



The Mill Hill School Foundation Policy to Safeguard and Promote the Welfare of Children who are Pupils at The Foundation



Name of Policy	Policy to Safeguard and Protect children who are Pupils at the Foundation
Date of Policy	October 2021
Name and post of person responsible	Jane Sanchez, Head of Mill Hill School
Frequency of Review	Annually
Dates of previous reviews	September 2020
Policy Reference	This policy can be found on the policy section of the Foundation website and on Every and on Firefly.
Total number of pages (including appendices and front sheet)	29
	Name (role):
Written:	Jane Sanchez (Head of Mill Hill School) and James Dickin (Deputy Head, Pastoral)
Externally ratified:	Simon Bayliss (Safeguarding Governor)
Ratified:	Pastoral Committee of the Court of Governors
Signed by:	Elliot Lipton (Chair of Governors)
Next Review:	September 2022

Policy to Safeguard and Protect children who are Pupils at the Foundation

Key External Contact Details.....	4
Key School Contact Details	5
List of Terms/Acronyms	7
1. This Policy.....	8
2. Principles and Practice	9
2. Responding to Concerns	11
4. What to do if a pupil wishes to make an allegation or disclosure.....	11
5. Early Help and Potentially Vulnerable Groups	12
6. Peer-on-Peer Abuse	13
7. Youth-produced Sexual Imagery (Sexting).....	15
8. Training.....	15
9. The Designated Safeguarding Lead (DSL).....	16
10. The Designated Safeguarding Governor.....	18
11. Mental Health Support	19
12. Child Criminal Exploitation (CCE)	19
13. County Lines.....	20
14. Child Sexual Exploitation (CSE).....	20
15. Domestic Abuse and Suspected Harm from Outside the Foundation	20
16. Child Missing from Education.....	21
17. Honour-Based Violence, Female Genital Mutilation and Forced Marriage	21
18. Preventing Radicalisation	22
19. Visiting Speakers	22
20. Early Years Foundation Stage (EYFS)	22
21. Allegations Against Staff.....	23
22. Record Keeping	25

APPENDICES

Appendix A – Signs of Abuse	27
1. Neglect.....	27
2. Physical Abuse.....	27
3. Sexual Abuse	27
4. Emotional Abuse.....	27
Possible Signs of Neglect	28



Possible Signs of Physical Abuse	28
Possible Signs of Emotional Abuse.....	29
Appendix B - Prevent: Indicators of Vulnerability or Involvement in Extremism	30
Vulnerability.....	30
Access to Extremism/Extremist Influences	30
Travel	31
Social Factors.....	31
More Critical Risk Factors Could Include	31
Appendix C - Safeguarding Concern Form (To be used only if MyConcern is inaccessible).....	33
Appendix D - External Speaker Form	34

Key External Contact Details

Designated Officer in the Local Authority	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 CSC 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: 01325 953795 Email: dbsdspatch@dbs.gsi.gov.uk
Teaching Regulation Agency	Address: 53-55 Butts Road, Earlsdon 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 008 0151 Email: fmufco.gov.uk
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
Barnet Safeguarding Children Partnership	bscp@barnet.gov.uk
Reporting FGM	Police: 101
Police Safer Schools Contact	Shannon Farthing 07776678163

Key School Contact Details

Governors		Email
Chair of Governors Safeguarding Governor	Mr Elliot Lipton Mr Simon Bayliss	clerktothegovernors@millhill.org.uk
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 (DFR) Director of Operations	Mr Antony Spencer Mrs Jane Sanchez Mr Leon Roberts Mrs Kate Simon Mrs Sarah Bellotti Mrs Nicky Marlow Mr Sean Ryan	CEO@millhill.org.uk head@millhill.org.uk head@belmontschool.com head@grimsdell.org.uk head@millhillinternational.org.uk nmarlow@millhill.org.uk sean.ryan@millhill.org.uk
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) Tel: 020 8959 1173	Mr James Dickin, Deputy Head (Pastoral)	jcd@millhill.org.uk
Belmont 020 8906 7290	Ms Kaarin Scanlan, Deputy Head (Pastoral)	kscanlan@belmontschool.com
Grimsdell 020 8959 6884	Ms Jenny Ticehurst, Deputy Head, EYFS Safeguarding Lead	jticehurst@grimsdell.org.uk
The Mount, Mill Hill International (MMHI) 020 3826 3333	Ms Sarah Proudlove, Deputy Head	slp@millhillinternational.org.uk
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	jab@millhill.org.uk jmb@millhill.org.uk sjeb@millhill.org.uk jyt@millhill.org.uk
Belmont	Mr James Fleet, Deputy Head (Operations and Co-Curriculum) Ms Libby Russo, Assistant Head of Wellbeing	jfleet@belmontschool.com
Grimsdell	Mrs Emily Jenner; (Assistant Head Early Years)	ejenner@grimsdell.org.uk
The Mount, Mill Hill International (MMHI)	Ms Emma Moustafa (Staff and Pupil Wellbeing Lead) Mr John Taylor, Foundation Head of Boarding	em@millhillinternational.org.uk

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	<i>Keeping Children Safe in Education (September 2021)</i>
BSCP	Barnet Safeguarding Children Partnership
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
LGBTQIA	Lesbian, Gay, Bisexual, Trans, Queer, Intersex, Asexual pupils

1. This Policy

The Mill Hill School Foundation (the 'Foundation') fully recognises its responsibilities for safeguarding, child protection and promoting the welfare of all of its pupils. Safeguarding refers to measures implemented to protect the health, wellbeing and human rights of children so that they may live free from harm, abuse and neglect.

This Policy covers Mill Hill School, Belmont Mill Hill Preparatory School, Grimsdell Mill Hill Pre-Preparatory School and The Mount, Mill Hill International. The 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 or volunteer) working in the four schools and to the Members of the Court of Governors of the Mill Hill School Foundation. The Foundation will employ past pupils or use past pupils as volunteers only if more than three years has elapsed since the pupil left the Foundation.

This Policy has regard to the statutory guidance issued by the Department for Education (the 'DfE') in *Keeping Children Safe in Education* (September 2021) ('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), the Independent School Standards Regulations (the 'ISSR') (2014), the National Minimum Standards for Boarding Schools (the 'NMS') (2012), the Statutory Framework and Practice Guidance for the Early Years Foundation Stage (the 'EYFS') (2021) and the requirements of the Code of Practice published by the Disclosure and Barring Service (the 'DBS').

This Policy may be viewed on the website of each of the four Foundation Schools. It is available in hard copy or larger print on request to 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.

The Foundation does not distinguish between its pupils on the grounds of age, in that it does not consider that its child protection responsibilities should end once a pupil attains the age of 18. Any reference to a 'child' or 'pupil' in this policy or other Foundation policies includes any pupil aged 18 years and over.

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

- Acceptable Use of Technology and Online Safety Policy
- Anti-Bullying Policy
- Early Years Policy
- Guidance for Pupils on Acceptable Use of Technology and Online Safety (currently under review)
- Missing Child Policy
- Promoting Positive Behaviour Policy
- Recruitment, Selection and Disclosure Policy and Procedure,
- Relationships and Sex Education Policy
- Restraint of Pupils
- Searches Guidance
- Staff Code of Conduct

- Taking, Storing and Using Images of Children Policy
- Whistleblowing Policy

2. Principles and Practice

Foundation responsibilities

The Foundation's responsibility to safeguard and promote the welfare of children is of paramount importance. It consequently has a duty to consider at all times the best interests of the child and to take action to enable all children to have the best outcomes. The Foundation is committed to protecting every pupil from any form of abuse, whether from an adult or another pupil. All children have equal rights to protection.

The Court of Governors recognises its responsibility for ensuring that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children; creating an environment where staff feel supported in their safeguarding role and are able to raise concerns; and ensuring that those who work directly with children have regular reviews of their own practice so that they have knowledge, skills and experience which improve over time.

In support of its aim to promote a culture which makes its schools safe places in which to learn and to live, the Foundation has robust health and safety procedures, and promotes safe working practices for those who work with children. It operates clear and supportive policies for pupils on alcohol and substance misuse. Where services or activities are provided separately by another body using the Foundation premises, the Foundation will make all necessary checks with regard to safeguarding and child protection.

The Foundation will ensure that, through the publication of the Policy and by other means, parents understand the responsibilities placed on the Schools and staff for child protection.

This Policy and associated Policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review. Any deficiency that is noted in the Foundation's safeguarding and child protection arrangements will be remedied without delay.

Helping Pupils to Keep Safe

The Foundation is committed to raising pupils' awareness of safeguarding and child protection issues. At every stage, pupils are taught through the wider curriculum and at an age-appropriate level how to stay safe, based on what may happen to them not only in school but also beyond it. This includes staying safe online, the dangers of cyberbullying and sexting, and the management of phone internet accessibility. Pupils will be helped to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet. Pupils are also helped to understand the risks posed by those whose use the internet and social media, to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. Appropriate filters and monitoring systems are in place to safeguard pupils from potentially harmful and inappropriate online material. Pupils will be expected to conform to the requirements of the Foundation's Acceptable Use of Technology and Online Safety Policy and Guidance for Pupils on Acceptable Use of Technology and Online Safety.

Procedures

The Foundation has clear procedures for identifying and reporting suspected cases of abuse, and for supporting any pupil who has been abused. There are also procedures to minimise the risk of peer-on-peer abuse, as well as clear guidance as to how allegations of peer-on-peer abuse will be dealt with. Types and signs of abuse are listed in Appendix A.

The Foundation will follow the inter-agency procedures and local protocols of the BSCP and MASA. It will work collaboratively with these agencies and other professionals to take immediate action where a pupil has suffered or is likely to suffer significant harm and to provide additional support for children in need and those with emotional and mental health issues.

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 that 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 or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

The Foundation Schools will co-operate readily with the Channel panel and the Police in providing relevant information in determining whether an individual is vulnerable to being drawn into terrorism or radicalisation.

The Foundation recognises the importance of acting on and referring the early signs of abuse and neglect, radicalisation, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

Staff

All staff members will maintain an attitude of '**It could happen here**' in relation to safeguarding. They are expected to be alert to any signs of abuse or need and to recognise the importance of providing early help. When concerned about the welfare of a child, staff members must always act in the best interests of the child.

The Foundation recognises the importance of creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role. Staff should thus feel able to follow the Foundation's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices, potential failures by the Foundation or its staff properly to safeguard the welfare of pupils, or other wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children. 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.

Safer recruitment is practised in order to check the suitability of all staff and Governors and others who work with children. See the Foundation's Recruitment Selection and Disclosure Policy. Where staff from another organisation are working with our pupils on another site, we will have received assurances that appropriate child protection checks and procedures apply to those staff.

All staff must comply with the requirements and expectations of the Staff Code of Conduct. Staff should be aware of the importance of making appropriate safeguarding arrangements for one-to-one teaching, for instance extra tuition, instrumental music lessons and sports coaching.

Where staff have access to confidential information about a pupil or the pupil's family, they must access only information that is relevant and must not reveal this information except to those colleagues who have a professional entitlement through their role in relation to the pupil. Further guidance for staff may be found in the Confidentiality Policy.

3. Responding to Concerns

If a member of staff has any concerns about a child, but there is no risk of immediate harm, the DSL must nonetheless be informed and s/he will decide what action to take. All staff should be prepared to identify children who may benefit from Early Help. If Early Help is appropriate, the DSL will liaise with other agencies as appropriate.

In considering a referral, the DSL will differentiate between safeguarding children who are in need of additional support from one or more agencies and those who have suffered or are at risk of suffering serious harm. The former should lead to Early Help, inter-agency assessment and intervention using local processes, including the use of the Early Help Assessment, now in use and 'Team Around the Child' (TAC) approaches. In the latter case, a referral will be made to Children's Social Care immediately, and in any case within 24 hours. If a crime may have been committed, the Police will be informed from the outset. Anyone may make a referral if necessary: should this be the case, the DSL must be informed as soon as possible.

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. Concerns should always lead to help for the child.

When deciding whether to make a referral, following an allegation or disclosure, 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 without giving names in the first instance.

Based on the perceived level of risk, referral processes, such as Channel or CSC, will be used where there are concerns that a child may be drawn into radicalisation or terrorism.

While decisions to support a child about whom there are concerns would normally be taken in consultation with parents and pupils, their consent is not required for referrals to statutory agencies such as the Police and Children's Social Care: what is in the best interests of the child will always be of overriding importance.

In relation to Channel referrals, the DSL will consider seeking the consent of the child and/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.

4. What to do if a pupil wishes to make an allegation or disclosure

Any adult responding to a pupil who wishes to make an allegation or disclosure must:

- listen carefully to the pupil and keep an open mind. They should not display shock or disbelief or form a decision as to whether or not abuse has taken place;
- reassure the pupil but not give a guarantee of absolute confidentiality, explaining that they have to pass the information to the DSL or another senior person, who will ensure the correct action is taken;
- not take any action that may jeopardise a Police investigation, such as asking a child leading questions or attempting to investigate the allegation or disclosure;
- not ask the pupil to repeat it all to another member of staff;
- record only statements and observations, not the adult's 'interpretations' or 'assumptions';
- keep a sufficient written record of the conversation. It should include date, time and place, and the essence of what was said and done by whom in whose presence. The record should use names, not initials, and be signed and dated by the person making it. All evidence, for example scribbled notes, mobile phones containing messages, clothing and computers, should be preserved and safely stored;
- 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.

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 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 the record must be handed to the Head of the School. If it involves the Head, the record should be passed directly to the CEO of the Mill Hill School Foundation who will immediately inform the chair of the Court of Governors. If it involves the CEO it must be reported to the Chair of the Court of Governors.

There is a report form at Appendix C which may be used if MyConcern is inaccessible.

5. Early Help and Potentially Vulnerable Groups

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 agencies, 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.

Examples of potentially vulnerable groups include boarders, pupils with SEND, and pupils who have protected characteristics.

- Staff should be alert to pupil relationships and the potential for peer abuse among boarders.
- 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 their concerns about abuse or neglect. All staff need to be alert to the specific needs of these pupils, including young carers.
- Children who are LGBTQIA+ can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+. Again, staff should be alert to any signs or indicators of abuse and should discuss concerns with the DSLs and/or the DDSLs as appropriate.

In order to provide the appropriate support and to keep looked after children safe, the DSL of each school will 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.

6. Peer-on-Peer Abuse

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

- abuse within intimate partner relationships;
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- 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; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- 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;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which is a criminal offence and 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 alarm;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- and initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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'. Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. While the gendered nature of peer-on-peer abuse is recognised (i.e. that it is more likely that girls will be victims and boys perpetrators), all peer-on-peer abuse is unacceptable and will be taken seriously. Additionally, the foundation recognises that not all peer-on-peer abuse is reported and even if there are no reported cases it may still be occurring and we should remain vigilant.


The Foundation recognises that children with special educational needs and disabilities can be more prone to peer-on-peer group isolation and more vulnerable to peer-on-peer abuse than other children and will consider extra pastoral support for those children. The Foundation also recognises that children in residential settings can be particularly vulnerable and is alert to the potential for peer-on-peer abuse here.

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.

A bullying incident should be treated as a child protection concern when there is reasonable cause to believe that a child is suffering or is likely to suffer significant harm. Any such abuse will be referred to the appropriate local agency.

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. In the case of pupils whose parents live abroad, the pupil's guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during an investigation. 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. Confidentiality will be an important consideration for the Foundation and advice will be sought as necessary from MASA and/or the Police as appropriate.

In the event of disclosures about peer-on-peer 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 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. 

7. Youth-Produced Sexual Imagery (Sexting)

Making, possessing and distributing sexual photographs and videos of under 18s is illegal. When an incident involving sexting comes to the Foundation's attention, the matter should be referred to the DSL as soon as possible. The DSL should then hold an initial review meeting with appropriate staff. There should be subsequent interviews with the pupils involved, if appropriate. Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm. If at any point in the process there is concern that a child has been or is at risk of being significantly harmed, a referral should be made to the CSC and/or the Police immediately. Viewing youth-produced sexual imagery can be distressing for both young people and adults and appropriate emotional support may be required.

Adults should not view youth-produced sexual imagery unless there is good and clear reason to do so. Details on searching, deleting and confiscating devices can be found in the DfE Searching, Screening and Confiscation advice. If a device needs to be seized and passed on to the Police, then it should be confiscated and the Police should be called; in the meantime the device should be turned off and placed under lock and key until the Police are able to retrieve it.

8. Training

With the proviso that, in accordance with *KCSIE*, the Foundation's Court of Governors will take a proportional risk-based approach with regard to the level of information that is provided in training to temporary staff and volunteers, all staff will be provided with induction training that includes:

- this Policy;
- the Staff Code of Conduct;
- the Pupil Promoting Positive Behaviour Policy and Anti-Bullying Policy;
- the Whistleblowing Policy;
- the identity, contact details and role of the DSLs and DDSLs;
- the safeguarding response to children who go missing in education, and Missing Child Policy;
- the Policy on Acceptable Use of Digital Technology and Online Safety;
- a copy of Part 1 and Annex B of *KCSIE* (September 2021)
- the use of MyConcern for making referrals of safeguarding concerns relating to pupils and on how to manage a report on child-on-child sexual violence or sexual harassment.

All staff will be required to confirm that they have read this Policy and Part 1 and Annex B of *KCSIE* (September 2021).

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

All staff will undertake regular child protection training in line with guidance from the Local Safeguarding Children Board. All staff will receive updates as required, and at least annually, through staff meetings or the Foundation's safeguarding 'Keep it Safe' bulletin, which is issued at least once a term.

The Heads, DSLs, DDSLs and Designated Safeguarding Governor will undergo Advanced Child Safeguarding Training (formerly Level 3) which will be updated at least every two years. The DSLs will also

complete safer recruitment training every five years, and the DSLs and DDSLs undertake Prevent awareness training. The DSLs will refresh their knowledge and skills at regular intervals, as required, and at least annually, to enable them to understand and keep up with relevant developments.

The named Safeguarding Governor and Chair of Governors are trained in Safer Recruitment and Advanced Safeguarding (formerly Level 3). All other Governors complete online safeguarding Level 1 training every two years and have an annual safeguarding update by a DSL. In addition, those Governors involved in recruitment within the Foundation complete Safer Recruitment training at least every five years.

Senior pupils who are given positions of responsibility are briefed on the appropriate actions to take should they receive allegations of abuse. The Deputy Head (Pastoral) at Mill Hill is responsible for organising these briefings and ensuring that they occur regularly.

9. The Designated Safeguarding Lead (DSL)

The Court of Governors has appointed a member of staff of each Foundation school's senior leadership team to be that school's DSL. The DSL will take lead responsibility for child protection, welfare and the prevention of radicalisation. The DSL will be given the time, funding, training, resources and support they need to carry out the role effectively.

The DSL or Deputy Designated Safeguarding Lead (DDSL) will always be available in school hours to discuss safeguarding concerns about welfare and safeguarding matters. For out of hours/out of term activities, the relevant DSL/DDSL should be contacted or MASH should be called on 0208 359 4066 or 0208 359 2000.

If the DSL is unavailable, his/her duties will be carried out by one of the Deputy Designated Safeguarding Leads (DDSLs). In this Policy, reference to the DSL includes the DDSL where the DSL is unavailable. All the DSLs and DDSLs form part of the Foundation Safeguarding Team.

The names and contact details of the DSLs and DDSLs are given on pages 4 and 5.

The DSL is 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. Pupils may ask to speak specifically to either a male or a female DSL/DDSL and such a request will be accommodated whenever reasonably practicable.

The DSL will ensure that there are always appropriate arrangements for listening to children and providing early help.

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 about whom there are concerns regarding harm, abuse, emotional well-being or other aspects of his or her welfare. The DSL will take prompt action where there are concerns that a pupil may be in need of help, and if a pupil is suffering or at risk of significant harm, the DSL will make an immediate referral to CSC or other agencies, including the Police.

While aspects of the job description detailed below may be delegated to a DDSL, the DSL nonetheless retains overall responsibility for all of them.

- As stipulated in Annex B of *KCSIE*, the DSL is required to:
- refer cases of suspected abuse to the CSC as required and support staff who make referrals to the CSC;
- refer cases to the Channel programme where there is a radicalisation concern, as required, and support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the DBS, as required, and refer cases where a crime may have been committed to the Police, as required;
- act as a point of contact to the Foundation's safeguarding partners;
- liaise with the Head to inform him/her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations;
- as required, liaise with the 'case manager' and the Designated Officer in cases which concern a staff member;
- liaise with relevant staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; act as a source of support, advice and expertise for all staff;
- understand the assessment process for providing early help and statutory intervention, including local criteria for action and CSC referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to those effectively when required to do so;
- ensure each member of staff has access to, and understands, the Foundation's Child Protection Policy and procedures, especially new and part-time staff; is alert to the specific requirements of children in need, those with special educational needs, and young carers;
- 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;
- be able to keep detailed, accurate and secure written records of concerns and referrals;
- support the Foundation with regard to the requirements of the Prevent duty and is able to provide advice and support to staff on protecting children from the risk of radicalisation;
- be 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.
- be able to 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;
- obtain access to resources and attends any relevant or refresher training courses;
- encourage a culture of listening to pupils and taking account of their wishes and feelings, regarding any measures the Foundation may put in place to protect them;
- ensure that the Foundation's Child Protection Policies are known, understood and used appropriately;
- ensure that the Foundation's Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Court of Governors regarding this;

- ensure that the Child Protection Policy is available publicly and that parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the Foundation in this;
- link with the safeguarding partner to make sure that staff are aware of any training opportunities and the latest policies on local safeguarding arrangements;
- help promote positive educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including those with a social worker, are experiencing or have experienced with teachers and Foundation leadership staff;
- where children with a child protection file leave the Foundation, ensure that their file is transferred to their new school or college as soon as possible; this should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. 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 child leaving the Foundation.
- In addition, the DSLs 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 Foundation's systems to protect pupils are reviewed and improved; reviewing and logging reports of online safety incidents; reporting to the SLT/Head of their school and co-ordinating training for pupils, staff, governors and parents to improve understanding of all aspects of online safety.
- The DSLs will ensure that the Foundation has due regard to the need to prevent people from being drawn into terrorism; has assessed the risk of children being drawn into terrorism; has drawn up clear procedures for protecting children at risk of radicalisation; and has established clear protocols for ensuring any visiting speakers are suitable and appropriately supervised.
- The DSLs will 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.
- The DSLs will work with the Designated Governor for Safeguarding to review and update this Safeguarding Policy.
- The DSLs will regularly review their School's and their own practices and procedures 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.
- The DSLs will work with the Foundation Head of PSHE and RSE to deliver a curriculum that helps educate children about safeguarding and how to protect themselves both on and offline. This education will flow through the Foundation.

10. The Designated Safeguarding Governor

Mr Simon Bayliss is the named Governor delegated by the Court of Governors to take leadership responsibility for safeguarding arrangements including the implementation of this Policy. He is responsible for ensuring that the Foundation contributes to inter-agency working in line with *Working Together* through effective communication and good co-operation with local agencies. He is also responsible for the oversight of the safeguarding and prevention of radicalisation procedures and their implementation.

In addition, he is responsible for presenting an annual Report jointly with the DSLs 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 be prepared following consultation with the Heads and DSLs from each of the four Foundation Schools. It

will form part of the Court of Governors' annual review of the Foundation's child protection Policies, which is undertaken to ensure that all members of the Court of Governors, as part of their legal responsibilities, are satisfied that this Policy and associated Policies are fully appropriate and compliant, and that the related duties have been discharged fully and efficiently.

11. 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 behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

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

12. 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, through violence or the threat of violence, into criminal activity in exchange for something the victim needs or wants, or for the financial gain or other advantage of the perpetrator or facilitator. 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 County Lines below) forced to shoplift or pickpocket or to threaten other young people.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation,

13. 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. Children are often recruited to move drugs and money between locations.

One of the ways of identifying potential involvement in county lines are episodes when the child goes missing (both from home and school) and 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/third sector providers who offer support to victims of county lines exploitation.

14. 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: unexplained gifts or new possessions; association with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections or becoming pregnant; changes in emotional well-being; misuse of drugs and alcohol; go missing for periods of time or regularly come home late; and regularly missing school or education. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

15. Domestic Abuse and Suspected Harm from Outside the Foundation

A member of staff who suspects that a pupil is suffering harm from outside the Foundation, including abuse at home, 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.

16. 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 the risk of radicalisation, FGM or forced marriage. 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 for one of a number of stipulated reasons. 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 the Foundation's Missing Child Policy if any absence of a pupil from the Foundation gives rise to a concern about their welfare.

17. Honour-Based Violence (HBV), Female Genital Mutilation (FGM) and Forced Marriage

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.

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 FGM, or having already suffered FGM. Victims of FGM are likely to come from a community that is known to practise FGM. Some indicators that a girl has already been subjected to FGM are as follows: difficulty walking, sitting or standing and even looking uncomfortable; frequent urinary, menstrual or stomach problems or spending longer than normal in the bathroom due to difficulties urinating; prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return; and reluctance to undergo medical examination.

All teachers and healthcare professionals have a statutory duty to report to 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. 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.

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. 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.

18. Preventing Radicalisation

The Prevent Duty Guidance for England and Wales emphasises 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 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 Counterterrorism 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 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.

Indicators of vulnerability or involvement in extremism may be found in Appendix B.

19. Visiting Speakers

In accordance with the Prevent statutory guidance, the Foundation has a protocol to ensure that visiting speakers are suitable and appropriately supervised. A visiting speaker will be invited only 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. 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.

20. Early Years Foundation Stage (EYFS)

Personal mobile phones are not allowed to be used in the early years setting and must be locked away at all times. All photographs of children are taken on school cameras or devices and are stored in accordance with the Data Protection Act and the Acceptable Use of Digital Technology and Online Safety Policy. Further details related to this Policy can be found in the 'Mobile Phone and Early Years Toolkit' employed at Grimsdell School.

If a staff member is taking medication which may affect their ability to care for children, the staff member should seek medical advice. Staff medication is always safely stowed away out of the reach of children. Staff are aware that they must declare to either Kate Simon or Emily Jenner if they are taking any medication, which might affect their ability to work with children.

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 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 that they do not meet any of the criteria for disqualification under the Regulations, as set out in the Foundation's Recruitment, Selection and Disclosure Policy.

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. 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.

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).

The Designated Safeguarding Lead (DSL) for safeguarding in the Early Years is the Deputy Head of Grimsdell, Jen Ticehurst jticehurst@grimsdell.org.uk. The Deputy Designated Safeguarding Lead (DDSL) is Emily Jenner, Assistant Head Early Years ejenner@grimsdell.org.uk. The DSL is responsible for liaison with the local statutory children's services agencies, and with the Local Safeguarding Partners (LSP).

21. Allegations Against Staff

Where an allegation is made against a member of staff, 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.

Where an allegation is made against the DSL, the member of staff receiving the allegation must immediately inform the Head of the relevant School, who will take over the DSL's duties. If the Head is absent, the allegation should be passed directly to the CEO of the Mill Hill School Foundation.

Where an allegation is made against the Head, the member of staff receiving the allegation must immediately inform the CEO who will immediately inform the Chair of the Court of Governors (or in his absence the nominated Safeguarding Governor) who will immediately consult with the Designated Officer without notifying the Head first.

Where an allegation is made against the CEO, the member of staff receiving the allegation must immediately inform the Chair of Governors (or in his absence the nominated Safeguarding Governor).

In all of the cases mentioned above, the welfare of our pupils will remain the absolutely priority in line with the guidance from KCSIE.

As stipulated in *KCSIE*, the Head or, where the Head is the subject of the allegation, the Chair of the Court of Governors should discuss the allegation immediately with the Designated Officer in order to consider the nature, content and context of the allegation and agree a course of action. 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.

The Designated Officer should be informed within 24 hours of all allegations that come to the School's attention and appear to meet one or more of the following criteria: that the person is alleged to have behaved in a way that has or may have harmed a pupil; or 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 that they may not be suitable to work with children.

Where appropriate, the DSL will be informed as soon as possible. An allegation may be referred directly to the Police. The Foundation must not undertake its own investigation of allegations without prior consultation with the Designated Officer, or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the Designated Officer can be held informally, and without naming the school or individual.

While the Foundation is 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 and are thus not able to collect the facts or liaise with the Designated Officer.

A referral to MASA or the 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.

All discussions will be recorded in writing. Any communication with both the individual and the parents of the child or children must be agreed. GDPR cannot be allowed to stand in the way of safeguarding children.

The Foundation's procedures for dealing with allegations against staff (including supply teachers or volunteers who work with children) 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, when considering its actions the Foundation must consider whether pupils are at risk or may be at risk, and whether the member of staff's presence in the school would impede an investigation.

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 of 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.

Suspension will not be an automatic response to an allegation. 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 *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. Where a member of the 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.

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. 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 consequently 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 consequently 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 the TRA in accordance with *KCSIE* guidance.

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.

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 be provided only 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.

All low-level concerns should be reported by employees of the Foundation in the same way as other safeguarding concerns are managed, The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in *KCSIE*. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language

For further information please refer to the Staff Code of Conduct and the Whistleblowing Policy.

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.

22. 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 My Concern 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.

Records concerning allegations of abuse will be preserved for the term of the independent Inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for ten years from the date of the allegation if it is longer.

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.

23. Review

This Policy is next due to be reviewed in September 2022. By resolution of the Chair of the Court of Governors, Elliot Lipton

Signed:



Elliot Lipton
Chair of the Court of Governors

Date: 13 October 2021

APPENDIX A

TYPES 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. 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 stand-alone events that can be covered by one definition or label and they can often overlap with one another.

Types 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.

Possible Signs of Neglect

- Change in behaviour
- Hunger
- Child appearing 'unkempt'
- 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 or guardians not contactable or unavailable to discuss academic/pastoral needs

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 familiar with others
- 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 or gifts
- act in a sexually inappropriate way towards adults

Possible Signs of Emotional Abuse

- physical, mental and emotional development lags
- 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

APPENDIX B

PREVENT: INDICATORS OF VULNERABILITY OR INVOLVEMENT IN EXTREMISM

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 to 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 Online Radicalisation (2015)' includes information on how social media is used to radicalise 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.

INDICATORS

Vulnerability

- Identity Crisis: distance from cultural/religious heritage; uncomfortable with their place in the society around them;
- Personal Crisis: family tensions; sense of isolation; adolescence; low self-esteem; dissociating 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: experience of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Access to Extremism/Extremist Influences

- Reason to believe that the child 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 is a friend or family member of someone believed to be linked with extremist activity)
- Evidence to suggest that the child is accessing the internet for the purpose of extremist activity (e.g. use of closed network groups, access to or distribution of extremist material, contacting associates covertly via Skype/email etc.)
- Reason to believe that the child has been or might to be involved with extremist/military training camps/locations
- Possession or actively seeking to possess and/or distribute extremist literature or other media material likely to incite racial religious hatred or acts of violence
- Sympathy with or support for illegal/illicit groups: e.g. propaganda distribution, fundraising, attending meetings

- Support for groups which are not illegal/illicit but have links to extremist activity

Experiences, Behaviours and Influences

- Peer, social, family or faith group rejection
- Evidence of extremist ideological, political or religious influence on the child from within or outside UK
- International events in areas of conflict and civil unrest having a personal impact on the child resulting in a noticeable change in behaviour; many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) and it is important to differentiate them from those that sympathise with or support extremist activity
- A significant shift in the child's behaviour or outward appearance that suggests a new social/political or religious influence
- Conflict with family over religious beliefs or lifestyle or dress choices
- Vocal support of terrorist attacks; either verbally or in their written work
- Witness to or 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

- Experience of poverty, disadvantage, discrimination or social exclusion
- A displayed lack of affinity or understanding for others, or social isolation from peer groups
- Displayed identity conflict and confusion not normally associated with youth development
- Mental health problem or special educational needs or difficulties
- A simplistic or flawed understanding of religion or politics
- A history of crime, including episodes in prison
- A foreign national, refugee or individual awaiting a decision on their immigration/national status
- Insecure, conflicted or absent family relationships
- Experience of any trauma in their lives, particularly trauma associated with war or sectarian conflict
- Evidence that a significant adult or other person in the child'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 other



APPENDIX C

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 whom:	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:	

APPENDIX D

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

Instilling values, inspiring minds
millhill.org.uk

Mill Hill School Foundation

Walker House
Millers Close
The Ridgeway
Mill Hill
London NW7 1AQ

+44 (0)20 8959 8131
millhill.org.uk

Follow us

@MillHillSenior @MillHillBelmont @MillHillPrePrep @MillHillIntl @CobhamHall

