@barnet.gov.uk |

Key School Contact Details

| Governors | |
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| Chair of Governors Safeguarding Governor Email:clerktothegovernors@millhill.org.uk | Mr Elliot Lipton Ms Sophie Mortimer |
| Executives and Senior Management Team | |
| Chief Executive Officer (CEO) Head of Mill Hill School Head of Belmont Head of Grimsdell Head of The Mount, Mill Hill International (MMHI) Director of Finance and Resources Director of Operations | Mr Antony Spencer Mrs Jane Sanchez Mr Leon Roberts Mrs Kate Simon Mrs Sarah Bellotti Mrs Nicky Marlow Mr Sean Ryan |
| Out of hours for referring urgent safeguard concerns regarding staff | Email the Head of the relevant School (as above). If they are absent, contact the DFR or CEO or the Chair of Governors; otherwise contact MASH |
| Designated Safeguarding Leads (DSL) | |
| Mill Hill School (MHS) | Mr James Dickin, Deputy Head (Pastoral) |
| Belmont | Mr Paul Symes, Senior Deputy Head (Pastoral) |
| Grimsdell | Ms Jenny Ticehurst, (Deputy Head) (EYFS Safeguarding Lead) |
| The Mount, Mill Hill International (MMHI) | Ms Sarah Proudlove, Deputy Head |
| Designated Teacher for Looked After Children | The DSL in each School |
| Deputy Designated Safeguarding Leads (DDSL) | |
| Mill Hill School (MHS) | Mr John Barron, Assistant Head (Sixth Form) Ms Jade Boyle, Assistant Head (Pupil Development and Wellbeing) Ms Sam Bernstein, Deputy Head (Academic) Mr John Taylor, Foundation Head of Boarding |

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| Belmont | Ms Rachel Sutherns, Head of Lower School Ms Libby Russo, Assistant Head of Wellbeing Mr James Fleet, Deputy Head (Operations and co-curriculum) |
| Grimsdell | Mrs Emily Jenner; (Assistant Head Early Years) |
| The Mount, Mill Hill International (MMHI) | Mr John Taylor (Foundation Head of Boarding) |

List of Terms/Acronyms

| | |
|--------------------|---|
| CSC | Children’s Social Care |
| DBS | Disclosure and Barring Service |
| Designated Officer | The Officer who has overall responsibility at the Local Authority for the oversight of the procedures for dealing with safeguarding allegations against |
| DfE | Department for Education |
| FGM | Female Genital Mutilation |
| ISSR | Independent School Standards Regulations |
| KCSIE | Keeping Children Safe in Education (September 2020) |
| BSCP | Barnet Safeguarding Children Partnership is responsible for setting up the new |
| MASA | Multi-Agency Safeguarding Arrangements which have replaced the Local Safeguarding Board |
| NMS | National Minimum Standards for Boarding Schools |
| TRA | Teaching Regulation Agency |
| MyConcern | MyConcern is the facility where all staff should lodge a referral to the DSL/DDSL regarding a safeguarding concern relating to a pupil |
| Every | This software is where copies of the Foundation policies can be found. Some policies can also be found on the Foundation website and the staff intranet |

Key Points of The Policy to Safeguard and Promote the Welfare of Children who are pupils at the School

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| <p>Purpose</p> | <p>To ensure that the Foundation has regard to, and is compliant with, the statutory framework for Safeguarding and Child Protection. The Policy informs Governors, staff and volunteers of the expectations upon them and the measures that must be taken to safeguard and promote the welfare of each pupil in the Foundation’s care.</p> <p>The two categories most dealt with by DSLs are children (‘at risk’) who have suffered or are likely to suffer significant harm and those who are in need of support from one or more agency or in need of early help. The Foundation, therefore, gives prominence to the handling of these categories.</p> <p>This Policy is to be read and applied in conjunction with KCSIE and other relevant Mill Hill School.</p> |
| <p>Key elements of the Policy</p> | <p>Key elements contained within this policy include:</p> <p>Definitions and signs of abuse; The role of the Designated Safeguarding Lead, the duty of governors and that of staff; Procedures to be taken in the event of a disclosure being made or a concern being raised; Referral guidelines and the role of external agencies; Procedures for dealing with allegations against staff and against pupils; Information on specific areas of focus relating to Safeguarding and Child Protection e.g. Child Missing from Education, Honour Based Violence and Female Genital Mutilation, Preventing Radicalisation, Online safety; Information on training for all staff and volunteers and the Safeguarding Code of Conduct; Record keeping, monitoring and the Governors’ Annual Review.</p> |
| <p>Summary of the definitions and signs of abuse</p> | <p>The four categories of abuse:</p> <p>Neglect -The persistent failure to meet a child’s basic physical and/or psychological needs; 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 fabricates the symptoms or deliberately induces illness in a child; Sexual abuse- Involves forcing or enticing a child/young person to take part in sexual activities, not necessarily involving high levels of violence, whether or not the child is aware of what is happening; Emotional abuse-The persistent emotional maltreatment of a child such as to cause severe and adverse effects on a child’s emotional development.</p> |

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| <p>Dealing with disclosures/ concerns</p> | <p>Steps to be taken if a disclosure is made or a concern about a child is raised: Receive- Listen to what is said and accept it. Make a note as soon as practicable; Reassure and alleviate a pupil's guilt but remember, Do not promise confidentiality; React only as far as is necessary; Do not ask leading questions or start your own investigation; Record very brief notes at the time on any paper and write them up as soon as possible. Do not destroy the original notes. Draw diagrams, if appropriate. Record facts and observable things; Refer using the Foundation's Safeguarding and Child Protection procedures- pass onto the appropriate person but if in doubt, seek guidance from the Designated Safeguarding Lead (DSL) Remember to seek help for yourself if you are affected and only share your knowledge with the appropriate professional colleagues.</p> |
| <p>Whistleblowing (Raising concerns for professional reasons)</p> | <p>All staff and volunteers must report to the Designated Safeguarding Lead (DSL) any concerns or allegations about Foundation/School practices which are likely to put pupils at risk of abuse or other serious harm. Any concern with the behavior of colleagues or allegation made against a member of staff or volunteer, or the DSL, should immediately be reported as follows: Staff attached to a Foundation School should inform the Head of the School or, if the Head is absent, the CEO; Support staff working for the Foundation should inform the DFR or, if the DFR is absent, the CEO; If the allegation is against the Head or DFR, the member of staff must inform the CEO; If the allegation is against the CEO, the member of staff must inform the Chair of the Court of Governors.</p> |
| <p>Review by the Head and Governors</p> | <p>The Heads of each school in the Foundation will monitor the operation of this policy and the effectiveness of its procedures, taking into account any improvements advised by the Governors or external agencies, where appropriate. The Court of Governors will undertake a thorough annual review of this policy. The named Governor responsible for overseeing Safeguarding and Child protection will lead the review and will present an annual report to the Court of Governors at its December meeting.</p> |

The above Key Points are a synopsis and are not intended to replace the policy. The full policy must be read and followed in the event that it needs to be applied. If the Key Points are found to be in conflict with the wording of the full policy, the policy takes priority.

1. Statement

The Mill Hill School Foundation (the 'Foundation') fully recognises its responsibilities for child protection and safeguarding. This Policy covers Mill Hill School, Belmont Mill Hill Preparatory School, Grimsdell Mill Hill Pre-Preparatory School and The Mount, Mill Hill International. The Foundation policy applies to all pupils at the four schools including those in the EYFS and all staff (whether employed full-time or part-time or contracted and volunteer) working in the four schools and to the appointment of Members of the Court of Governors of the Mill Hill School Foundation.

Safeguarding and promoting the welfare of children is defined by **Keeping Children Safe in Education, September 2020** as:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health of 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

It is our intention that every pupil should feel safe and protected from any form of abuse: including neglect, non-accidental physical injury, sexual exploitation or emotional ill treatment, and radicalisation.

The Foundation regards the Policy to Safeguard and Promote the Welfare of Children who are pupils at the Foundation (the 'Policy') as integral to the effective discharge of its duties and responsibilities. The Court of Governors recognises its legal responsibility for undertaking an annual review of this Policy and of the efficiency with which the related duties have been discharged and has determined that as part of this annual review that it will receive and carefully consider an Annual Report on the Policy and the efficiency with which the procedures have been carried out. This Annual Report will be produced by the named Governor responsible for overseeing the implementation of this Policy following interview with the Heads, Designated Safeguarding Leads (the 'DSL') and other relevant members of staff which will be recorded in writing. This Report will include consideration of how the children at the schools may be taught about safeguarding through the curriculum and the Foundation's Personal, Social and Health Education including Online Safety.

The Court of Governors will conduct its annual review, based on the findings of the Report, in order to ensure that all members of the Court of Governors, as part of their legal responsibilities, are satisfied that the Policy is fully appropriate and compliant, and that the related duties have been discharged fully and efficiently. The discussions at the Court of Governors will be minuted in sufficient detail to demonstrate the depth of the annual review and to show the outcomes of the review. In addition, further review of the policies and procedures will be undertaken by the Court of Governors whenever required to ensure compliance with new legislation or updated best practice guidelines or legislation.

The Governors recognise also their responsibility to ensure that the staff have the skills, knowledge including ensuring that staff have the information they need about the child's status, contact arrangements with parents, care arrangements and delegated authority to carers and information available to the DSL. There should be a minimum of two emergency contact numbers available for all pupils within the Foundation. The Governors recognise also their duty to ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

The Foundation recognises that its Schools and their staff form part of a wider safeguarding system for children; that safeguarding and promoting the welfare of children is the responsibility of everyone who comes into contact with children and their families and carers; and that to fulfil this responsibility effectively that a child-centered approach to safeguarding is required and what is in the best interests of the child should be considered at all times. All staff should be prepared to identify children who may benefit from early help in accordance with Working Together to Safeguard Children (2018).

The two categories most dealt with by DSLs are children ('at risk') who have suffered or are likely to suffer significant harm and those who are in need of support from one or more agency or in need of early help. The Foundation, therefore, gives prominence to the handling of these categories.

This Policy is available to all pupils, parents, prospective parents, members of staff and volunteers by its publication on the website of each of the four Foundation Schools and it is available in hard copy, upon request to the School Office at each of the four Schools. In addition, copies of the Policy may be inspected at any point in the School day in the School Offices. It is also available to any adults working in the Foundation on the staff intranet, Firefly, and in the Policies section of Every and to any pupils, including boarders and those in positions of responsibility.

This Policy has regard to the statutory guidance issued by the Department for Education (the 'DfE') in Keeping Children Safe in Education (September 2020) (the 'KCSIE') and operates in accordance with the London Borough of Barnet and other locally agreed inter-agency procedures. It is compliant with The Revised Prevent Duty Guidance for England and Wales 2019, The Prevent Duty: Departmental advice for schools and childcare providers (June 2015), The use of social media for on-line radicalisation (July 2015), Working together to Safeguard Children (2018), Disqualification under the Childcare Act (June 2006 – August 2018), Mental Health and Behaviour in Schools (May 2018), Counselling in Schools; a blueprint for the future (February 2016) and the Statutory Framework and Practice Guidance for the Early Years Foundation Stage (the 'EYFS'). These guidance documents are available on the staff intranet, Firefly, and in the Policies section of Every.

All staff have a duty to safeguard the welfare of pupils at the Foundation and must therefore familiarise themselves and comply at all times with this Policy and have read at least Part 1 of KCSIE and Annex A.

This includes a duty both to children in need and to children at risk of harm. All staff should be aware that child protection incidents can happen at anytime and anywhere and are required to be alert to any possible concerns. The Governors recognise their duty to ensure that mechanisms are in place to assist staff to understand their role and responsibilities as set out in Part 1 of KCSIE and Annex A.

This Policy is to be read and applied in conjunction with KCSIE and other relevant Mill Hill School Foundation Policies including:

- Recruitment, Selection and Disclosure Policy and Procedure,
- The Acceptable Use of Technology and Online Safety Policy
- Guidance for Pupils on Acceptable Use of Technology and Online Safety (currently under review)
- The Policy on the Restraint of Pupils
- The School's Anti-Bullying Policy
- The School's Missing Child Policy
- The Taking, Storing and Using Images of Children policy
- Searches Guidance
- Promoting Positive Behaviour Policy

The Foundation defines a member of staff as: Any person working (either permanently or temporarily) at the Foundation whether under a contract of employment, under a contract for services or otherwise than under a contract as set down by the DfE. Staff includes teachers, peripatetic teachers and coaches, trainee teachers, teaching assistants, part-time staff, graduate assistants, administrative staff, caretakers and other ancillary staff, staff appointed from overseas and pupils paid to work at the Foundation. However, in accordance with KCSIE the Foundation recognises that a proportional risk based approach must be taken with regard to the level of information that is provided in training to temporary staff and volunteers. The Foundation recognises that the arrangements for volunteers will vary by individual and activity. The Foundation considering the appointment of a volunteer will assess whether a volunteer will be in regulated activity and will undertake safer recruitment checks having regard to DfE guidance and, in particular, KCSIE. The Foundation will only employ past pupils or use past pupils as volunteers if more than 3 years has elapsed since the pupil left the Foundation.

Each of the Foundation Schools has appointed a Safeguarding team, comprising a DSL and Deputy DSL(s) to act in the DSL's absence, with the necessary status and authority who will take responsibility for matters relating to child protection and welfare. The responsibilities of the DSL and their deputies at each Foundation School are detailed in the role-holder's job description. The DSL and their deputies will have received appropriate training in child protection and inter-agency working and attend refresher training at two yearly intervals. One member of the Executives of the Foundation oversee the Foundation Safeguarding team, with whom they meet regularly to review Safeguarding in each school.

2. Definitions of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing 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 (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and can often overlap with one another.

There are four categories of abuse:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example the NSPCC website ([https:// www.nspcc.org.uk/preventing-abuse/child- abuse-and-neglect/](https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/)) offers information for schools and colleges on types of abuse and what to look out for which staff are encouraged to refer to. Other professional organisations that provide up-to-date guidance and practical support on specific safeguarding issues are the TES and MindEd websites. The DfE also provides advice on identifying the signs of child abuse in 'What to do if you are worried a child is being abused – Advice for Practitioners' which may be found at :

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>. **Schools and colleges** can also access broad government guidance on the specific safeguarding issues listed below via the GOV.UK website:

- Child missing education
- Child missing from home or care
- Child sexual exploitation
- Peer on Peer abuse (to include bullying, cyberbullying, sexting, sexual violence and sexual harassment)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls
- Hate
- Mental health
- Missing children and adults strategy
- Private fostering
- Preventing Radicalisation
- Serious Violence
- Sexting
- Relationship abuse
- Trafficking
- Upskirting

A more detailed explanation of what constitutes Abuse and its signs and symptoms is set out in **Appendix B**.

3. Aims and Objectives

The Foundation is committed to taking all reasonable measures to safeguard and promote the welfare of each pupil in its care and expects all staff and volunteers to share this commitment by:

a) Safe Recruitment

Ensuring that the Foundation practices safe recruitment procedures in checking the suitability of all staff and volunteers (including staff employed by another organisation) working with our pupils having regard to the guidance given in KCSIE, the National Minimum Standards for Boarding Schools (the 'NMS'), the requirements of the Code of Practice published by the Disclosure and Barring Service (the 'DBS') and in compliance with the Independent School Standards Regulations (the 'ISSR').

The Foundation's recruitment policies are set out in detail in the Mill Hill School Foundation Recruitment, Selection and Disclosure Policy. This Policy provides for the appropriate checks to be carried out to confirm the suitability of a member of staff for appointment which shall include:

- satisfactory checks concerning identity, medical fitness, right to work in the UK, previous employment history, character references, professional references (where appropriate) and qualifications (where appropriate);
- satisfactory completion of an enhanced disclosure with barred list information or an enhanced disclosure check for regular volunteers and others as required, such as third party employees, by the DBS. The DBS disclosure certificate which is the subject of the application is obtained before appointment;
- in the case of any person for whom, by reason of living or having lived outside the UK, obtaining such a certificate is not sufficient to establish suitability to work in a school, such further checks are made as the Foundation considers appropriate, having regard to the guidance given in KCSIE, in the DfE Guidance on the employment of overseas-trained teachers and any other guidance issued by the Secretary of State; in accordance with DBS guidelines the DBS disclosure certificate must be obtained before or as soon as practicable after appointment. The original DBS disclosure certificate must be provided to the Foundation within one week of it being received by the applicant. Original certificates must not be sent by post but must be brought to the Foundation in order that it may be checked. If the applicant is unable to attend to provide the certificate he or she must provide a certified copy by post or email within two weeks of receiving the original disclosure certificate. Where a certified copy is sent the original disclosure certificate must be provided either prior to or on the first day of work;
- satisfactory check that anyone employed as a teacher is not subject to a Prohibition Order issued by the Secretary of State;
- satisfactory check that anyone employed in management positions is not subject to a 'section 128' direction. The Foundation considers a management position to include the Head, members of a School Senior Management Team (including non-teaching staff), Teaching positions with departmental headship, those with line management responsibilities and the Chair of Governors.

- Ensuring that we carry out all necessary checks on the suitability of people who serve as volunteers, including on the Foundation's Court of Governors, in accordance with the above regulations and guidance given in KCSIE, the Education (Independent School Standards) (England) Regulations 2014 as amended, the NMS and the requirements of the DBS.
- Ensuring that where the Foundation ceases to use the services of any person (whether employed, contracted, a volunteer or pupil) because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS. This report will be made within one month of the person leaving the Foundation. The Foundation considers that 'ceasing to use' includes: dismissal; non-renewal of a fixed term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.
- Ensuring that where staff from another organisation are working with our pupils on another site, we have received assurances in writing that appropriate child protection checks and procedures apply to those staff.

b) Safeguarding Procedures

- Protecting each pupil from any form of abuse, whether from an adult or another pupil.
- Creating an environment where staff and volunteers feel able to raise concerns and feel supported in their safeguarding role, including the understanding that any member of staff or volunteer may make a referral to an external agency.
- Having an awareness of safeguarding issues some of which are listed above in definitions of Abuse.
- Being aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.
- Being alert to signs of abuse both in the Foundation and from outside, including being aware that children are capable of abusing their peers and can give rise to safeguarding issues which are most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting.
- Ensure that sufficient account has been taken of guidance and advice relating to the specific safeguarding issues identified in KCSIE with regard to the nature, age range and other significant features of the Foundation's individual Schools.
- Working with other professionals and agencies to ensure that the Foundation fully discharges its responsibilities to provide additional support for children in need, supporting a pupil with emotional or mental health issues, children at risk:
 - Children in Need
 - Pupils with emotional and mental health issues
 - Children at risk
 - Children with Special Education Needs or Disabilities (SEND)
- Establishing a safe environment in which children can learn and develop and ensure that Foundation premises are as secure as circumstances permit.

- Raising awareness of safeguarding and child protection issues, including e-safety and the safe use of social networking sites, and equipping pupils with the skills needed to recognise and keep them safe from abuse, as part of the PSHE curriculum, assemblies and tutor periods.
- Having clear procedures in place for identifying and reporting suspected cases of abuse and which promote this Policy.
- Supporting any pupil who has been abused, in accordance with his or her agreed protection plan.
- Creating an environment where children know they can approach adults, are encouraged to talk, and are listened to.
- Ensure there are procedures in place that help to minimise the risk of peer on peer abuse; including clear guidelines of how allegations of peer on peer abuse will be investigated and dealt with; as well as clear processes as to how victims, perpetrators and any other child affected by peer on peer abuse will be supported.
- Being alert to the medical needs of children with medical conditions.
- Operating robust and sensible Health and Safety procedures.
- Operating clear and supportive policies on drugs, alcohol and substance misuse. Considering and developing procedures to deal with any other safeguarding issues which may be specific to individual children in our School or in our local area.
- Undertaking to follow the procedures set out in KCSIE and to have regard to guidance issued by the Secretary of State for the Department for Education in accordance with section 157 Education Act 2002 and associated regulations.
- Every complaint or suspicion of abuse from within or outside the Schools will be dealt with according to the London Child Protection Procedures (March 2020 at time of writing but another update is due in September) (and its 6 monthly updates), will be investigated and in all proper circumstances will be referred to an external agency, such as Barnet or other relevant Local Authority Children's Social Care (the 'CSC'), or the child protection unit of the Police (the 'CPU'), in accordance with the procedures published by the Barnet Child Protection Team.

The Foundation Undertakes to:

- The Foundation has procedures in place to make a referral via the relevant Head to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been, had they not resigned.
- Ensure Safer Recruitment Procedures are always followed according to the DfE guidance, KCSIE and DBS guidelines.
- Ensure that in each School there is a DSL for child protection who has received appropriate training and support for this role. At Grimsdell this will be the DSL for EYFS.
- Ensure that in the event that the DSL for child protection at the School is not available then either a Deputy DSL or a DSL for child protection at one of the other Foundation Schools will be available to receive and deal with any concerns.
- Ensure there is a nominated Governor to take leadership responsibility for safeguarding and child protection arrangements and the prevention of radicalisation.
- Ensure all members of staff and volunteers, including Governors, know the name of the DSLs and their role.

- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and reporting arrangements for referring any concerns to the DSL responsible for child protection and that mechanisms are in place to assist staff to understand their role and responsibilities as set out in Part 1 of KCSIE.
- Ensure parents, through the publication of this policy and other similar means, have an understanding of the responsibility placed on the Schools and staff and volunteers for child protection.
- Recognise the importance of information sharing between professionals and local agencies and to develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters including attendance at case conferences.
- Notify CSC if there is an unexplained absence of a pupil who is on the Child Protection Register
- Notify the DBS of any member of staff or volunteer, (whether current or having recently left the employ of the Foundation), about whom there is a concern regarding his or her attitude or actions towards pupils.
- Where relevant and in accordance with their Prevent Duty, the Foundation Schools will co-operate with the Channel panel and the Police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The Foundation schools will respond to requests for information from the Police promptly and in any event within 5 to 10 working days.
- Ensure that the safeguarding arrangements being followed reflect local protocols for assessment and MASA's threshold document and to provide information as requested by MASA or BSCP.

4. The Designated Safeguarding Lead (DSL)

The DSL at each Foundation school will take lead responsibility for child protection and the prevention of radicalisation. The DSL should be given the time, funding, training, resources and support they need to carry out the role effectively.

The DSL will direct and provide advice and support to staff members in carrying out their safeguarding duties and the prevention of radicalisation and will liaise closely with other safeguarding services and agencies. The DSL may delegate some responsibilities to one or more DDSLs however ultimate lead responsibility for safeguarding and child protection, including the prevention of radicalisation, should not be delegated.

The Designated Safeguarding Leads (DSL) for each Foundation School will have responsibility for e-safety in their school. This responsibility will include leading online safety meetings; working to ensure that the Foundations systems to protect pupils are reviewed and improved; reviewing and logging reports of online safety incidents; reporting to the SMT/Head of their school and co-ordinating training for pupils, staff, governors and parents to improve understanding of all aspects of online safety

The DSL or Deputy Designated Safeguarding Lead (DDSL) will always be available to discuss safeguarding concerns about welfare and safeguarding matters. During term time, the DSL and/or DDSL will always be available (during school hours) for staff in the Foundation to discuss any safeguarding concerns. For out of hours/out of term activities, contact your relevant DSL/DDSL or call MASH on 0208 359 4066 / 0208 359 2000.

The DSL will liaise with the Local Authority and work with partner agencies to seek advice, support and guidance, drawing on multi-agency expertise, knowledge and experience to support a pupil at risk of harm, including emotional well-being. The DSL will take prompt action where there are concerns that a pupil may be in need of help or is at risk of harm, and make prompt contact with the Local Authority or other agency, including the Police.

The focus of each of the Foundation Schools and their DSL is to support pupils in need through seeking early help and/or inter agency working and to be alert to the specific needs of pupils in need, those with special educational needs and young carers.

The DSL at each school in the Foundation is:

- **Mill Hill School:**
Mr James Dickin, Deputy Head (Pastoral)
- **Belmont:**
Mr Paul Symes, Senior Deputy Head (Pastoral)
- **Grimsdell:**
Mrs Jenny Ticehurst, Deputy Head and EYFS Safeguarding Lead
- **MMHI:**
Ms Sarah Proudlove, Deputy Head

If the DSL is absent, such as through illness, his or her duties will be carried out by a Deputy DSL. The DDSL will be trained to the same standard of the DSL and will have received appropriate training in child protection and inter-agency working and attend refresher training at 2-yearly intervals. The Deputy DSL for each School in the Foundation is as follows:

- **Mill Hill School:**
Mr John Barron, Assistant Head (Sixth Form); Ms Jade Boyle, Assistant Head (Pupil Development and Wellbeing) Ms Sam Bernstein, Deputy Head (Academic) and Mr John Taylor (Foundation Head of Boarding)
- **Belmont:**
Ms Rachel Sutherns, Head of Lower School; Libby Russo, Assistant Head of Wellbeing and James Fleet, Deputy Head (Operations)
- **Grimsdell:**
Mrs Emily Jenner, Assistant Head, EYFS
- **MMHI:**
Mr John Taylor (Foundation Head of Boarding)

All the DSLs and DDSLs form part of the Foundation Safeguarding Team and work collaboratively together. Pupils may ask to speak to a DSL/DDSL of their own gender and such request will be accommodated whenever reasonably practicable.

If the DSL is the subject of a complaint the DSL duties will be carried out by the Head. The Head will have received appropriate training in child protection and inter-agency working and attend refresher training at 2-yearly intervals.

The DSL will:

- Hold a copy of KCSIE and local area Safeguarding and Child Protection Procedures (London Child Protection Procedures).
- Undergo training to provide them with the knowledge and skills required to carry out their role. Advanced Safeguarding Training (previously Level 3) should be updated at least every two years. The DSL should also complete safer recruitment training every five years and undertake Prevent awareness training. The DSL will refresh their knowledge and skills at regular intervals, as required, and, at least annually, to allow them to understand and keep up with any developments relevant to their role.
- Be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies (such as MASA) in all matters of child protection except for allegations against staff, volunteers and the DSL which should be reported to the Head of the School where the member of staff, volunteer or DSL is employed.
- Co-ordinate the child protection procedures in the School.
- Support staff in carrying out their safeguarding duties and monitor the effectiveness of the Foundation's policies and procedures in practice.
- Maintain an ongoing training programme (updated every two years) for the Head and Deputy DSL and (every three years) for all staff and volunteers who work with children so that they are made aware of these arrangements and their responsibilities.
- Keep written records of concerns about children, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely, separately from the main pupil file, on MyConcern or in a locked location.
- Ensure all staff and volunteers read KCSIE Part 1 guidance plus Annex A and that mechanisms are in place to assist staff to understand their role and responsibilities as set out in Part 1 of KCSIE.
- Follow procedures where an allegation is made against a member of staff or volunteer as directed by the Head of the School where the member of staff or volunteer is employed.
- Ensure that the Foundation's safeguarding policy and procedures are known, understood and used appropriately by all staff and that staff are updated and reminded about such policies.
- Work with the Foundation DSLs to identify the training needs of Foundation staff, parents and pupils, ensuring that they have access to relevant and up to date safeguarding training through the schools INSET programme/parent/pupil workshops.
- Ensure that all members of Foundation staff have been trained and that new members of staff are trained in the use of MyConcern for making referrals of safeguarding concerns relating to pupils and on how to manage a report of child on child sexual violence/harassment.
- Ensure that the Foundation's safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the Foundation in this.
- Forge links with the Local Authority to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

- Ensure that, where a pupil on the child protection register leaves, the information is transferred (separately from the main pupil file) to the new school immediately and that the pupil's social worker is informed. The DSL will ensure secure transit of the pupil's child protection file to their new school and will obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a pupil leaving.
- Liaise with the child protection officer appointed by the Children's Social Care (CSC) (Local Authority Designated Officer (the 'Designated Officer')), co-ordinate action with CSC and (where applicable) the Police following any child protection allegation or suspicion against a member of staff or volunteer at the Foundation involving a day or boarding pupil.
- Liaise with the BSCP and MASA following any child protection allegation or suspicion against a person who is not a member of the School staff or volunteer.
- Inform the applicable Local Authority of any pupil missing from education.
- Report to the Police cases where they discover that FGM appears to have been carried out on a girl under 18 years of age which is a mandatory reporting duty.
- Ensure that the Foundation has due regard to the need to prevent people from being drawn into terrorism, assessed the risk of children being drawn into terrorism, clear procedures in place for protecting children at risk of radicalisation and established clear protocols for ensuring any visiting speakers are suitable and appropriately supervised.
- Ensure that, where appropriate, senior pupils given positions of responsibility (such as monitors, prefects and house prefects) over other pupils are briefed on appropriate action to take should they receive any allegations of abuse.
- Advise and act upon all suspicion, belief and evidence of abuse reported to him or her.
- Keep the Head of the School informed of all actions unless the Head is the subject of a complaint.
- Liaise with the CSC and other agencies on behalf of the Foundation.
- In the case of the DSL for Grimsdell (EYFS section) he or she will also, apart from taking lead responsibility for safeguarding children in the EYFS setting, liaise with local statutory children's agency of the London Borough of Barnet as appropriate.
- Work with the Foundation DSLs and the Designated Governor for Safeguarding to review and update the Foundation's safeguarding policy.
- Regularly review their School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- Understand the importance of information sharing, both within the Foundation and with MASA, other organisations and practitioners.
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep pupils safe whilst they are online at the Foundation.
- Can recognise the additional risks that pupils with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND pupils to stay safe online.

- Work with the Foundation Head of PSHEE and RSE to deliver a curriculum that helps educate children about safeguarding and how to protect themselves both on and off online. This education will flow through the Foundation.
- DSL's should help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker are experiencing, or have experienced, with teachers and the relevant school Senior Leadership Teams.
- Encourage a culture of listening to pupils and taking account of their wishes and feelings, among all staff, in any measures the Foundation may put in place to protect them.

Ms Sophie Mortimer is the named Governor delegated by the Court of Governors to take leadership responsibility for safeguarding arrangements including the implementation of this Policy. She is also responsible for the oversight of the safeguarding and prevention of radicalisation procedures and their implementation, and presenting an annual Report jointly with the DSLs, such Report to be prepared following consultation with the Heads and DSLs from each of the four Foundation Schools, to the Court of Governors on the Foundation's safeguarding, child protection and prevention of radicalisation policies and of the efficiency with which the related duties have been discharged. This annual Report will form part of the Court of Governors' annual review, which is undertaken to ensure that all members of the Court of Governors, as part of their legal responsibilities, are satisfied that the Policy is fully appropriate and compliant, and that the related duties have been discharged fully and efficiently. The named Governor and Chair of Governors are trained in Safer Recruitment and Advanced Child Safeguarding (formerly Level 3 Training in Multi-Agency Working Incorporating Level 2 the Role of the DSL). All remaining Governors should complete online safeguarding Level 1 training every 2 years and have an annual safeguarding update by a DSL. All Governors should reference regular briefings and updates on Preventative and FGM. In addition, those Governors who are involved in recruitment within the Foundation should complete Safer Recruitment training at least once in every 5 years.

5. Duty of Staff

Every member of staff and volunteer in each School is under a general legal duty:

- to protect children from abuse and keep pupils safe
- to be aware of the Foundation's and their School's child protection procedures and to follow them; to have read KCSIE Part 1 and Annex A; and to be familiar with the latest statutory guidance and regulations
- to know how to implement the procedures
- to keep a full record of any significant complaint, conversation or event. All evidence (for example, scribbled notes, mobile phone text messages, clothing computers) must be safeguarded and preserved
- to report any matters of concern (suspicions or complaints of abuse) to the DSL or, if the complaint involves the DSL or an allegation is made against a member of staff or a volunteer, to the Head of the School where the member of staff or volunteer is employed
- to undertake appropriate training, including refresher training, at 3 yearly intervals
- to ensure their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil, for example, in one-to-one tuition, sports coaching and conveying a pupil by car

- to notify the Head of the School immediately if they are aware of anything that may affect his/her suitability to work with children or there are any reasons why they should not be working with children. This includes notification of any convictions, cautions, court orders, reprimands or warnings the member of staff may receive.
- to inform the Head of the School immediately if they are disqualified from childcare or registration
- to comply with the provisions of the Staff Code of Conduct.

6. Whistleblowing (Raising Concerns for Professional Reasons)

In accordance with the Independent School Standards Regulation 3 (2) (b) which requires compliance with KCSIE and the NMS, the Foundation recognises the requirement for the policy to include a section on 'Raising Concerns for professional reasons (whistleblowing)'.

All staff (including supply staff) and volunteers are required to report to the DSL any concern or allegations about Foundation practices which are likely to put pupils at risk of abuse or other serious harm. Any concern with the behaviour of colleagues or allegation made against a member of staff or volunteer or the DSL should immediately be reported as follows:

- A. Staff attached to a Foundation School should inform the Head of the School or, if the Head is absent, the CEO;
- B. Support staff working for the Foundation should inform the DFR or, if the DFR is absent, the CEO;
- C. If the allegation is against the Head or DFR, the member of staff must inform the CEO;
- D. If the allegation is against the CEO, the member of staff must inform the Chair of the Court of Governors. of the Mill Hill School Foundation who will immediately pass the allegation to the DSL without notifying the Head first.

Staff and volunteers have the right to make direct referrals to the Local Authority or Ofsted or the Channel Police Practitioner. There will be no retribution or disciplinary sanction taken against a member of staff for making such a report provided that it is done in good faith.

7. Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the Foundation and/or can occur between children outside the Foundation This is known as contextual safeguarding, which simply means assessments of pupils should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. **All** staff, but especially the DSL or DDSL should consider whether children are at risk of abuse of 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.

Pupil's social care assessments should consider such factors so it is important that the Foundation provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse,

8. Procedures

Any member of staff, volunteer, visitor or another adult suspecting or hearing a complaint of abuse must:

- Take into account the procedures set out in Appendix D.
- Listen carefully to the pupil and keep an open mind. He or she should not form a decision as to whether or not the abuse has taken place.
- Not ask a leading question, i.e. a question that suggests its own answer.
- Reassure the pupil but not give a guarantee of absolute confidentiality. The member of staff or volunteer should explain they have to pass the information to the DSL or to the Head of the School or to the Chair of the Court of Governors, as appropriate in accordance with this Policy, who will ensure the correct action is taken.
- Refer their safeguarding concern to the DSL/DDSL of their School, as soon as possible. Referrals to the DSL or DDSL can be made using MyConcern, where the member of staff has access to a computer, in writing or in person. Speak, as soon as possible, with the DSL to agree a course of action although staff can make a direct referral to CSC.
- If staff (including governors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff should challenge any inaction and follow this up with the DSL and CSC as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names and not initials. The record must be kept securely and handed to the DSL unless it involves the Head or a member of Staff, including the DSL. If the allegation is made against the DSL or another member of staff or volunteer the record must be handed to the Head of the School or the DFR, if the Head or DFR are absent, the allegation should be passed directly to the CEO of the Mill Hill School Foundation.
- Preserve and safeguard all evidence, for example scribbled notes, mobile phones containing text messages, clothing and computers.
- Should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing
- Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or DDSL).

The named Governor and Chair of the Court of Governors may be contacted through the Clerk to the Governors at clerktothegovernors@millhill.org.uk.

9. Action taken by the DSL

The action to be taken will take into account:

- The procedures set out in Appendix D
- A complaint involving a serious criminal offence will always and within 24 hours be referred to the CSC or the Police without further investigation within the Foundation.
- It is important to ensure that even allegations that appear less serious are followed up and taken seriously, and that they are examined objectively by someone independent of the school. Consequently, the Designated Officer should be informed of all child protection allegations or suspicions against a member of staff or volunteer at the Foundation that come to the DSL's attention and appear to meet the criteria for referral, so that he or she can consult Police and social care colleagues as appropriate. Any child protection allegation or suspicion against anyone outside the Foundation will be referred to the MASA. The relevant criteria are that one or more persons have: behaved in a way that has caused a child to suffer or are at risk of suffering serious harm to a child or may have caused serious harm to a child; or possibly committed a criminal offence against or related to a child; or behaved towards a child or children in a way that indicates that they are unsuitable to work with children.
- When deciding whether to make a referral, following an allegation or suspicion of abuse, the Head and DSL should not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the Designated Officer or MASA. This may be done tentatively and without giving names in the first instance. What appears trivial at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus the Foundation should not do anything that may jeopardise a Police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse, but should discuss their doubts and concerns with the Designated Officer or LCSB on a no names basis without identifying the family. If the Designated Officer or LCSB advises that sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay. If the initial referral is made by telephone, the DSL will confirm the referral in writing to CSC within 48 hours. If no response or acknowledgment is received within one working day, the DSL will contact CSC again.
- The wishes of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes.
- The wishes of the complainant's parents provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before making a decision to disclose.
- Duties of confidentiality, so far as applicable.
- Not to take any action that may jeopardise a Police investigation, such as asking a child leading questions or attempting to investigate the allegation of abuse (see 'What To Do If You're Worried a Child is Being Abused' Guide for Practitioners March 2015).
- To reassess the concerns following action when the situation does not improve for the child and, where appropriate, challenge inaction by external agencies.

- Take into account, where relevant, local information sharing protocols relating to Channel referrals.

10. Referral Guidelines

The DSL and Deputy DSL and members of the Foundation staff must have regard for the criteria set out in KCSIE when determining whether to make a referral to CSC or MASA as appropriate where a pupil or another person has:

- Behaved in a way that caused a child to suffer or are at risk of suffering serious harm Or
- Possibly committed a criminal offence against or related to a child. Or
- Behaved towards a child or children in a way that indicates he or she is unsuitable to work with children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (Transferable risk). For example, an incident of domestic abuse.

Or

- If there are concerns about a child's welfare and there are signs that a child:
 - is experiencing or may already have experienced abuse or neglect;
 - is likely to suffer significant harm in the future.

In considering a referral the DSL will differentiate between safeguarding children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies. A referral should be made within one working day of the recognition of risk.

A child who is considered to be in immediate danger or to have suffered or is at risk of suffering serious harm will be referred to CSC and/or the Police immediately. Anyone can make a referral.

Where a member of staff other than the DSL makes a referral to the Local Authority or other external agency, including the Police, the member of staff should inform the DSL, or in the absence of the DSL, the DDSL or Head, as soon as possible thereafter.

The Local Authority should make a decision within one working day of a referral being made as to the course of action they are taking and should advise the referrer. Where the outcome of a referral is not reported to the referring member of staff or DSL and/or where the child's situation does not appear to be improving, the DSL (or the referring member of staff) will follow this up with the CSC and press for reconsideration to ensure that their concerns have been addressed and the child's situation improves. Any member of staff who has concerns that a child's situation does not appear to be improving should press for reconsideration.

A child who is considered to be in need of additional support from one or more agencies will be referred to one or more external agencies as required and an inter-agency assessment using local processes will be sought. In such situations the parents will be kept fully informed, as appropriate.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example considering the provision of pastoral and/or academic support, alongside action by statutory services).

The safety of children is paramount in all decisions in relation to the welfare of children and members of the Foundation staff should take all reasonable steps to offer a child immediate protection from an aggressive parent. The Foundation will not do anything to jeopardise any external investigation. Once a referral has been made, all further responsibility for gathering information and deciding on actions to be taken will rest with the appropriate external agency, such as the Social Services and the Police.

An allegation against a member of staff or volunteer will be discussed with the Designated Officer whose advice will be followed. A referral to the CSC or Police of a child protection allegation or suspicion against a member of staff or volunteer at the School will not normally be made where the case is one which, upon the advice of the Designated Officer, can be satisfactorily investigated and dealt with under the School's internal procedures. In such situations additional support from one or more external agencies will be sought and the parents will be kept fully informed, as appropriate.

A referral to MASA or Police of a child protection allegation or suspicion against a person who is from outside the School and not a member of staff or volunteer at the School will be made and the advice of MASA followed.

A complaint or suspicion of abuse involving the identification of someone who may already be engaged in illegal terrorist-related activity, will always be referred to CSC and, if appropriate, the Police.

In relation to Channel referrals, the DSL will consider seeking the consent of the child (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

11. Reporting to the Police

Any report to the police will generally be in parallel with a referral to children's social care (as above) it is important that the DSLs' are clear about the local processes for referrals and follow that process. Where a report has been made to the police, the Foundation will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

In circumstances where parents or carers have not been informed, it will be especially important that the Foundation is supporting the child in any decision they take. This should be with the support of Children's Social Care and any appropriate specialist agencies.

When deciding whether to call the police the DSL will consult the following guidance. When to Call the Police, Guidance for Schools and Colleges 2020 <https://www.safe4me.co.uk/wp-content/uploads/2020/02/CYP-schools-guide.pdf>

12. Early Help

Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and/or has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn in to anti- social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the MASA referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

Where appropriate, the DSL or the Head of the School may consult with the pupil concerned and his/her parents regarding a referral to one or more external agency, such as the CSC. Once this has been determined for a pupil, the DSL will support the member(s) of staff involved in liaising with the agencies and setting up an inter-agency assessment as appropriate. This may lead to a written plan to support the pupil in need being drawn up or an early help assessment being carried out.

13. External Agencies

Whether or not the Foundation decides to refer a particular complaint to the CSC or the Police, the parents and pupil will be informed in writing of their right to make their own complaint or referral to the CSC or the Child Protection Unit of the Police and will be provided with contact names, addresses and telephone numbers, as appropriate.

External Agencies telephone contact details:

- The Children's Social Care Department of the London Borough of Barnet - 0208 359 2000;
- Listening to Children Division of the London Borough of Barnet – 0208 359 4489;
- The Designated Officer – 0208 359 4528 or 0790 358 2861;
- Local Authority Housing Advice - For Barnet residents : Barnet Homes, Tel: 0208 359 4797 (Monday to Friday 9am-5pm) or 0208 359 2000 (Out of hours) Email: housingadvice@barnethomes.org
- Crime stoppers: 0800 555 111;

- Local Police: 101

Other External Agencies for reporting Prevent concerns relating to terrorism and extremism are as follows:

- DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and Governors regarding extremism and the prevention of radicalisation - 020 7340 7264 or counter-extremism@education.gsi.gov.uk.
- Anti Terrorist hotline: 0800 789 321;
- www.gov.uk/report-suspicious-activity-to-mi5;
- www.gov.uk/report-terrorism.

14. Boarding Pupils

As there are boarding pupils at the Foundation the Governors recognise that appropriate provision should be made in the Foundation policies to ensure that staff are alert to pupil relationships and the potential for peer abuse in residential settings and for responding to these issues. The requirements under the NMS apply to this policy.

- In accordance with the NMS, the Foundation will ensure that:
 - Senior pupils who are given positions of responsibility over other pupils are appropriately briefed on the appropriate actions to take should they receive any allegations of abuse. The responsibility for organising these briefings and for ensuring that they occur on a regular basis resides with the Deputy Head (Pastoral) at Mill Hill School;
 - The School's Missing Child Policy is known to staff and used in practice. This policy includes details of how a child who is believed to be missing should be searched for and, if necessary, reported as missing from School;
 - Pupils, parents and others are not penalised for making a complaint in good faith, thus giving immunity for bona fide whistleblowing.
- The Foundation has an Independent Listener for Boarding whose details can be obtained at Reception of Mill Hill School and The Mount, Mill Hill International

15. Allegations Against Staff

The Foundation's procedures for managing allegations against staff who are currently working in the Foundation follows Department for Education statutory guidance and MASA arrangements and applies when staff (including supply teachers and volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil
- Possibly committed a criminal offence against or related to a pupil or
- Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (Transferable risk) For example, an incident of domestic abuse

The Foundation's procedures for dealing with allegations against staff (including supply teachers or volunteers who work with children) that aim to strike a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations. However, the Foundation must consider the following when assessing its actions:

- If the pupil is at risk?
- Are other pupils are at risk?

- Will the member of staff's presence in the School where they work impede an investigation? Suspension will not be an automatic response to an allegation.
- Where a member of boarding staff or a member of staff living in Foundation accommodation is suspended pending investigation, the Foundation will undertake to provide alternative accommodation away from pupils.
- Full consideration will be given to all the options, subject to the need to ensure:
 - The safety and welfare of the pupil concerned.
 - The need for a full and fair investigation.

The Foundation is required to report to the DBS within one month of leaving the Foundation any person (whether employed, contracted, a volunteer or pupil) whose services are no longer used because he or she is considered unsuitable to work with children. The DBS address for referrals is PO Box 181, Darlington, DL1 9FA (telephone 01325 953795).

If any person (whether employed, contracted, a volunteer or pupil) is dismissed, or resigns, before a disciplinary process is completed the Head should inform the person about the employer's statutory duty to report the case to the DBS and will so inform the Authority.

If any person (whether employed, contracted, a supply teacher, a volunteer or pupil) is dismissed, or resigns, and a judgement is made that a disciplinary process would have been instituted if that person had remained in post the Head should similarly inform the person about the employer's statutory duty to report the case to the DBS and will so inform the Authority.

If a teacher has been dismissed (or would have been dismissed had he or she not resigned) following an allegation the Foundation may also inform TRA in accordance with KCSIE guidance.

If an allegation is made against a member of staff, a supply teacher or a volunteer, the member of staff receiving the allegation must immediately inform the Head of the School in which that member of staff works who will contact the DSL. If the Head is absent, the allegation should be passed directly to the CEO of the Mill Hill School Foundation.

While the Foundation are not the employer of supply teachers, the Foundation will ensure allegations are dealt with following the correct procedures. The relevant school will take the lead in any investigation as agencies do not have direct access to the children or other school staff so not being able to collect the facts (or liaise with) the LADO.

If an allegation is made against the DSL with responsibility for child protection, the member of staff receiving the allegation must immediately inform the Head of the relevant School. If the Head is absent, the allegation should be passed directly to the CEO of the Mill Hill School Foundation.

If an allegation is made against the Head or DFR, the member of staff receiving the allegation must immediately inform the CEO or if the allegation is made against the CEO the member of staff receiving the allegation must immediately inform the Chair of the Court of Governors of the Mill Hill School Foundation who will immediately consult with the Designated Officer on the allegation without notifying the Head first.

Any allegation against a member of staff or volunteer will be dealt with as quickly as possible and without unnecessary delay.

All discussions will be recorded in writing and communication with both the individual and the parents of the child will be agreed.

An allegation against a member of staff or volunteer will be discussed with the Designated Officer or may be referred directly to the Police whose advice will be followed.

The Foundation will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by CSC or the Police.

The Foundation will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

The Foundation should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The Foundation will give due weight to the views of the DSL and the provisions of the KCSIE when making a decision about suspension. Where the individual is suspended, the Foundation will ensure they know who their point of contact is in the Foundation and shall provide them with their contact details.

The Foundation will have regard to the guidance and restriction on the reporting or publishing of allegations made against teachers and make all reasonable effort to maintain confidentiality and guard against unwanted publicity. Subject to this, the Foundation will ensure that parents are informed as soon as possible and kept informed about the progress of the case, subject to any advice from CSC or the Police. These guidelines apply up to the point where the accused person is either charged with a crime or the DfE or TRA publish such information.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the Designated Officer.

On conclusion of the case, the DSL should review the circumstances of the case to determine whether there are any improvements to be made to the Foundation's safeguarding procedures or practices to help prevent similar events in the future.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

The Foundation's Safeguarding Policy can be found on its website and the staff Safeguarding Code of Conduct is annexed there to. The aim of this Policy and Safeguarding Code of Conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

16. Arrangements for Dealing with Peer on Peer Allegations Specific Categories of Peer on Peer Abuse

Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include but is not limited to:

- Abuse within intimate partner relationships
- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking biting, hair pulling or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Upskirting, which typically involves taking a picture under a person's clothing (not necessary a skirt) without their permission and or knowledge , with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alar. It is a criminal offence and anyone of any gender can be a victim.
- Sexting (also known as youth produced sexual imagery) and
- Initiation/hazing type violence and rituals.

Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours be dismissed as the same or "just having a laugh" or "boys being boys". The Foundation recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

The Foundation recognises that children with special educational needs and disabilities can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children.

The Foundation recognises that children in residential settings can be particularly vulnerable and is alert to the potential for peer- on-peer abuse.

The Foundation takes steps to minimise the risk of peer-on-peer abuse including induction and mentoring programmes; clear reporting procedures; anti-bullying policies; a robust policy promoting positive behaviour; training pupils in leadership positions and appropriate lessons as part of the Foundation PSHE curriculum and assemblies/tutor periods.

Abuse Allegation Procedures

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the Foundation's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the Foundation during the investigation. The Foundation will take advice from MASA on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the Foundation will ensure that, subject to the advice of MASA, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the Foundation and advice will be sought as necessary from MASA and/ or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, and upskirting. Rape, assault by penetration and sexual assaults will be passed to the police.

If the DSL decides to make a referral to CSC and/or a report to the Police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The Foundation's approach to sexting is that it is in contravention of the Foundation's Behaviour Policy and all incidents involving sexual imagery will be managed in line with this Policy.

In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Both victims and perpetrators will be supported by the Foundation's counsellors and pastoral care teams. Support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will 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. The risk and needs assessment should consider:

- the victim;
- the alleged perpetrator; and
- the other children (and, if appropriate, staff) at the Foundation

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

17. Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

18. 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 criminal activity for the following reasons:

- In exchange for something the victim needs or wants
- For the financial gain or other advantage of the perpetrator or facilitator
- 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 (see further information on county line) forced to shoplift or pickpocket or to threaten other young people.

19. County Lines

County lines is a term used to describe gangs and organized criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using designated phone lines or other form of “deal line”

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

If a child is suspected to be at risk of or involved in county lines, staff should follow the safeguarding referral procedure set out in this policy. The DSL will refer to local services local services/third sector providers who offer support to victims of county lines exploitation.

20. Child Sexual Exploitation (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

CSE can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. CSE does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- 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 regularly miss school or education or do not take part in education.

However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

21. Suspected Harm from Outside the Foundation

A member of staff who suspects that a pupil is suffering harm from outside the Foundation should seek information from the child with tact and sympathy using 'open' and not leading questions. A sufficient record should be made of the conversation and if the member of staff continues to be concerned he or she should follow the appropriate guidelines as set out in this policy.

22. Child Missing from Education

The Foundation recognises that a child missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect, including that a child may be at risk of radicalisation, FGM or forced marriage, and that the Foundation should help prevent the risks of them going missing in the future. Unauthorised absence will be managed in accordance with the Foundation's Missing Child Policy.

The Foundation will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/ carer.

The relevant School's DSL will inform the applicable Local Authority (within which the pupil resides when not at School) of any pupil who:

- Is going to be added to or deleted from the relevant School's admission register at non- standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).
- Fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the Foundation and the Local Authority (or in default of such agreement, at intervals determined by the Secretary of State).
- Is going to be removed from the relevant School's admission register where the pupil:
 - Has been taken out of School by the parents and is being educated outside the school system e.g. home education;
 - Has ceased to attend the School and no longer lives within reasonable distance of the relevant School;
 - Has been certified by the relevant School medical officer as unlikely to be in a fit state of health to attend School before ceasing to be of compulsory school age, and neither the pupil nor the parents has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
 - Is in custody for a period of more than four months due to a final court order and the relevant School does not reasonably believe that the pupil will be returning at the end of that period;
 - Has been permanently excluded.

The applicable Local Authority will be notified as soon as the grounds for deletion from the relevant School's admissions register are met, but no later than deleting the pupil's name from the admissions register.

This will assist the Local Authority to:

- fulfil its duty to identify children of compulsory school age who are missing from education; and
- follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

Action should be taken in accordance with this policy if any absence of a pupil from the Foundation gives rise to a concern about their welfare.

Each Foundation School has its own Missing Child Policy and procedures to be used for searching for and, if necessary, reporting any child missing from School. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.

All staff are informed of the Missing Child Policy and the procedures to be followed for their School and which are published in each School's Staff Handbook.

This Policy is available to parents and prospective parents, Governors, volunteers and staff in hard copy, upon request to the School Office at each of the four Schools. In addition, copies of the Policy may be inspected at any point in the School day in the School Offices and can be found on the Foundation website.

Each School's Missing Child Policy is compliant with KCSIE and the relevant statutory or other regulations, namely at Grimsdell the Statutory Framework and Practice Guidance for the EYFS and, at Mill Hill School and The Mount, Mill Hill International, the NMS.

23. Honour Based Violence ('HBV') and Female Genital Mutilation ('FGM')

So called HBV encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including forced marriage, FGM and practices such as breast ironing. All staff will be alert to possible indicators of HBV. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

Guidance on the warning indicators of forced marriage or FGM may be about to take place or may have already taken place are given in Multi-agency guidelines: Handling case of forced marriage pages 13 to 14 (<https://www.gov.uk/guidance/forced-marriage>) and in the Multi-agency statutory guidance on FGM pages 38 to 41 (<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>). To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or having already suffered HBV.

From October 2015, all teachers (along with social workers and healthcare professionals) have a statutory duty to report the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out in a girl under 18 years of age. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and children's social care. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out. If the teacher is unsure whether

this reporting duty applies, they should discuss their concerns with the DSL and involve the CSC as appropriate.

The duty does not apply in relation to at risk or suspected cases (i.e. where the Teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 years of age or older. In such cases a Teacher should activate local safeguarding procedures.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. 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 communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. Foundation staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.

24. Preventing Radicalisation

The Prevent Duty Guidance for England and Wales emphasis that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. The Foundation considers that radicalisation is similar to other forms of harm and abuse and therefore recognises its responsibility to protect its pupils from the risk of radicalisation as part of its safeguarding duties. The Foundation will have due regard to the need to prevent people from being drawn into terrorism and to the statutory guidance issued under Section 29 of the Counter- terrorism Security Act 2015.

Radicalisation is the process by which a person comes to support terrorism and forms of extremism.

Extremism is the 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, including calls for the death of members of the UK armed forces, whether in this country or overseas.

The Foundation recognises that the general risks affecting children and young people may vary from area to area and according to their age.

The indicators given in Prevent within Schools are attached at Appendix C. The Prevent Strategy has three main objectives;

- Response to the ideological challenge of terrorism and the threat we face from those who promote it;
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support;
- Work with sectors and institutions where there are risks of radicalisation which we need to address.

The Foundation aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The Foundation Schools will provide safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Foundation is committed to ensuring appropriate emphasis in its curriculum to promote fundamental British values as an essential aspect to counter radicalisation and enable staff and pupils to develop the knowledge and skills to challenge extremist arguments.

The Foundation's prevent duty safeguarding arrangements will take into account the policies and procedures of MASA, provide for effective engagement with parents and families who are in a key position to spot signs of radicalisation, and assist and advise parents and families who raise concerns with regard to the identification of the signs of radicalisation and suitable support mechanisms. The Foundation will discuss any concerns in relation to possible radicalisation with a child's parents in line with this policy unless there is specific reason to believe that to do so would put the child at risk.

25. Mental Health Support

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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day to day and identify those whose behavior suggests they may be experiencing a mental health problem or be at risk of developing one.

The Foundation has an important role to play in supporting the mental health and wellbeing of the pupils.

The Foundation recognises the need to have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral pathways to seek professional support.

If there is a concern over the mental health of a pupil immediate action should be taken by the staff member and their concern should be shared with the DSL.

26. Visiting Speakers

The Foundation recognises its duty to establish clear protocols for ensuring that any visiting speakers, whether invited by staff or by the pupils, are suitably and appropriately supervised. The Foundation's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the Foundation and British values.

The Foundation recognises that it is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the Foundation or perform any other regular duties for or on behalf of the Foundation.

A visiting speaker will only be invited with the permission of the Head of the School or, in the Head's absence, the Deputy Head, who will undertake a risk assessment before granting such permission by completing the Foundation's Visiting Speaker Consent Form (a copy of which is attached Appendix E). The Foundation School which has invited the speaker will obtain such formal or informal background information about the visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the School. In doing so the School will always have regard to the Foundation's Recruitment, Selection and Disclosure Policy, the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE. All visiting speakers will be subject to the Foundation's Security Policy which will include signing in and out at the School, the wearing of a visitors badge at all times and being escorted by a fully vetted member of staff between appointments.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the relevant School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

In fulfilling its Prevent Duty obligations the Foundation requires that the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

27. Policy on the Restraint of Pupils

The Foundation Policy on the Restraint of pupils operates in accordance with this Policy. All staff are informed of the Policy on the Restraint of Pupils and which is published in the Foundation Staff Handbook. This Policy is available to parents and prospective parents, Governors, volunteers and staff in hard copy, upon request to the School Office at each of the four Schools. In addition, copies of the Policy may be inspected at any point in the School day in the School Offices.

28. Early Years and Later Years (under-8s) childcare

Disqualification under the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009

The Foundation recognises that it is an offence to employ anyone in connection with its Early Years and Later Years (under-8s) provision who is disqualified, or for a disqualified person to be directly involved in the management of its Early Years and Later Years (under-8s) provision. The Foundation has due regard to the statutory guidance given in KCSIE. The Foundation will ensure that those who fall within the scope of the guidance in accordance with the Disqualification under the Childcare Act 2006 are required to complete a Self-declaration Form confirming whether they meet any of the criteria for disqualification under the Regulations, as set out in the Foundation's Recruitment, Selection and Disclosure Policy.

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Mrs Jenny Ticehurst, Deputy Head of Grimsdell (DSL).

Duty to notify Ofsted

The Grimsdell School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The Grimsdell School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

29. Mobile Phones and Cameras in the Early Years Foundation Stage Setting

Personal mobile phones in the early years setting are not allowed to be used and must be locked away at all times. Grimsdell School mobile phones have no camera or internet facility. All photographs of children are taken on school cameras or devices and are stored in accordance with the Data Protection Act and the Taking, Storing and Using Images of Children Policy. Further details with regard to this Policy can be found in the 'Mobile Phone and Early Years Toolkit' employed at Grimsdell School and with which the School complies.

30. Looked After Children

In order to provide the appropriate support and to keep looked after children safe the DSL of each school shall promote the educational achievement of children who are looked after at the Foundation Schools. Each DSL will have received appropriate training.

The appropriate staff will be provided with all necessary information with regard to a looked after child to ensure the safety of the pupil, including contact arrangements for those with parental responsibility, the pupil's care arrangements, the level of authority delegated to a carer by the Authority looking after the pupil and any other information that the DSL determines is required to keep the pupil safe.

31. Pupils with Special Educational Needs and Disabilities ('SEND')

The Foundation recognises that pupils with SEND may face additional safeguarding challenges, such as assumptions that signs of possible abuse such as behaviour, mood and injury relate to the pupil's disability without further exploration; that children with SEND can be disproportionately impacted by things like bullying – without outwardly showing any signs; and may have difficulties in communicating about abuse or neglect. All staff need to be alert to the specific needs of these pupils, including young carers. The Foundation Schools will support such pupils in expressing any concerns that they have and staff should be especially alert to any signs or indicators of abuse discussing this with the DSL's and/or the DDSL'S as appropriate.

32. Lesbian, Gay, Bi or Trans (LGBT+) Pupils

Children who are LGBT+ can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT+ (whether they are or not) can be just as vulnerable as children who identify as LGBT+. The Foundation is mindful of its obligations under the Equality Act in respect of supporting its LGBT+ pupils in expressing and handling any concerns that they have and staff should be especially alert to any signs or indicators of abuse discussing this with the DSL's and/or the DDSL'S as appropriate.

33. Online Safety

As the Foundation increasingly work online, it is essential that children in the Foundation are safeguarded from potentially harmful and inappropriate material. An effective approach to online safety is a whole school approach with mechanisms to identify, intervene and escalate any incident as necessary.

The Foundation is committed to doing all that it reasonably can to minimise a pupil's exposure to the risks posed by the internet and technology.

The Foundation will ensure that:

- Appropriate filters and monitoring systems are in place to keep pupils safe online. The aim of the Foundation's systems are to reduce the risk of pupils being exposed to illegal, inappropriate and harmful materials online; reduce the risk of pupils being subjected to harmful online interaction with others; and help manage online behaviour that can increase a pupil's likelihood of, or causes, harm (including when they are online at home).
- Its pupils are taught about online safety and safeguarding
- Staff are equipped with the knowledge to safeguard pupils online by receiving online safety training

The Foundation's Acceptable Use of Technology and Online Safety Policy and Guidance for Pupils on Acceptable Use of Technology and Online Safety set out the Foundation's approach to online safety.

34. Relationships and Sex Education

As part of Relationships and Sex Education, pupils are taught how to keep safe. This will cover all areas of relationships; how to recognise and report feelings of being unsafe and age appropriate education about safe sexual relationships and consent. Online safety is also taught as part of RSE including pupils' rights and responsibilities.

35. The Use of School Premises by Other Organisations

Where services or activities are provided separately by another body using the Foundation premises, the Foundation will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that all relevant safeguarding checks that the Foundation would otherwise perform have been made in respect of staff and volunteers.

36. Security

All members of staff of the Foundation have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Appropriate checks will be undertaken in respect of visitors and volunteers coming into the Foundation and visitors will be expected to sign in and out via the relevant office Visitors' Log and to display a visitor's badge whilst on the Foundation site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

All staff, contractors, volunteers and visitors must wear their Foundation lanyards at all times whilst on the Foundation site.

37. Code of Conduct

All staff are informed of the Staff Code of Conduct which can be found on the staff intranet, Firefly, and the policies section of Every. The main provisions which relate to Safeguarding can be found in Appendix A

38. Training

In accordance with the Governors' Statement and the Aims and Objectives of this Policy and KCSIE the Foundation will provide training for its staff and volunteers. This training will emphasise that safeguarding and the promotion of the welfare of children is everyone's responsibility and that all staff have a role to play in identifying concerns, sharing information and taking prompt action. The training will be as follows:

- The Heads, the DSLs and Designated Safeguarding Governor to receive updated child protection training in Advanced Child Safeguarding (Level 3 Training in Multi- Agency Working Incorporating Level 2 The Role of the DSL) at least every 2 years.
- The DSLs and DDSLs will undertake Prevent Awareness training in order to provide appropriate and sufficient Prevent Awareness training for staff to enable them to have the knowledge and confidence to identify a child at risk and to challenge extremist ideas which can be used to legitimise terrorism
- All staff to receive child protection training regularly in accordance with the guidance given by the local Safeguarding Children Board
- All staff, including part-time and temporary staff, staff on a contract for services and volunteers, will receive induction training as soon as he or she starts at the Foundation or earlier whenever possible. This induction training includes:
 - a summary of the provisions of this Policy
 - Their responsibilities in being alert to the signs of abuse and neglect, bullying or children at risk of radicalisation;
 - The role of the DSL;
 - The procedures for recording and referring any concerns to the DSL or the Head and, if required, to the CSC, or other specialist external agency or the Police as appropriate;
 - the staff Code of Conduct attached at Appendix A of this policy;
 - The Foundation's whistleblowing procedure;
 - The identity of their school's DSL and a copy of Part 1 of KCSIE and Annex A.
 - The Foundation's Policy on Acceptable Use of Digital Technology and Online Safety;
 - Promoting Positive Behaviour and Anti-Bullying Policies;

- The Foundation's Missing Child Policy and procedures.

As soon as practical all teaching and pastoral care staff will undertake Level 1 Safeguarding Training and Prevent training.

All staff will receive ongoing training through safeguarding and child protection updates which will be delivered either through staff meetings or the Foundation's Safeguarding, 'Keep It Safe' Bulletin which is issued at least once each term.

The mechanisms in place to assist staff to understand their role and responsibilities as set out in Part 1 of KCSIE and Annex A include in person training with an assessment questionnaire to ensure understanding, signed or online acknowledgment of receiving and reading KCSIE Part 1 and Annex A and the provision of briefing summaries of the provisions of KCSIE Part 1 and Annex A in the Foundation Safeguarding, Protection and Prevent Bulletin.

39. Record Keeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the DSL.

Each Foundation School's records on safeguarding and child protection issues, including the prevention of radicalisation concerning pupils will be kept on MyConcern and any existing paper files will be kept separately from other pupil records and securely held in the School's DSLs office. Any records or files relating to safeguarding and child protection issues, including prevention of radicalisation will be kept securely with the Head of the relevant school or the DFR.

Access to these records will be restricted to the DSL, CEO, Head of the School, DFR, DDSL, Designated Safeguarding Governor and Designated Governor for the Prevention of Radicalisation, and those authorised by the DSL or the Head of the School, as and when required.

The records on safeguarding and child protection will be reviewed regularly by the DSL and/or Head of the School to identify patterns of behaviour and will be retained in accordance with the provisions of the Foundation's Retention of Records Policy.

40. Monitoring

The Heads of each school in the Foundation will monitor the operation of this policy and the effectiveness of its procedures taking into account any improvements advised by the Designated Officer following a substantiated allegation against a member of staff or volunteer. Any deficiency that is noted in the Foundation's safeguarding and child protection arrangements will be remedied without delay.

41. Annual Review

The Court of Governors will undertake a thorough annual review of this Policy. The named Governor responsible for overseeing the implementation of this Policy will make an annual report on safeguarding and child protection to the Court of Governors at its December meeting. The Governors recognise the expertise that staff build up by undertaking safeguarding training and managing concerns on a daily basis.

As part of this Annual Review staff will be invited to contribute to and shape safeguarding arrangements and child protection policy through meetings and written submissions.

This Policy is next due to be reviewed in September 2021
By resolution of the Chair of the Court of Governors



Signed
Chair of the Court of Governors

Date 17 November 2020

APPENDIX A

SAFEGUARDING CODE OF CONDUCT

All staff are obliged to comply with the Staff Code of Conduct which can be found on the staff intranet, Firefly, and on the policies section of Every.

General Guidance:

The following are examples of the provisions contained in the Staff Code of Conduct which relate to Safeguarding.

Safeguarding Pupils

Staff have a duty to safeguard pupils from physical abuse, sexual abuse, emotional abuse and neglect.

The duty to safeguard pupils includes the duty to report concerns about a pupil or colleague to their school's DSL or DDSL's

Staff are provided with personal copies of the Policy to Safeguard and Promote the Welfare of Children who are Pupils at the Foundation and the Whistleblowing Procedure and staff must be familiar with these documents.

Staff should treat children with respect and dignity and must not demean or undermine or intimidate pupils, their parents or carers or colleagues.

Staff should not demonstrate behaviours that may be perceived as making jokes at the expense of pupils, embarrassing or humiliating pupils, discriminating against or favouring pupils.

Staff must take reasonable care of pupils under their supervision with the aim of ensuring their safety and welfare.

Dress and Appearance

All staff must dress in a manner that is appropriate to their role and promoting a professional image.

- Staff should dress in a manner that is not offensive or revealing.
- Staff should dress in a manner that is absent from political or other contentious slogans.

Relationships with Pupils

Relationships with pupils must be professional at all times, physical relationships with pupils are not permitted and will be reported to the relevant agencies (TRA, previously NCTL, DBS, police etc.) which may lead to a criminal conviction.

Encouraging a relationship to develop in a way which may lead to a sexual relationship or any other inappropriate relationship will be reported to the relevant agencies.

Contact with pupils must be via Foundation authorised mechanisms and solely for educational purposes.

At no time should personal telephone numbers, text, email addresses or communication routes via personal accounts on social media platforms be used to communicate with pupils.

If contacted by a pupil by an inappropriate route, staff should report the contact to the Head of their school immediately.

Behaviour giving rise to concern should also be reported which includes pupils seeking affection, being sexually inappropriate or exhibiting overly familiar behaviour.

Pupil Development

- Staff must comply with Foundation policies and procedures that support the well-being and development of pupils.
- Staff must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of pupils.
- Staff must follow reasonable instructions that support the development of pupils.

Code of Conduct Associated with Boarding

A member of staff on his or her own should not be with a pupil in the staff member's own accommodation.

When visiting a pupil who is on their own in their room, staff should leave the door open or, stand in the doorway with the door open. If they wish to have a private conversation with a pupil, the Housemaster/Housemistress/House Parent should be informed. It is better to have such conversations in a neutral space, such as a quiet common room area, but one which is routinely accessed, rather than secluded. In such circumstances, the Housemaster/Housemistress/House Parent will also be able to provide an appropriate area (e.g., his or her own study if it is situated on the pupils' side of the House).

When duty staff check rooms at night, ALL the rooms should be checked – even those assumed to be empty if the usual occupants have gone home. Duty staff will necessarily need to check sensitive areas such as bathrooms and toilets, but should always be aware of the sensitivities of such checks. They should announce their entrance in good time before going into these areas. Similarly staff should never, at any point, enter bedroom areas without knocking and should always allow sufficient time for a pupil response. Staff should never change or shower using the pupils' facilities nor use the same lavatory as pupils.

Code of Conduct Associated with EYFS

Specific measures for staff engaged with intimate care of pupils at Grimsdell is covered in the "intimate care" section of the Early Years Foundation Stage (EYFS) Policy.

E-Safety and Internet Use

- 1.1 Staff must exercise caution when using information technology and be aware of the risks to themselves and others. Regard should be given to the Foundation's Acceptable Use of Digital Technology and e-Safety Policy and to their Professional Responsibilities at all times both inside and outside of work.
- 1.2 Staff must not engage in inappropriate use of social network sites which may bring themselves, the Foundation, the Foundation community or employer into disrepute. Staff should ensure that they adopt suitably high security settings on any personal profiles they may have.
- 1.3 Staff should exercise caution in their use of all social media or any other web based presence that they may have, including written content, videos or photographs, and views expressed either directly or by 'liking' certain pages or posts established by others. This may also include the use of dating websites where staff could encounter pupils either with their own profile or acting covertly.
- 1.4 Contact with pupils should only made via the use of Foundation email accounts or telephone equipment when appropriate and strictly for educational reasons.
- 1.5 Staff are encouraged to use Foundation issued equipment for the purposes of taking photographs/stills or video footage of pupils. Personal devices may be used provided (a) the image taken is 'appropriate' and is in accordance with the Foundation's Storing and Use of Images Policy and (b) the image is removed from the device within 48 hours. Any such use should always be transparent and staff should be aware of those pupils for whom consent has not been given (details may be obtained from the Marketing and Communications Dept.). The Resultant files from such recording or taking of photographs must be stored in accordance with the Foundation's procedures on Foundation equipment.
- 1.6 When using any form of ICT, including the Internet in school and outside school, for your own protection we advise that you:
 - 1.6.1 Ensure all electronic communication with pupils, parents, carers, staff and others is compatible with your professional role and in line with the Foundation policies.
 - 1.6.2 Do not talk about your professional role in any capacity when using social media such as Facebook and You Tube.
 - 1.6.3 Do not put online any text, image, sound or video that could upset or offend any member of the whole Foundation community or be incompatible with your professional role.
 - 1.6.4 Use Foundation ICT systems and resources for all Foundation business save for exceptions as outlined in 11.5. This includes your Foundation email address, school mobile phone and school video camera.
 - 1.6.5 Do not disclose any passwords and ensure that personal data (such as data held on MIS software) is kept secure and used appropriately.
 - 1.6.6 Only take images of pupils and/or staff for professional purposes, in accordance with the Foundation policy and with the knowledge of SLT.
 - 1.6.7 Do not browse, download, upload or distribute any material that could be considered offensive, illegal or discriminatory.
 - 1.6.8 Ensure that your online activity, both in the Foundation and outside the Foundation, will not bring the Foundation or your professional role into disrepute.
 - 1.6.9 Emails should be checked in accordance with the provisions in the Foundation's Acceptable Use of Digital Technology and online Safety Policy.
- 1.7 You have a duty to report any e-Safety incident which may impact on you, your professionalism or the Foundation to the DSL or Head of your respective school.

Educational Visits

When taking part in educational visits, you should:

- follow the Foundation's policy on Educational Visits
- be accompanied by another adult unless otherwise agreed with the Head of your School
- undertake a risk assessment
- obtain parental consent
- never share bedrooms unless in a dormitory situation and arrangements have been discussed and agreed previously with the Head and, where appropriate, parents, guardians or carers and pupils

Transporting Pupils

There may be some situations when Staff are required to transport pupils. Staff should:

- ensure that they are fit to drive and free from any substances that may impair your judgement or ability to drive
- be aware that until the pupil is passed over to a parent/carer, they have responsibility for that pupil's health and safety
- record the details of the journey
- record and be able to justify impromptu or emergency lifts and notify the Deputy Head/Head
- ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety, including appropriate insurance, seat belts, adherence to maximum capacity guidelines etc.

Wherever practicable, staff should avoid using private vehicles and should try and have one additional adult to the driver to act as an escort.

Conduct Outside of Work

Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the Foundation or the employee's own reputation or the reputation of other members of the Foundation community.

In particular, criminal offences that involve violence or possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable.

Staff who are convicted or cautioned for any offence during their employment with the Foundation, including drink drive offences, are required to notify their respective Head immediately, in writing, of the offence and the penalty.

Staff may undertake work outside the Foundation, either paid or voluntary, provided that it does not conflict with the interests of the Foundation nor be to a level which may contravene the working time regulations or affect an individual's work performance in the Foundation. Staff may not engage in paid work to tutor Foundation pupils outside of school hours (either at School or elsewhere) without the express permission of the Head who will consider the circumstances on a case by case basis and may grant permission in exceptional circumstances.

Forming inappropriate relationships or friendships with children or young people who are pupils under the age of 18 at another school/college will be viewed as inappropriate and impact upon the Foundation's ability to trust the member of staff to maintain professional boundaries with pupils at the Foundation.

Raising Concerns

Staff should:

Share any concerns they have about their own behaviour, or the behaviour of other staff, especially in relation to interactions with pupils or a particular pupil with the appropriate person (DSL, line manager, or member of the SLT).

Share any concerns they have about the work and behaviour of pupils with the appropriate person (DSL, Housemaster/mistress, House Parent, line manager or member of the SLT).

- Where the concern relates to Child Protection and Safeguarding to immediately follow the Child Protection and Safeguarding Procedures.
- Where a concern about a colleague's work or behaviour has not been resolved informally, to follow the formal process set out in the Grievance Procedure.
- Where the concern relates to a parent to inform the appropriate person (DSL, House Parent, Line Manager or member of the SLT).

Potentially Difficult Circumstances (Miscellaneous)

- All staff must comply with the Bribery Act 2010. A person may be guilty of an offence of bribery under this act if they offer, promise or give financial advantage or other advantage to someone; or if they request, agree or accept, or receive a bribe from another person. If a member of staff believes that a person has failed to comply with the Bribery Act, you should refer to the Foundation's Whistleblowing procedure.
- All staff must comply with the provisions of the Foundation's Anti-Bribery Policy which can be found on the Foundation's website. This Policy governs the rules for staff with regard to gifts whether from suppliers, pupils or parents. Personal gifts from individual members of staff to pupils are inappropriate and could be misinterpreted and may lead to disciplinary action.

Confidentiality

Where staff have access to confidential information about pupils or their parents or carers, they must only access information that is relevant and must not reveal this information except to those colleagues who have a professional role in relation to the pupil. Further guidance for staff is outlined in the Confidentiality Policy.

All staff are likely at some point to witness actions which should remain confidential and appropriate procedures followed. For example, where a pupil bullied by another pupil (or by a member of staff), this needs to be reported and dealt with in accordance with the appropriate Foundation procedure. It must not be discussed outside the Foundation, including with the pupil's parent or carer, nor with colleagues in the Foundation except with a senior member of staff with the appropriate authority to deal with the matter.

Staff have an obligation to share, as soon as possible, with their school's DSL any information which gives rise to concern about the safety or welfare of a pupil. Staff must never promise a pupil that they will not act on information that they are told by the pupil.

APPENDIX B

DEFINITIONS AND SIGNS OF ABUSE

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. "Abuse can take place wholly online, or technology may be used to facilitate offline abuse." *KCSIE Sept 2020 paragraph 21.*

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and can often overlap with one another.

Categories of Abuse

1. 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.

2. 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.

3. 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 (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.

4. 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.

Possible Signs of Physical Abuse

- unexplained injuries or burns, particularly if they are recurrent
- improbable excuses given to explain injuries
- refusal to discuss injuries
- admission of punishment which appears excessive
- fear of parents being contacted
- bald patches
- withdrawal from physical contact
- arms and legs kept covered in hot weather
- fear of returning home
- fear of medical help
- self-destructive tendencies
- aggression towards others
- chronic running away

Possible Signs of Sexual Abuse

Young people may:

- be chronically depressed
- be suicidal
- use drugs or drink to excess
- self-mutilate, show self-hatred
- have unexplained pregnancies
- experience memory loss
- become anorexic or bulimic
- run away frequently
- be inappropriately seductive
- be fearful about certain people like relatives or friends

- assume the role of parents in the house to such an extent that they do all the cooking, cleaning, child-minding and taking care of everyone's needs except their own.
- not allowed to go out on dates or have friends round.
- have soreness/bleeding in the genital or anal areas or in the throat.
- find excuses not to go home or to a particular place.
- have recurring nightmares/be afraid of the dark.
- be unable to concentrate, seem to be in a world of their own.
- have a 'friend who has a problem' and then tell about the abuse of the friend
- have chronic ailments such as stomach pains and headaches
- sexually abuse a child, sibling or friend
- exhibit a sudden change in school/work habits, become truant
- be withdrawn, isolated or excessively worried
- have outbursts of anger or irritability
- be fearful of undressing for Physical Education/Games
- have unexplained sums of money
- act in a sexually inappropriate way towards adults.

Possible Signs of Emotional Abuse

- physical, mental and emotional development lags (ret. linear growth)
- admission of punishment which appears excessive
- over-reaction to mistakes
- sudden speech disorders
- fear of new situations
- inappropriate emotional responses to painful situations
- neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- self-mutilation
- fear of parents being contacted
- extremes of passivity or aggression
- drugs/solvent abuse
- chronic running away
- compulsive stealing
- scavenging for food or clothes.

Possible Signs of Neglect

- Change in behaviour
- Hunger
- Child appearing 'un kept'
- Loss of weight
- Tiredness
- Being left alone or unsupervised
- Inappropriate clothing
- Poor hygiene
- Eating more than usual/saving food

- Poor dental hygiene
- Not meeting a child's medical needs
- Parents not contactable or unavailable to discuss academic/pastoral needs.

DISCLOSURE AND OBSERVATION

Where a child volunteers information about possible abuse, or where staff see signs which cause them concern, they should:

- seek information from the child with tact and sympathy;
- listen to the child without interruption;
- not ask leading questions of the child;
- make a signed note of the conversation, with the date, time, place and whether any witnesses were present;
- make no undertakings to the child of absolute confidentiality;
- not investigate suspected abuse themselves and report the matter directly to the Head.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have serious/long lasting emotional psychological impact on children.

APPENDIX C

PREVENT WITHIN SCHOOLS INDICATORS OF VULNERABILITY OR INVOLVEMENT IN EXTREMISM

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences.

A list of indicators is given below to assist professionals to understand and identify factors that could suggest a child, young person or their family may be vulnerable or involved with extremism. The Channel Duty Guidance: Protecting Vulnerable People from being drawn into Terrorism (2015) also contains guidance on indicators. The DfE's briefing note: 'The use of social media for on-line radicalization (2015)' includes information on how social media is used to radicalize young people and guidance on protecting pupils at risk.

The list of indicators is not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people/ young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism.

Over-simplified assessments based upon demographics and poverty indicators have consistently demonstrated to increase victimisation, fail to identify vulnerabilities and, in some cases, increase the ability of extremists to exploit, operate and recruit.

INDICATORS

Vulnerability

- Identity Crisis - Distance from cultural/ religious heritage and uncomfortable with their place in the society around them
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self- esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

Access to Extremism/Extremist Influences

- Is there reason to believe that the child/ young person associates with those known to be involved in extremism – either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse,

friend or family member of someone believed to be linked with extremist activity)

- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc.)
- Is there reason to believe that the child/ young person has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g. Propaganda distribution, fundraising and attendance at meetings?
- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

Experiences, Behaviours and Influences

- Has the child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child or young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child or young person's behaviour or outward appearance that suggests a new social/ political or religious influence?
- Has the child or young person come into conflict with family over religious beliefs or lifestyle or dress choices?
- Does the child or young person vocally support terrorist attacks; either verbally or in their written work?
- Has the child or young person witnessed or been the perpetrator or victim of racial or religious hate crime or sectarianism?

Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/ young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child/ young person employed any methods to disguise their true identity? Has the child/ young person used documents or cover to support this?

Social Factors

- Does the child or young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child or young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child or young person demonstrate identity conflict and confusion normally associated with youth development?

- Does the child or young person have any learning difficulties/ mental health support needs?
- Does the child or young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child or young person have a history of crime, including episodes in prison?
- Is the child or young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child or young person have insecure, conflicted or absent family relationships?
- Has the child or young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child or young person's life has extremist view or sympathies?

More Critical Risk Factors Could Include

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour
- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- using insulting or derogatory names or labels for another group
- speaking about the imminence of harm from the other group and the importance of action now
- expressing attitudes that justify offending on behalf of the group, cause or ideology
- condoning or supporting violence or harm towards others
- plotting or conspiring with others

If you have any concerns discuss them with your Designated Safeguarding Lead and local Prevent Officer.

APPENDIX D

SAFEGUARDING CHILDREN IN EDUCATION GUIDANCE FOR STAFF DEALING WITH DISCLOSURES RECEIVE

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said
- Make a note of what has been said as soon as practicable

REASSURE

- Reassure the pupil, but only so far as is honest and reliable. For example, don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now'
- Do reassure and alleviate guilt, if the pupil refers to it. For example, you could say:
 - I believe you
 - I am glad you came to me
 - I am sorry this has happened
 - You're not to blame. You are not alone; you are not the only one this sort of thing has happened to.
 - We are going to do something together to get help

(Based on NSPCC guidelines)

Do not promise to keep it a secret as your professional responsibilities may require you to report the matter. If you make this promise to a child and then break it, you confirm to the child yet again that adults are not to be trusted.

REACT

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions, for example 'what did he do next?' (this assumes he did!), or 'did he touch your private parts?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court.
- Do not criticise the alleged perpetrator; the pupil may care about him or her, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff (the DSL). Try to see the matter through yourself and keep in contact with the pupil. Ensure that if a Children's Social Care interview is to follow, that the pupil has a support person present if the pupil wishes it (possibly yourself)

RECORD

- Make some very brief notes at the time on any paper which comes to hand, and write them up as soon as possible
- Do not destroy your original notes in case they are required by a court

- Record the date, time, place, persons present and noticeable non-verbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- Draw a diagram or complete a body map to indicate the position of any bruising
- Record statements and observable things, rather than your 'interpretations' or 'assumptions'

REMEMBER

- To follow the Foundation's child protection policy and procedures and share your concerns with your designated child protection officer. Referrals to the DSL or DDSL can be made using MyConcern, where the member of staff has access to a computer, in writing or in person Consult with your designated child protection members of staff as appropriate
- Support the child: listen, comfort, and be available
- Be careful to ensure that your own behaviour and actions do not place either pupils or yourself at risk of harm or allegations of harm to a pupil. Particular care should be taken to ensure that you do not place yourself in a situation which could lead to either you or a pupil feeling uncomfortable or which might be misconstrued by the pupil or by others. Staff should avoid things such as one- on- one tuition or sports coaching (other than in a public and highly visible area of the relevant School or a room the interior of which is clearly visible through windows and with the door open). Pupils should not be conveyed alone in cars or other vehicles with a member of staff other than in the case of a pressing medical emergency and then only with the prior knowledge of at least one other member of staff. You should also seek to avoid contacting pupils by text message or on social networking sites and you must never engage in electronic communication with a pupil which is, or could be reasonably interpreted as being, inappropriate

REMEMBER: Complete confidentiality is essential.

Share your knowledge only with appropriate professional colleagues.

- Try to get some support for yourself if you need it

Safeguarding Concern Form (To be used only if MyConcern is inaccessible)

| | | |
|---|--------|-------------|
| Name of pupil: | | Year group: |
| Date of birth: | | Form/House: |
| Summary of incident (to be completed at the end of the meeting): | | |
| | | |
| | | By who: |
| | | Date: |
| Referred to Children's Social Care | Yes/No | |
| Reported to DSL/DDSL | Yes/No | |
| Reported to Head | Yes/No | |
| Reported to Chair of Governors | Yes/No | |
| Signed: <i>(Designated Safeguarding Lead or Deputy Designated Safeguarding Lead)</i> | | Date: |

GUIDELINES FOR RECEIVING A DISCLOSURE

REMEMBER THAT THE DISCLOSURE IS CONFIDENTIAL AND INFORMATION IS ONLY TO BE SHARED WITH THE DESIGNATED PERSON

Child

Member of staff

Designated Safeguarding Lead or The Head or The Chair of Governors Children's Social Care/Police

In the Meeting:

1. **Once you become aware of the disclosure**, always take what a child says seriously
2. Find a quiet place to talk to the child. Re-assure and be supportive. Try to ensure that the pupil has access to water, toilets and tissues. However, this may not be possible. Stop the meeting immediately if a pupil is distressed. Offer them support and only resume the interview once the pupil feels able to do so. Consider seeking support from the Designated Safeguarding Lead, or one of his/her deputies
3. Explain why you cannot promise confidentiality and explain what you will do with the information shared with you. Let the child know that you will have to inform the Designated Safeguarding Lead
4. Listen but do not investigate
5. Do not ask leading questions
6. Make accurate notes (time, date, place, who was present, what happened and any observations of child's behaviour)

Next Steps:

1. Report any concerns you may have immediately to the Designated Safeguarding Lead, or Head as appropriate. (even if offsite). Referrals to the DSL or DDSL can be made using MyConcern, where the member of staff has access to a computer, in writing or in person
2. Complete the relevant sections of the front cover and attach your notes (signed and dated by you and the pupil)
3. Pass on these notes immediately to the Designated Safeguarding Lead, or Head, as appropriate

APPENDIX E

External Speaker Form

This form is for all staff who are planning an external speaker in school. It should be returned to the Senior Management lead at least 21 days in advance of event.

| Information Required | |
|---|--|
| Name of organiser: | |
| Department organising the event: | |
| Contact email: | |
| Contact telephone number: | |
| Event Details Title of event: | |
| Date of event: | |
| Venue/Location of event: | |
| Expected number of attendees | |
| Will the event be...? (Please type yes in box provided | |
| IT requirements? Laptop, projector? WIFI code? | |

Audience information

| Description of Audience | Please tick (Please tick for multiple groups) |
|------------------------------------|---|
| Staff facing | |
| Pupil facing | |
| Parent facing | |
| Member Only Invitation/ticket only | |
| Open to general public | |

About the Event: Please provide a short description of the event:

About the Speaker (s) This should include name, the organisation they're related to, the subject they will be speaking about and any other information you think we need to be aware of.

Any testimonials? If not have we sought advice from other schools the speaker has visited? Or can the member of staff act as a character reference? Please provide information:

Confirm any external speakers' affiliations (specifically where they are religious or political)

Declaration of any knowledge of controversy attracted by the speaker or topic in the past:

Confirmation of website details (where relevant) providing further information on the speaker

Is the event and speaker likely to attract media interest - if so why?

Staff Signature

Head's Signature

