

**The Mill Hill School Foundation  
Walker House, Millers Close, The Ridgeway, Mill Hill,  
London NW7 1AQ**

**Mill Hill School  
Belmont, Mill Hill Preparatory School  
Grimsdell, Mill Hill Pre-Preparatory School  
The Mount, Mill Hill International**

## **The Policy to Safeguard and Promote the Welfare of Children who are pupils at the School**

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**Independent Co-educational Day School for Pupils aged 3 to 18  
years and Boarding School for Pupils aged 13 to 18 years**

**Effective March 2017**

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The Policy to Safeguard and Promote the Welfare of Children  
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## **The Mill Hill School Foundation**

### **The Policy to Safeguard and Promote the Welfare of Children who are pupils at the School**

#### **Statement**

The Mill Hill School Foundation [the 'Foundation'] fully recognises its responsibilities for child protection. 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. 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 School [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 Lead [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 PSHEE, including on line. Taking into account this Report, the Court of Governors will then conduct its annual review 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 and understanding necessary to keep safe children who are looked after by the local authority, 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. 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-centred 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 (2015).

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 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 2016) (the 'KCSIE') and operates in accordance with the London Borough of Barnet and other locally agreed inter-agency procedures. It is compliant with The Prevent Duty Guidance for England and Wales 2015, 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 (2015), Disqualification under the Childcare Act (February 2015), Mental Health and Behaviour in Schools (March 2015), Counselling in Schools; a blueprint for the future (March 2015) and the Statutory Framework and Practice Guidance for the Early Years Foundation Stage (the 'EYFS').

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.

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 Use of Email, the Internet and Social Media Policy for Staff
- The Use of Email, the Internet and Social Media Policy for Pupils
- The Policy on the Restraint of Pupils
- The School's Anti-bullying Policy
- The School's Missing Child Policy

The Foundation defines a member of staff as: Any person working 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, gap students, 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 School considering the appointment 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.

Each of the Foundation Schools has appointed a DSL with the necessary status and authority who will take responsibility for matters relating to child protection and welfare. The responsibilities of the DSL at each Foundation School are detailed in the role-holder's job description. The DSL will have received appropriate training in child protection and inter-agency working and attend refresher training at 2-yearly intervals.

### **Definitions 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 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, 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/>) 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
- Bullying including cyberbullying
- 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
- Sexting
- Relationship abuse
- Trafficking.

### **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:

- Ensuring that the Foundation practises 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:
  - 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 accordance with the NMS guidance a successful applicant will not be permitted, under any circumstances, to commence employment which involves boarding duties at the Foundation until the Foundation is in receipt of the successful applicant’s DBS disclosure certificate which the Foundation considers satisfactory;
  - 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 s. 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 Chairman 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 student) 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.
  - 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, truancy and sexting put children in danger.
- Being alert to signs of abuse both in the School 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 School fully discharges its responsibilities to provide additional support for children in need, such as supporting a pupil with emotional or mental health issues, as well as children at risk.
- Establishing a safe environment in which children can learn and develop and ensure that School 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 PSHEE curriculum.
- 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.
- 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 5<sup>th</sup> edition (2016) (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:

1. Ensure Safer Recruitment Procedures are always followed according to the DfE guidance, KCSIE and DBS guidelines.
2. 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.
3. 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.
4. Ensure there is a nominated Governor to take leadership responsibility for safeguarding and child protection arrangements and the prevention of radicalisation.
5. Ensure all members of staff and volunteers, including Governors, know the name of the DSLs and their role.
6. 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.
7. 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.
8. 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.
9. Notify CSC if there is an unexplained absence of a pupil who is on the Child Protection Register
10. 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.

11. Where relevant, 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.
12. Ensure that the safeguarding arrangements being followed reflect local protocols for assessment and the LCSB's threshold document and to provide information as requested by the LCSB.
13. Ensure that pupils are taught about safeguarding, including online, through teaching and learning opportunities.

### **The Designated Safeguarding Lead**

The DSL at each Foundation school will take lead responsibility for child protection and the prevention of radicalisation. The DSL will direct and provide advice and support to staff members in carrying out their safeguarding duties and the prevention of radicalisation and who 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 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.

The DSL at each school in the Foundation is:

Mill Hill School,	Mrs Jane Sanchez, Principal Deputy Head
Belmont,	Mr Paul Symes, Senior Deputy Head (Pastoral)
Grimsdell,	Mr Kevin Dobson, Deputy Head (also for EYFS)
The Mount, Mill Hill International	Mr John Gale, Deputy Head (Pastoral)

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 Kurt Seecharan, Assistant Head (Pastoral)
Belmont,	Mrs Ruh Alford, Deputy Head (Academic)
Grimsdell,	Ms Sarah Broom (also for EYFS)
The Mount, Mill Hill International	Mrs Jane Sanchez, Principal Deputy Head (MHS)

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.
- Be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies 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.
- 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 are made aware of these arrangements.
- 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, and in a locked location.
- Ensure all staff and volunteers read KCSIE Part 1 guidance 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, where a pupil on the child protection register leaves, the information is transferred to the new school immediately and that the pupil's social worker is informed.
- Liaise with the child protection officer appointed by the CSC (Local Authority Designated Officer (the 'LADO')), 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 Barnet Local Safeguarding Children Board [the 'LCSB'] 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 School 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 School.
- 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.

Dr A Craig 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, 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 is trained in Safer Recruitment and Advanced Child Safeguarding (Level 3 Training in Multi-Agency Working incorporating Level 2 The Role of the DSL).

### **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, including 'by association' i.e. he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

### **Whistleblowing:**

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 a Whistleblowing section in this Policy.

All staff and volunteers are required to report to the DSL any concern or allegations about School 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 to the Head of the School and the record must be handed to the Head or, if the Head is absent, the allegation should be passed directly to the Chairman of the Court of Governors of the Mill Hill School Foundation. If an allegation is made against the Head of the School, the member of staff receiving the allegation must immediately inform the Chairman 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 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.

## **Procedures**

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

- Must 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.
- Must not ask a leading question, i.e. a question that suggests its own answer.
- Must 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 Chairman of the Court of Governors, as appropriate in accordance with this Policy, who will ensure the correct action is taken.
- Must 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, if the Head is absent, the allegation should be passed directly to the Chairman of the Court of Governors of the Mill Hill School Foundation.
- Preserve and safeguard all evidence, for example scribbled notes, mobile phones containing text messages, clothing and computers.
- The named Governor and Chairman of the Court of Governors may be contacted through Walker House on 0208 959 8131 or the Clerk to the Court on 07767386225.

### **Action taken by the DSL**

The action to be taken will take into account:

- The procedures attached at Appendix A
- 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 School.
- 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 LADO should be informed of all child protection allegations or suspicions against a member of staff or volunteer at the School that come to the School'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 School will be referred to the LCSB. 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 LADO or the LCSB. 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 school 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 LADO or LCSB on a no names basis without identifying the family. If the LADO 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' Sections 10.2 and 10.3).
- 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.

### **Referral Guidelines**

The DSL and Deputy DSL 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 LSCB 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.  
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 re-consideration.

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.

The safety of children is paramount in all decisions 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 LADO 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 LADO, 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 the LCSB 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 the LSCB 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.

### **Early Help**

The Foundation recognises that there may be pupils who, whilst not suffering harm or at immediate risk of harm, require additional support from one or more external agencies. 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, such as the Common Assessment Framework, being carried out. Such cases should be kept under constant review and consideration given to refer the case to the CSC if the child's situation does not appear to be improving.

### **External Agencies**

Whether or not the School 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 LADO – 0208 359 2000;
- Local Safeguarding Children’s Board (London Borough of Barnet) – 0208 359 4540;
- Local Safeguarding Children’s Board- Barnet Multi Agency Safeguarding Hub - 020 8359 4066;
- 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](mailto:counter-extremism@education.gsi.gov.uk).

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

- Anti Terrorist hotline: 0800 789 321;
- Crime stoppers: 0800 555 111;
- Local Police: 101;
- [www.gov.uk/report-suspicious-activity-to-mi5](http://www.gov.uk/report-suspicious-activity-to-mi5);
- [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism).

### **Boarding Pupils**

As there are boarding pupils at Mill Hill School the Governors recognise that appropriate provision should be made in the School 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 School 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 Principal Deputy Head 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.

## **Allegations against Staff**

The Foundation has procedures for dealing with allegations against staff (and 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 School must consider the following when assessing its actions:

- Is the pupil is at risk?
- Are other pupils are at risk?
- Will the member of staff's presence in the School 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 school 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 school any person (whether employed, contracted, a volunteer or student) 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 01325953795).

If any person (whether employed, contracted, a volunteer or student) 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 volunteer or student) 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 The National College for Teaching and Leadership in accordance with KCSIE guidance.

If an allegation is made against a member of staff 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 Chairman of the Court of Governors of the Mill Hill School Foundation.

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 Chairman of the Court of Governors of the Mill Hill School Foundation.

If an allegation is made against the Head, the member of staff receiving the allegation must immediately inform the Chairman of the Court of Governors of the Mill Hill School Foundation who will immediately consult with the LADO 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 LADO or may be referred directly to the Police whose advice will be followed.

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. These guidelines apply up to the point where the accused person is either charged with a crime or the DfE or National College for Teaching and Leadership publish such information.

### **Allegations against Pupils**

The Foundation recognises that children are capable of abusing their peers and the different gender issues that can be prevalent in peer on peer abuse, for example sexting, girls being sexually touched or boys being subjected to initiation or hazing type violence. The Foundation does not consider abuse should ever be tolerated or passed off as 'banter' or 'part of growing up'. All allegations of peer on peer abuse will be investigated and managed in accordance with this policy.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policy on behaviour and discipline will apply. The DSL will take advice from the CSC on the investigation of such allegations and will take all appropriate steps to ensure the safety and welfare of all pupils involved, including the alleged victim and perpetrator. An allegation against a pupil when there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm will be referred to the CSC.

All incidents involving sexual imagery will be managed in line with this policy.

A bullying incident will be treated in accordance with the Foundation School's Anti-bullying Policy and Expectation and Standards or Behavioural Policy unless it is considered to be a child protection concern where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.

If it is necessary for a pupil to be interviewed by the Police in relation to an allegation of abuse the DSL will ensure that, subject to the advice of the CSC, the parents of those involved are informed as soon as possible and the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration and advice will be sought as necessary from the CSC or Police as appropriate.

Both victim(s) and perpetrator(s) of peer on peer abuse will be offered support by the School's counsellors and pastoral, care teams, as appropriate.

### **Suspected harm from outside the school**

A member of staff who suspects that a pupil is suffering harm from outside the School 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.

### **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 to help prevent the risks of them going missing in the future. Unauthorised absence will be managed in accordance with that Foundation School's Missing Child Policy.

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

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

- 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 school 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 School's admission register where the pupil:
  - has been taken out of School by the parents and are 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 School;
  - has been certified by the 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 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 School's admissions register are met, but no later than deleting the pupil's name from the admissions register.

### **Child sexual exploitation**

Child sexual exploitation 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.

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

### **Honour based violence ('HBV') and Female genital mutilation ('FGM')**

So called HBV can include forced marriage and FGM. 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>). 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. Unless the teacher has good reason not to, they should also still consider and discuss any such case with the DSL and involve the CSC as appropriate.. Police

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.  
Police

## **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 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 Annex 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 the LSCB, 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.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

The Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

- There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.
- Example indicators that an individual is engaged with an extremist group, cause or ideology include:
  - spending increasing time in the company of other suspected extremists;
  - changing their style of dress or personal appearance to accord with the group;
  - day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
  - loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
  - possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
  - attempts to recruit others to the group/cause/ideology;
  - communications with others that suggest identification with a group/cause/ideology.

- Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:
  - 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.

The DfE's briefing note 'The use of social media for on-line radicalisation (2015)' includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

### **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 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 Senior Deputy. 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.

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.

## **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 School 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.

## **Missing Child Policy and procedures**

The Foundation has a Missing Child Policy which operates in accordance with this policy and each Foundation School has its own separate 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.

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.

## **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, including disqualification by association with others. 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 or anyone in their household meet any of the criteria for disqualification under the Regulations, as set out in the Foundation's Recruitment, Selection and Disclosure Policy.

The Foundation will remind annually those who fall within the scope of the guidance in accordance with the Disqualification under the Childcare Act 2006 of their duty to disclose all relevant information with regard to the statutory guidance.

- **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. 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. 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.

### **Looked after children**

In order to provide the appropriate support and to keep looked after children safe the Foundation has identified a member of staff of suitable status at the Foundation (the Designated Teacher') to promote the educational achievement of children who are looked after at the Foundation Schools. The Designated Teacher 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.

### **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 School's will support such pupils in expressing any concerns that they have and staff should be especially alert to any signs or indicators of abuse.

### **Online Safety**

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.
- 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 Use of Email, the Internet and Social Media Policy for Pupils sets out the Foundation's approach to online safety.

### **Code of Conduct**

All staff are informed of the appropriate procedures to be followed in the implementation of this policy through the Code of Conduct (attached at Appendix C) and published in the School Staff Handbook.

### **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 DSP) at least every 2 years.
- The DSL and DDSL 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 in accordance with the guidance given by the local Safeguarding Children Board. The frequency of such training to be provided by an external trainer appointed by the Foundation.
- 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 School or earlier whenever possible. This induction training includes 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 C 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. As soon as practical all teaching and pastoral care staff will undertake Level 1 Safeguarding 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, Protection and Prevent 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 include in person training with an

assessment questionnaire to ensure understanding, signed acknowledgment of receiving and reading KCSIE Part 1 and the provision of briefing summaries of the provisions of KCSIE Part 1 in the Foundation Safeguarding, Protection and Prevent Bulletin.

### **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, will be kept separately from other pupil records and securely held in the School's DSLs office. Access to these records will be restricted to the DSL, Head of the School, 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.

### **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 LADO 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.

### **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.

Last review by the Court of Governors

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By resolution of the Chairman of the Court of Governors

Signed .....  
Chairman of the Court of Governors

Date .....

## **APPENDIX A. 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. 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 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.

## **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, 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 gym
- 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.

### **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.

## **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 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/ 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/ young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the child/ young person vocally support terrorist attacks; either verbally or in their written work?

Has the child/ young person witnessed or been the perpetrator/ 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/ young person have experience of poverty, disadvantage, discrimination or social exclusion?
  - Does the child/ young person experience a lack of meaningful employment appropriate to their skills?
  - Does the child/ young person display a lack of affinity or understanding for others, or social isolation from peer groups?
  - Does the child/ young person demonstrate identity conflict and confusion normally associated with youth development?
  - Does the child/ young person have any learning difficulties/ mental health support needs?
  - Does the child/ young person demonstrate a simplistic or flawed understanding of religion or politics?
  - Does the child/ young person have a history of crime, including episodes in prison?
  - Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
  - Does the child/ young person have insecure, conflicted or absent family relationships?
  - Has the child/ 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/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

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



## APPENDIX D. SAFEGUARDING CODE OF CONDUCT

### General guidance:

The following are examples. They are not an exhaustive list.

#### Appearance, use of language etc.

- Members of staff should always dress appropriately and professionally for their role when on duty. They should not dress provocatively, or in a way that artificially reduces the boundaries that should exist between staff and pupils.
- Staff members should ensure that their language remains appropriate in front of pupils and that it reinforces the boundaries existing between staff and pupils.
- Members of staff should never, under any circumstances, make a sexual comment about another child or young person (whether a pupil at the School or not), make suggestive comments, or comment on their own sexuality in front of pupils.

#### Physical Contact

- Any physical contact should be used judiciously and sensitively; cultural, social, gender and religious issues should be taken into account. Contact should be open and transparent.
- If any member of staff feels in retrospect that there may have been some misunderstanding of such a situation, then they should report it to the DSL, or in the absence of the DSL, to the Head and an Incident Form should be completed.
- It is advisable to avoid one-to-one physical contact when a pupil is in distress or if a pupil is any state of undress. If this has not been possible, then this should be recorded formally afterwards and reported to the Designated Person, or in the absence of the DSL, to the Head.

#### Avoidance of one-to-one situations

- A member of staff should not be with a pupil on their own in a room unless there is a window to the corridor, or alternatively, a window which looks out onto a public space.
- Staff members should avoid being in a car with a pupil on his or her own unless a senior member of staff has full knowledge of the journey and the reasons for it (e.g. a visit to hospital), usually the Deputy Head (Pastoral) or at Mill Hill School the Principal Deputy Head. There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers. Wherever possible, some sort of written authorisation (e.g., e-mail to a Housemaster/Housemistress) must be secured before such use of a private car takes place.
- Any out of workplace activities should be ideally run by two adults; where this not possible, a member of the Senior Management Team should be given full details.
- A member of staff on his or her own should not be with a pupil in the staff member's own accommodation other than in exceptional circumstances. There must always be a strong pastoral justification. Such meetings with a boarding

pupil at Mill Hill and The Mount, Mill Hill International will require the permission in advance of the pupil's Housemaster/Housemistress. Such meetings with a day pupil will require the permission in advance of the Principal Deputy Head for a pupil at Mill Hill, the Deputy Head (Pastoral) at Belmont for a pupil at Belmont, the Deputy Head at Grimsdell for a pupil at Grimsdell and the Deputy Head at The Mount, Mill Hill International for a pupil at The Mount, Mill Hill International. Such meetings should never take place after 11pm other than in exceptional circumstances.

#### Use of technology, communication with pupils etc.

- Staff must comply with the Mill Hill School Foundation Policy on the Use of Email, the Internet and Social Media and should only use electronic equipment or telephones provided by the School for any communication with pupils and should avoid using their own telephones or other equipment for direct communication with pupils except in an emergency.
- All electronic and telephone communication should be transparent and open to scrutiny, with limited personal detail given and comply with Mill Hill School Foundation Policy on the Use of Email, the Internet and Social Media or School Policy and protocol.
- Staff should not engage in inappropriate electronic communication with pupils, e.g. having pupils as 'friends' on social networking sites.

#### Potentially difficult circumstances (miscellaneous)

- Staff should never ask pupils to carry out chores or personal errands for them.
- The giving of gifts and rewards should be carried out in accordance with School Policy; private or personal gifts should not be given to pupils unless there is an exceptional reason and this has been cleared with a senior staff member (normally, at Mill Hill School the pupil's Housemaster/Housemistress, at Belmont the Head of Upper or Head of Lower School, and at Grimsdell the Deputy Head).
- In response to the 2011 Bribery Act, members of Common Room are advised to inform the Headmaster immediately should they be offered gifts (including hospitality) from pupils and/or parents with a value in excess of £100.
- Where possible, selection processes for House or School events should be carried out by more than one member of staff.
- Any social contact between staff and pupils/parents outside School, (e.g., visits to a pupil's home) must be carefully managed and openly acknowledged. Staff are entitled to a social life like anyone else. However, the extra-curricular life of a member of Staff at the Foundation can potentially have professional consequences if not properly managed. Whenever there is doubt about the appropriateness or advisability of particular social contact, advice should be sought from a member of the School's Senior Management Team.
- If a member of staff is aware that a pupil has developed an infatuation or other inappropriate emotional attachment with him or her, then they should formally report this to a senior member of staff (usually, a member of the School's Senior Management Team).

## **In Boarding Houses and on duty:**

### Members of staff – own accommodation

A member of staff on his or her own should not be with a pupil in the staff member's own accommodation other than in exceptional circumstances. There must always be a strong pastoral justification. Such meetings with a boarding pupil at Mill Hill and The Mount, Mill Hill International will require the permission in advance of the pupil's Housemaster/Housemistress. Such meetings should never take place after 11pm other than in exceptional circumstances.

### Pupils' rooms (both bedrooms and bathrooms)

- 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 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 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.

### Difficult situations

- Members of staff should not get caught up in lengthy or emotional conversations in bedrooms, especially at night. If someone is distressed, the Housemaster/Housemistress should be told immediately; if that is not possible, the situation should be defused by taking the pupil onto neutral ground and then allow him or her to explain the problem.
- The Director of Boarding / Deputy Head (Pastoral) / Bursar/ Headmaster all reside in school accommodation on site. They or the Principal Deputy Head are contactable in cases of emergency.

### Miscellaneous

- Ensure that any DVDs shown in House are age appropriate.
- Do not drink alcohol with pupils other than under the circumstances laid down in the School's Alcohol protocol.

### **Confidential information:**

- Occasionally staff may have confidential information given to them about a pupil by their Housemaster/Housemistress, but this should not be raised or discussed with the pupil unless this has been discussed first with the Housemaster/Housemistress.

### **Whistleblowing:**

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 a Whistleblowing section in this Policy.

All staff and volunteers are required to report to the DSL any concern or allegations about School 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 to the Head of the School and the record must be handed to the Head or, if the Head is absent, the allegation should be passed directly to the Chairman of the Court of Governors of the Mill Hill School Foundation. If an allegation is made against the Head of the School, the member of staff receiving the allegation must immediately inform the Chairman 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 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.

**CONFIDENTIAL**



**Mill Hill School Foundation**

**Disclosure Form**

School: .....

Name of Pupil: ..... Form: .....

Time: ..... Date: .....

Venue: .....

Observations:

Please use reverse side if necessary

Name (Print): .....

Signed: .....

**PLEASE PASS ON TO  
THE DESIGNATED SAFEGUARDING LEAD AND LOCAL PREVENT OFFICER**