



# MILLFIELD

## **Safeguarding and Child Protection Policy 2022/2023**

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## Safeguarding Policy and Child Protection Procedures

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THIS POLICY APPLIES TO MILLFIELD, MILLFIELD PREP SCHOOL AND MILLFIELD PRE-PREP SCHOOL (INCLUDING EYFS), MILLFIELD ENTERPRISES AND MILLFIELD SCHOOL ENTERPRISES LIMITED (TOGETHER REFERRED TO AS "MILLFIELD ENTERPRISES"), (TOGETHER REFERRED TO IN THIS POLICY AS "MILLFIELD", "SCHOOL" OR "SCHOOLS").

### Introduction

Millfield is fully committed to safeguarding and promoting the welfare of the children and young people in our care. Millfield facilitate a whole school approach to safeguarding, we understand that **safeguarding is everyone's responsibility**, and we expect everyone working at our school to share this commitment. Safeguarding and child protection are at the forefront, and underpin all relevant aspects of process and policy development. Safeguarding is described in statutory guidance [Working Together to Safeguarding Children](#) and [Keeping Children Safe in Education](#), and is defined as:

- protecting children from maltreatment;
- preventing impairment of children's mental or physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- and
- taking action to enable all children to have the best outcomes.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them, as such Millfield will:

- treat the interests of our children as paramount (taking into consideration their disability, culture and history) and;
- consider at all times, the best interests of the child.

The Board of Governors and Board of Directors of Millfield Schools Enterprises Limited approves this policy and it is annually reviewed by them. The policy encompasses the schools' boarding provision and off-site activities. Millfield Schools address their commitment to the above principles through:

**Prevention** - ensuring all reasonable measures are taken to minimise the risk of harm to children's welfare. These include:

- Ensuring safer recruitment practice\*
- Facilitating a whole school approach towards safeguarding by ensuring policies and procedures (some of which are listed below) are clear, transparent, and easy to understand for students, staff, parents and carers.
- Ensuring through training that all teaching and support staff are aware of and committed to the Safeguarding Policy and Child Protection Procedures ("the Policy and Procedures") Code of Conduct, Whistleblowing Policy, Student Behaviour Policy Pre-Prep/Prep School, and Student Behaviour Policy Senior School.
- Establishing a positive, supportive and secure culture in which children can learn and develop, together with a School ethos which promotes in all students a sense of being valued, listened to and respected in order to reduce the risk of harm to children e.g. with respect to child-on-child abuse.

- Taking a proactive, preventative and educative approach to safeguarding issues with its staff and students. Opportunities are sought to give teaching and learning opportunities to our students, within the context of the curriculum, activities, and opportunities for PSHEE. The possible avenues for such education to take place include:
  - School/Year group assemblies
  - House assemblies
  - Pastoral discussions between students and the wider pastoral team, including Medical Centre staff, Chaplains, Counselling Team, and Matrons etc
  - Online safety presentations and curriculum content
  - Student voice such as leadership roles in school, committees raising issues with staff
  - House, Year Group and school Councils
  - Year Group PSHEE/RSE presentations from external speakers
  - Year group meetings with School Counsellors or circle time.

Such opportunities are delivered in an age-appropriate way and priority is given to ensuring an emotionally safe environment, ground rules of confidentiality are set and any vulnerable students are identified and managed in accordance with this Policy. Learning opportunities aim to develop confidence within our students so they feel able to communicate about safeguarding issues, including asking questions and disclosing concerns.

- Providing pastoral support that is accessible and available to all students and ensuring that students know to whom they can talk about their concerns and that these will be taken seriously.

(\*refer to separate policies and guidance for full details; this guidance will follow the Independent Schools Standards Regulations and comply with guidance with regard to the DBS (Disclosure & Barring Service). All employees undergo full pre-employment checks including an enhanced DBS check and, where applicable, the disqualification by association (Child Care Act 2006)).

**Protection** – ensuring all appropriate actions are taken to address concerns about the welfare of a child or children, working to agreed local policies and procedures in full partnership with other local agencies especially the Police and Children’s Social Care (Safeguarding Children Joint Chief Inspectors’ Report Department of Health October 2002). These include:

- Sharing information about concerns with agencies who need to know and involving children and their parents/carers appropriately (including Children’s Social Care, the Police, the Local Authority Designated Officer (“LADO”) and in “Prevent” with the Channel process)
- Any member of staff can refer to the LADO or Children’s Social Care; however it is the expectation that the Designated Safeguarding Leads (“DSLs”) are the primary communicators with LADO and Children’s Social Care as appropriate. They will contact the LADO and local safeguarding partner arrangements within 24 hours of a disclosure or suspicion of abuse, although if there is risk of immediate harm this contact must be immediately
- The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in a school. Somerset’s LADO can be contacted via Children’s Social Care (Somerset Direct) on 0300 123 2224. There are online procedures which are regularly updated. (The website is accessible to all staff via Millfield Schools Extranet - <https://www.proceduresonline.com/swcpp/somerset/index.html>)
- Monitoring children known or thought to be at risk of harm and to contribute to assessments of need and support packages for those children.

Safeguarding, in addition to child protection, encompasses issues such as student health and safety, bullying/cyber-bullying, appropriate medical provision, drugs and substance misuse. These have specific policies and guidance, which should be read in conjunction with this document.

## **Managing Safeguarding and Child Protection**

### **Roles and Responsibilities**

#### **Staff**

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk.

All staff, including volunteers and supply staff, have a statutory obligation to promptly report any concerns to the DSL if there is suspicion of abuse of a student, if a student discloses abuse or allegations of abuse or if there is any indication that a child is being abused by somebody. Any verbal reports of concern made to the DSL should be followed up in writing. In addition, any members of staff may refer a concern to the LADO or Children's Social Care (Somerset Direct) themselves if they feel it necessary or appropriate.

**Staff have a duty to be responsible in promoting the welfare of students at all times and to take action to safeguard their welfare.**

Key points:

- Be vigilant
- Listen to children
- Observe changes in attitude or behaviours
- Respond to specific concerns at any early stage – self-harming, depression, eating disorders etc.
- Report any concerns to the appropriate designated professional
- Do not conduct any own investigations but contact relevant agencies who will have the authority to do so
- Be prepared to whistle blow if you have any concerns about the conduct of volunteers or colleagues in respect of their handling of children
- Be open to the potential of child-on-child abuse
- Understand the potential for “grooming”

It should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. As a school we need to be aware that children can be at risk of abuse or exploitation in situations outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships, (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation. As a school we will be alert to these extra-familial harms through ongoing training and liaising with Somerset Safeguarding Partnership (SSP).

Somerset's LADO can be contacted via Children's Social Care (Somerset Direct) on 0300 123 2224. NSPCC Whistleblowing Helpline 0800 028 0285.

[When to call the police \(NPCC\)](#) – Guidance for schools and colleges.

**This is an inescapable, personal and professional responsibility of all staff and volunteers for the protection of children from harm.**

**All staff need to have read and understood and be able to discharge their responsibilities as set out in Part One of Keeping Children Safe in Education ("KCSIE") September 2022 and with due reference to The Prevent 2015 and Working Together to Safeguard Children 2018 Guidance.**

Staff could have their suspicion or concern raised in a number of ways, the most likely of which are:

- the conduct of a member of staff
- a child, parent or member of staff 'disclosing' abuse
- evidence of physical hurt or deterioration in mental health that may or may not be accompanied by unusual or uncharacteristic behaviour by a child.

The following individuals have specific roles and responsibilities under Child Protection Procedures that are outlined below:

### **Full Governing Body ("FGB")**

**It is an essential feature of good governance that responsibility is not delegated to others without first ensuring reliable mechanisms for monitoring and evaluation of policy implementation.** The Governing Body will ensure that Governors comply with their duties under legislation and that the schools' policies, procedures and training are effective and comply with the law at all times. Governors' responsibilities include:

- Ensuring a whole school approach towards safeguarding by ensuring the involvement of everyone in the school, and ensuring that safeguarding, and child protection are at the forefront of process and policy development.
- Ensuring that an effective child protection policy is in place, together with a staff behaviour code of conduct policy and behaviour policy.
- Ensuring that staff receive, read and understand Part 1 and/or Annexe B (for those who work directly with children) of KCSIE(September 2022) and are aware of specific safeguarding issues.
- Ensuring that staff induction is in place with regards to child protection and safeguarding and that all staff receive regular, ongoing training.
- Ensuring that under the Equalities Act 2010 (which encompasses the Public Sector Equality Duty (PSED)) the school will not unlawfully discriminate against any student or staff member because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation, whilst carefully considering how these individuals are supported.
- Ensuring that a member of each school's senior leadership team is designated to take lead responsibility for safeguarding issues (the Designated Safeguarding Leads), approving their job description and ensuring that they receive regular and appropriate training.
- Prioritising the welfare of children and young people and creating a culture where staff and volunteers are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that children are taught about safeguarding in an age appropriate way.

- Ensuring appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material.
- Having a senior board level lead to take leadership responsibility for the organisation's safeguarding arrangements.
- Scrutinise the single central record and ensure effective child protection recording is undertaken.
- Ensuring safeguarding is regularly discussed and outcomes recorded at Governor meetings.
- Ensuring that the provision is carrying out inter-agency working and provides a coordinated offer of early help when additional needs of children are identified.
- Ensuring that the requirements of the Annual Safeguarding Audit are met and actions when needed completed in a timely way.

The Audit, Compliance & Risk Committee reports to the Full Governing Body ("FGB") and has delegated responsibility for scrutiny of the Annual Audits and the Policy and Procedures prior to their submission to the FGB.

### **Nominated Governor**

**Mr Oliver Welsby** is the **Nominated Governor** for Safeguarding and Child Protection at Millfield Schools (including EYFS). His responsibilities include:

- On behalf of the FGB, carrying out detailed monitoring of the implementation of the Policy and Procedures (including an annual review of sample entries in the Single Central Register);
- Maintaining close and regular contacts with the DSLs
- Working with the DSLs and DDSLs to review the Annual Audits and judge the efficiency with which procedures have been implemented and to report on this to the FGB;

He can be contacted through the Clerk to the Governors, Mrs Rachel Summerhayes – email [summerhayes.r@millfieldschool.com](mailto:summerhayes.r@millfieldschool.com) or telephone 01458 444596

### **Chair of Governors**

It is the role of the Chair of Governors, Mr Roland Rudd, to deal with allegations of abuse made against the Heads. In the absence of the relevant Head any allegation of abuse against a member of staff will be reported to the Chair of Governors.

For details on how to contact the Chair of Governors, please contact the Clerk of Governors, Mrs Rachel Summerhayes ([summerhayes.r@millfieldschool.com](mailto:summerhayes.r@millfieldschool.com) or 01458 444596).

### **Headteachers**

**Mr Dan Thornburn** is the Headmaster of Millfield Prep School and **Mr Gavin Horgan** is the Headmaster/CEO of Millfield Senior School. Their responsibilities include:

- ensuring that the Policy and Procedures approved by the FGB are fully implemented;
- ensuring that the role of DSL is filled by an individual with appropriate qualifications and experience and given significant prominence in the school community;
- ensuring that DfES guidance is followed to ensure safe staff recruitment and that adequate staff checks and records are maintained.

## The Designated Safeguarding Leads

In the Prep School, the Head of Pre-Prep, **Mr Michael Jory**, is the **Designated Safeguarding Lead (DSL)**. **Mr Ben Hilton**, Deputy Head, Pastoral and **Mr David Guthrie**, Head of Year 7 are the **Deputy Designated Safeguarding Leads (DDSL)**.

The **Designated Safeguarding Lead** in the Early Years Foundation Stage (Reception and Nursery & Pre-Prep) is **Mr Michael Jory** and the **Deputy Designated Safeguarding Leads (DDSL)** are **Ms Amy Denbee (DDSL)** (EYFS stage only) and **Mr Ben Hilton**, (Prep School DDSL and Pre-Prep (excluding EYFS) DDSL).

In the Senior School the Assistant Head (Student Welfare and DSL) **Mr Adi Whatling**, is the **Designated Safeguarding Lead (DSL)**. The **Deputy Designated Safeguarding Lead's (DDSL)** are Mrs Fiona Ellison (**DDSL**), Mr Craig Middleton (**DDSL**), Mrs Kait Weston (**DDSL**), Mrs Claire Trainor (**DDSL**) and Mr Toby Sawrey-Cookson (**DDSL**).

In Millfield Enterprises **Mrs Jane Zohoungbogbo (MELHC Manager)** is the **Designated Safeguarding Lead (DSL)**. **Mr Tom Darke (Business Development Manager)** and **Ms Kate Smook (Director of Studies)** are the **Deputy Designated Safeguarding Leads (DDSLs)**.

### Contact details for the Designated Safeguarding Leads and Deputies:

#### Prep School

1. Michael Jory - Head of Pre Prep (DSL)  
[jory.m@millfieldschool.com](mailto:jory.m@millfieldschool.com)  
Tel: 01458 837752
2. Ben Hilton - Deputy Head (Pastoral) (DDSL)  
[hilton.b@millfieldschool.com](mailto:hilton.b@millfieldschool.com)  
m Tel: 01458 837510
3. David Guthrie – Head of Year 7 (DDSL)  
[guthrie.d@millfieldprep.com](mailto:guthrie.d@millfieldprep.com)  
Tel: 01458 837515
4. Amy Denbee – (DDSL EYFS)  
[denbee.a@millfieldschool.com](mailto:denbee.a@millfieldschool.com)  
Tel: 01458 837760

#### Senior School

1. Adi Whatling - Assistant Head (Student Welfare and DSL)  
[Whatling.a@millfieldschool.com](mailto:Whatling.a@millfieldschool.com)  
Tel: 01458 444622  
Mobile: 07771 944536
2. Fiona Ellison - (DDSL)  
[ellison.f@millfieldschool.com](mailto:ellison.f@millfieldschool.com)  
Tel: 01458 444244
3. Craig Middleton - Assistant Head (Pastoral and Staff) (DDSL)  
[middleton.c@millfieldschool.com](mailto:middleton.c@millfieldschool.com)

Tel: 01458 444378  
Mobile: 07568 106285

4. Claire Trainor- (DDSL)  
[Trainor.c@millfieldschool.com](mailto:Trainor.c@millfieldschool.com)  
Tel: 01458 444228  
Mobile: 07885 964149
5. Kait Weston – Deputy Head (Pastoral) (DDSL)  
[Weston.k@millfieldschool.com](mailto:Weston.k@millfieldschool.com)  
Tel: 01458 444295  
Mobile: 07803 660841
6. Toby Sawrey-Cookson – Director of Year 9 (DDSL)  
[Sawreycookson.t@millfieldschool.com](mailto:Sawreycookson.t@millfieldschool.com)  
Mobile: 07843355312

### **Millfield Enterprises**

1. Jane Zohoungbogbo - MELHC Manager (DSL)  
[zohoungbogbo.j@millfieldschool.com](mailto:zohoungbogbo.j@millfieldschool.com)  
Tel: 01458 444544
2. Tom Darke – Business Development Manager (DDSL)  
[Darke.t@millfieldschool.com](mailto:Darke.t@millfieldschool.com)  
Tel: 01458 444319
3. Ms. Kate Smook – Director of Studies (DDSL)  
[smook.k@millfieldschool.com](mailto:smook.k@millfieldschool.com)  
Tel: 01458 444518

### **The responsibilities of the DSLs and DDSLs include:**

The full responsibilities of the DSL and DDSL are outline in Annex C of [KCSIE \(September 2022\)](#) and include:

- To take lead responsibility for all safeguarding and child protection matters arising at the School, including online and to act as a source of support, advice and expertise to all other staff in dealing with any child protection concerns that arise.
- Act as a point of contact with the safeguarding partners.
- To have the status and authority within the School to carry out the duties of the post including committing resources, and where appropriate, supporting and directing staff to safeguard and promote the welfare of children
- Promoting and safeguarding the welfare of children and young persons for who you are responsible and with whom you come into contact.
- Promoting and safeguarding the mental health of children and young persons for who you are responsible and with whom you come into contact.
- To set policy and procedures and ensure they are being complied without throughout the school.
- Liaise with the Headteachers to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance [PACE Code C 2019](#).

## **Awareness, Training and Support**

Any member of staff can refer to the LADO or Children's Social Care (Somerset Direct); however it is the expectation that the DSLs at both schools are the primary communicators. They will contact the LADO and local safeguarding partner arrangements within 24 hours of a disclosure or suspicion of abuse. If concerns about the suspected misconduct of staff are made to the Heads, the Heads may delegate responsibility to liaise with the LADOs to the DSLs. Together they hold the following responsibilities:

### **Raising Awareness:**

- to monitor and review annually, liaising with the Governing Body, the effectiveness of the Safeguarding Policy and Child Protection Procedures to ensure that they comply with current best practice
- to ensure parents have access to the Safeguarding Policy and Child Protection Procedures which alerts them to the fact that referrals may be made and explain the role of Millfield Schools in this to avoid later conflict. Available on the School website and a hard copy is provided on request or from reception
- to ensure, where necessary, records are passed on to the receiving school if a student transfers.
- to have good links and working relationship with the local safeguarding partner arrangements and LADO/Police (if a criminal matter) so that staff are aware of local policies and training opportunities and keep staff aware of child protection procedures.

### **Training and Support:**

All staff and members of the Governing Body will receive the Somerset Basic Awareness Cascade Training every two years as well as any new legislative updates as required.

To ensure that:

- all staff, must understand the role of the DSL
- all staff, including Governors and Directors of Millfield School Enterprises Limited, receive and read the most recent version of Part 1 KCSIE and Annex B or Annex A as appropriate (and, for Governors and Directors of Millfield School Enterprises Limited, additionally Part 2 and Annex C) and appropriate confirmation of this is recorded and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in either Part One and Annex B or Annex A (as appropriate)
- all staff, including Governors, receive the Child Protection Code of Conduct
- the DSLs receive WRAP Training and coordinate the school's implementation of the Prevent Duty, including protocols for visiting speakers
- the DSL and DDSLs undertake local safeguarding partner arrangements training (Levels I and II) and undertake regular updates once every **two** years as a minimum to include inter-agency working plus any additional training to remain compliant with new guidance and legislation
- manage and deliver Child Protection training for the Heads and all staff who work with children, and keep records of this training. Any new legislation or updates will be communicated to staff on a regular (at least annual) basis either electronically or through Inset (or both).
- all new staff, including Governors, temporary staff and volunteers, must be provided with induction training. The induction training will cover the following areas and staff must have read the following policies:
  - the school's Safeguarding and Child Protection Policy

- the Millfield Code of Conduct, Behaviour Policy including the Whistleblowing Procedure, and Low-Level Concerns Policy & Procedures
- the identity and role of the Designated Safeguarding Lead and any Deputy Designated Safeguarding Lead
- a copy of Part One KCSIE and Annex B or Annex A (as appropriate)
- the school's policy for Children Missing in Education
- Prevent awareness training
- Safe & Acceptable Use IT Policy
- Social Media Policy
- EYFS Mobile Phone and Camera Use
- Mobile Technology in School
- Online Safety Training

## Referrals

- to communicate immediately with **the local safeguarding partners arrangements whenever an allegation or disclosure is made (current or historical)**. We do not have any threshold for referrals. We always direct all allegations to Children's Social Care
- to have sound knowledge of the different forms of abuse and a clear understanding of the possible physical and behavioural indicators and know when it is appropriate to make a referral to Children's Social Care (Somerset Direct 0300 123 2224)
- to ensure all staff are prepared to identify children who may benefit from [Early Help](#). Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
- to ensure that in all cases of actual or alleged harm to a student, the Local Authority Safeguarding Procedures are followed. This will involve contacting the LADO, should the allegation be against a member of staff, otherwise referring to Children's Social Care. The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in a school. Somerset's LADO can be contacted via Children's Social Care on 0300 123 2224. There are online procedures which are regularly updated. (The website is accessible to all staff via Millfield Schools Intranet site - <https://www.proceduresonline.com/swcpp/>). There is also an online tool [Report child abuse to local council](#) which directs to the relevant local children's social care contact number.
- to inform the Heads of all cases of actual or suspected abuse. The only exception to this would be if the Heads were implicated in the concerns, in which case, the Head would not be informed and the matter would be referred directly to the Chair of Governors.
- to act as a focal point for liaison with Children's Social Care and other authorised agencies, ensuring that full and prompt sharing of information is provided at the time of referral and that the referral is confirmed in writing under confidential cover
- to act as a source of support, advice and expertise within School on matters of Child Protection and welfare
- ensure that clear, detailed written records of welfare concerns about students are kept secure and in a locked location
- the school will not investigate allegations of abuse but instead refer to LADO.  
refer cases where a crime may have been committed to the Police as required. [When to call the police \(NPCC\)](#)
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
- **Concerns regarding the EYFS care of the Under 3's should be addressed to OFSTED ref:** Pre-School@MPS  
OFSTED registration number EY 395459

Contact Number OFSTED: 0300 1231231, or [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)

This needs to be carried out in order to inform OFSTED of any allegations of serious harm or abuse of any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises and of the action taken in respect of these allegations. The school will endeavour to report any allegations or concern as immediately as possible but definitely within 14 days.

For those children who have need of additional support or input from outside agencies the school will work with local processes and procedures.

Child Protection files will be transferred to the new school or college as soon as possible and within five days by the safeguarding team. They will be transferred separately to the main file, ensuring security and a confirmed receipt.

## **Confidential Reporting ('Whistleblowing')**

All staff should be aware of their duty to raise concerns, where they exist, about the management of Child Protection, which may include the attitude or actions of colleagues. If the member of staff reporting suspicions remains unsatisfied by a decision not to act by the Heads and the DSL, he or she may, as a responsible citizen, enact the School Whistleblowing Policy and report concerns directly to Children's Social Care. He or she will be considered to have acted as a responsible citizen and will not be held accountable for undermining a school decision.

**The phone number for referral – Children's Social Care (Somerset Direct) – is 0300 123 2224**

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them; see Whistle Blowing Policy.

The NSPCC whistleblowing helpline is available to staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nsppc.org.uk](mailto:help@nsppc.org.uk)

See link: [here](#)

## **Child protection procedures and guidance**

### **What is Child Protection?**

Child Protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm.

### **What is significant harm?**

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and

require discussion with the statutory agencies.

### **Scope and Purpose of these Procedures**

These procedures apply to the Governors and Directors of Millfield School Enterprises Limited, Heads, all staff (including supply and peripatetic staff) and volunteers working for and on behalf of Millfield Schools and explain what action should be taken if there are concerns that a child is or might be suffering harm. A child is a person under 18 years but the principles of these procedures apply also to vulnerable young adults over 18 years.

As well as this policy, the school has extensive arrangements to fulfil other safeguarding and welfare policies including early help strategies within the pastoral system.

The procedures are available to parents on request or via the [School website](#).

### **What constitutes child abuse?**

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. [What to do if you're worried a child is being abused](#). The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for. 'What school and college staff should look for' can be found in Paragraph 20 of [Keeping Children Safe in Education](#).

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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. The sexual abuse of children by other children is a specific safeguarding issue in education.

**Domestic abuse:** All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse regardless of sexual identity, age, ethnicity, socio-economic status, sexuality, or background. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

**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.

**Female Genital Mutilation (FGM):** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Indicators: There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found in Annex B: Further information, of [Keeping Children Safe in Education](#)

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). Whilst all staff should speak to the DSL (or DDSL) with regard to any concerns about female genital mutilation, there is a specific legal duty for on teachers. Teachers have a duty to make personally a report to the police (in addition to liaising with the DSL) where, in the course of their professional duties, they either:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth (see section 2.1a for further information).

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

The duty does not apply in relation to at risk or suspected cases or in cases where the woman is over 18. In these cases, you should follow local safeguarding procedures.

To make a report it is recommended that the person does it orally by calling 101, the non-emergency

number. However, where there is a risk to life or likelihood of serious immediate harm, then it should be reported immediately to police, including dialling 999 if appropriate. In most cases report under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day. For further information please visit the mandatory [FGM report guidance](#).

If a member of staff cannot confirm or has suspicions that FGM has been carried out on a girl under the age of 18 years then they should follow the safeguarding policy. If FGM is believed to have been carried out on a girl under 18 years old then it will be reported to the Police by the DSL or by any member of staff.

**Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):** Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. If a potential victim of modern slavery is identified, a referral will be made under the National Referral Mechanism by the DSL.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

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

### **Child criminal exploitation: county lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, student referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

We know that different forms of harm often overlap, and that perpetrators may subject children and

young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

See Annex B of [Keeping Children Safe in Education \(Sept 2022\)](#)

[Safeguarding Children and Young People from Sexual Exploitation \(2009\)](#)

[What to do if you suspect a child is being sexually exploited \(2012\)](#)

[Child sexual exploitation](#)

**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, for example, 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.

Serious bullying may be regarded as emotional, sexual or physical abuse and will be considered under Child Protection Procedures.

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

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children.

[Preventing and Tackling Bullying](#)

[Mental Health and Behaviour in Schools](#)

[Promoting children and young people's emotional health and wellbeing](#)

[Rise Above](#)

### **Further information on Preventing Radicalisation**

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

As part of the Counter Terrorism and security act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty' Radicalisation and violent extremism could cause harm or have the potential to cause harm to the child and others. Under the Prevent Duty (2015) the school will report in line with the recommended policies and procedures to the local safeguarding partner arrangements / the local Police force (Tel: 101) / Prevent Channel duty offices as appropriate. The DfE dedicated telephone number for non-emergency advice for staff and governors is 0207 3407264 and the mailbox is: [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk).

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the DSL. Staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or DDSL) making a Prevent referral.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the School's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

#### **Indications or Signs of Possible Abuse, including radicalisation:**

- Signs of looking unwashed, undernourished, weight loss etc; inappropriate clothing for the conditions
- Changes in behaviour – depression or withdrawn behaviour or attention seeking behaviour
- Fearful behaviour - fear of specific people places, fear of separation etc.
- Mentioning being left alone or unsupervised
- Regressive or aggressive behaviour e.g. bed-wetting or severe temper outbursts that are out of character
- Mood swings
- Changes of friendship group
- Persistent or multiple bruising in unexpected places, that cannot be explained by normal childhood activity
- Minor injuries in unlikely places
- Burns, scalds or bites

- Delay in seeking access to medical care/treatment
- Excessive preoccupation with sexual matters
- Knowledge of sexual matters inappropriate for age of child
- Promiscuous behaviour
- Sexually explicit or otherwise disturbing creative writing or artwork
- Expression of opinions that are at odds with our shared values, and which may be tantamount to, or explicitly inciting violence and/or illegal acts

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

The above list is by no means exhaustive, and it is important to be aware that there may be other circumstances, not amounting to abuse, which give cause for serious concern about the welfare of students. Questions of the young person being in moral danger, being uncared for, engaging in antisocial or inappropriate behaviour and so on may be referred to the DSL, who will discuss the matter with the Deputy DSL and the Heads, and through them, as necessary, to Children's Social Care. Such cases may also be referred to the Medical Centre and through them to Children's Social Care. Staff are well advised to look beyond the setting - what is happening in other areas of the child's life? Further detailed information on Radicalisation, 'honour based' abuse, and CSE can be found in Annex B: Further information, of [Keeping Children Safe in Education](#).

### **Child-on-Child Abuse**

All staff are committed to the prevention, early identification and appropriate management of child-on-child abuse both within and beyond the school. Staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse.

For these purposes, child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate).

Children are capable of abusing their peers and this is most likely to include, but may not be limited to,

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third

party

- consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>11</sup> (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

There is no clear boundary between incidents that should be regarded as abusive and incidents that should be dealt with by the School's behavioural and disciplinary systems. If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: unkindness, physical fighting and harassment between children are not always or inevitably seen as child protection issues. However, it may be appropriate to regard child-on-child behaviour as abusive if harm is caused because:

There is a significant **power imbalance** between the young people concerned. The abuse of children is often constructed around an age differential between the abuser and the abused, but in cases of child-on-child abuse this may not always be the case. In such circumstances, power imbalances can manifest in other ways, for example gender, social status within peer groups, intellectual ability, physical development, economic wealth, social marginalisation and so on. It is important to note that the alleged abuser and/or receiver of harm may well be subject to power imbalances with other individuals in an incident of abuse and so it is important to investigate any incident as fully as possible.

The alleged abuser has **repeatedly** tried to harm one or more other children.

There are concerns about the **intention** of the alleged abuser. If evidence suggests that there was an intention to cause severe harm to the receiver, this should be regarded as abusive whether severe harm was caused or not.

Issues surrounding Honour Based Violence (HBV), Forced Marriage and Radicalisation may also be relevant where coercion or power imbalances are involved between peers. It is also important to recognise that child-on-child abuse may well involve students here at the School and young persons and children in other contexts, thus making a full range of abuse types possible. When dealing with any disclosure of abuse it is important to remember the three bullet points above regarding power, frequency and intention. The extent to which any victim has given consent is also important.

Staff should be clear as to the school policy and procedure with regards to child-on-child abuse: Notes should be made of all conversations and meetings to do with any incident of child-on-child abuse. Formal written records should be completed immediately or within 24 hours. Records should include date, time, place, persons involved, nature of disclosure and any relevant details. These should be emailed to DSL or entered on to MyConcern immediately.

The DSL, Head and Pastoral teams will offer ongoing support in the best interests of the students in our care and action may need to be co-ordinated where there is a wider investigation involving Children's Social Care and/or the Police. Staff should also refer to the following school policies:

- Anti-Bullying Policy (MPS)
- Anti-Bullying Policy (Senior)
- Anti-Cyberbullying Policy

Allegations of child-on-child abuse will be investigated in line with other school policies and additional pastoral support will be put in place when required. Child-on-child abuse should never be tolerated and is not “banter” or “part of growing up”.

Advice would be taken from

[Part 5 Keeping Children Safe in Education \(Sept 2022\)](#)

[Sexual Harassment and Sexual Violence Advice](#)

[Anti-Bullying Alliance](#)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

[Searching, Screening and Confiscation](#)

[Teaching online safety in School \(DfE June 2019\)](#)

It is more likely that girls will be victims and boys’ perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously. Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not reported.

### **Considering confidentiality and anonymity**

When considering confidentiality and anonymity in relation to reports of sexual violence and sexual harassment, staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

Where the victim does not give consent for their information to be shared, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies, in such instances advice should be sought from the DSL (or DDSL).

Should the DSL (or DDSL) feel it necessary to go ahead and make a referral to the local authority children’s social care and/or a report to the police against the victim’s wishes, this will be handled with extreme care, with the reasons being explained to the victim and the appropriate specialist support being offered. Further information on confidentiality and information sharing is available at [Safeguarding Practitioners Information Sharing Advice](#) .

The School will do all it reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. This will include careful consideration as to which staff should know about the report and any support that will be put in place for the children involved. Consideration will be taken regarding the potential impact of social media in facilitating the spreading of rumours and exposing victims identities.

### **Statement on confidentiality**

The management of confidentiality is an essential factor in all issues relating to Child Protection. The only purpose of confidentiality with respect to Child Protection is to benefit the child.

Staff should never give students or adults an absolute guarantee of confidentiality but must ensure that the information is disclosed only to the people who need to know.

It should be explained to children and young people that secrets cannot and should not be kept if keeping them means that they, or others, will continue to be harmed.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998 European Convention on Human Rights, Article 8). Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances, obtaining consent may not be possible or be in the best interests of the child, for example, where safety and welfare of that child necessitates that the information should be shared. The law permits the disclosure of confidential information necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case, and legal advice should be sought if in doubt.

## **Risk Assessments**

When a report of sexual violence is made, the DSL (or DDSL) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, a risk assessment will be considered on a case-by-case basis.

Risk assessments will be recorded and kept under review. The School will at all times actively consider the risks posed to all students at the school, and implement adequate measures to protect and keep them safe.

The DSL (or DDSL) will ensure ongoing engagement with the local authority children's social care and specialist services as deemed necessary. Any professional assessments will be used to inform the school approach to supporting and protecting the students and updating our own risk assessments.

All staff working at the School are advised to maintain an attitude of 'it could happen here' and act in the best interests of the child. The School will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment, both online and offline, including those that have happened outside of school. Considerations will include;

- The wishes of the victim in terms of how they wish to proceed.
- The nature of the alleged incident
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children
- Whether the alleged incident is a one-off or a sustained pattern of abuse
- That sexual violence and sexual harassment can take place within intimate personal relationships between children
- Importance of understanding intra familial harms and any necessary support for siblings following the alleged incident
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The School will give immediate consideration so to how best support and protect both the victim and the alleged perpetrator(s) and any other children that may be involved/impacted.

## Serious Violence

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

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

## Children with Special Educational Needs

Children with Special Educational Needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Staff need to be aware that additional barriers that these children face such as:

- communication barriers and difficulties in managing or reporting these challenges
- disproportionately impacted by behaviours such as bullying, without outwardly displaying symptoms or signs
- assumptions that indicators of possible abuse such as behaviour, mood, injury relate to the child's disability without further explanation
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so (cognitive understanding).

There's a concern sometimes that, for children with SEN and disabilities, that their SEN or disability needs are seen first, and the potential for abuse second. The EHA (Early Help Assessment) Tool should be used where the root causes of abuse may be underlying and beyond SEN issues and behaviour.

The school will consider extra pastoral support and attention for these students, along with ensuring appropriate support for communication is in place.

### **Procedures to minimise the risk of child-on-child abuse:**

- Robust PSHEE and RSE curriculum;
- Promotion of student voice through Year Group/Houses/Full School Councils;
- Promotion of school-based security measures:
- Staff rotas for management of toilets, changing rooms
- Staff supervision etc.

### **Systems in place for children to report abuse:**

- Disclosure to a member of staff
- Report via anonymous reporting Student Voice
- Disclosure to senior student e.g., prefect, Head of House who has undertaken leadership training.

## **Looked after children**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. When it becomes necessary, we shall follow statutory guidelines and ensure all staff are appropriately trained.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although the School has a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the School. However it should be clear to the School who has parental responsibility.

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close relative is defined as a 'grandparent, brother, sister, uncle, or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak with family of the child involved to check they are aware of their duty to inform the local authority.

## **Children who go missing**

The Missing Child Policy and Missing Boarders Procedure ensure that all measures are taken to monitor attendance and provide guidance to all staff when a student is missing from lessons or house. In addition, Millfield is cognisant of the 'Statutory guidance on children who run away and go missing from home or care' - January 2014 and Working Together to Safeguard Children 2018 and all matters of this type are referred to the DSL, who will liaise with the appropriate Deputy Head and Head in each case.

Millfield will hold more than one emergency contact for each child with two being the expected level of contact including phones and emails where possible.

## **Children missing from education**

A child going missing from education is a potential indicator of abuse or neglect including sexual abuse or exploitation, child criminal exploitation or mental health problems. The appropriate safeguarding procedures will be used for children who go missing from school, particularly on repeat occasions. Staff are aware of potential triggers such as travelling to conflict zones, FGM, forced marriages etc.

If a child is failing to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days, then the local authority will be notified of the absence. The local authority will be notified when a student is deleted from the admission register / school register. This will be acted upon as soon as the grounds for deletion are met, but no later than deleting the student's name.

We will always follow up with parents/guardians when students are not at school. The school should be informed of at least two emergency contact telephone numbers, which should be updated as soon as possible if the numbers change.

### **Safeguarding concerns for children who move school or 'disappear'**

If we become aware that a UK based child is missing from education, in whatever capacity, and we need to check their educational status, we should make enquiries with the Children Missing Education Liaison Officer based at County Hall in Taunton.

If a non UK national is missing from education and they have a Child Protection plan in place we will endeavour to pass on the information to the appropriate authorities, probably through the child's Guardian.

In addition, the UK Visa and Immigration service will be informed in line with HTS (Highly Trusted Status) procedures where appropriate.

See the link below for further guidance:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children\\_Missing\\_Education\\_-\\_statutory\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

As a school we need to be aware of local environmental issues which may arise such as county lines, gang culture and we will be alert to this through ongoing training and liaising with Somerset Safeguarding Partnership (SSP).

### **Children potentially at greater risk of harm**

Where children need a social worker, we recognise that this is an indicator that a child is more at risk than most students. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these

needs into account decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting and supporting their welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Whilst a child who may be LGBT may not itself be an inherent risk factor for harm, these children can be targeted by other children. In some cases, a child who is perceived as LGBT (whether or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack trusted adults with who they can be open. The School endeavour to reduce additional barriers faced by providing a safe space for them to speak or being able to identify a relevant member of staff.

### **Close 1:1 Teaching**

For example in 1:1 teaching in Performing Arts or Specialist Sports Coaching refer to Code of Conduct for Staff for advice on policy and procedures.

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim; and by strangers. Community safety incidents (for example, people loitering nearby or unknown adults engaging children in conversation) can raise concerns amongst students and their parents. Pupils receive age-appropriate lessons on how to keep themselves safe which focus on building their confidence and abilities rather than simply warning them about all strangers.

### **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing the school's computer network without permission;
- denial of Service attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software including viruses, spyware, ransomware, botnets and Remote Access Trojans) with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider referring the pupil into the Cyber Choices programme, a nationwide police programme which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

## Procedures following any form of disclosure

Receive	Respond	Reassure	Record	Report
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### Receive:

- **Listen** sympathetically and with an open mind
- Stay calm, conveying this through word and action
- **Do not** look at any potentially concerning electronic images. Pass all devices on to the DSL.
- **Never promise confidentiality, only discretion. It is important that the student understands from the outset that if they choose to disclose information that indicates actual or potential harm to themselves or others, then certain actions will need to be taken. If necessary, pause a child before he/she has begun what you anticipate might be a disclosure and remind them**
- Allow the child to talk and finish their story. Let them tell you what they want and no more
- Do not ask any leading questions

### Respond:

- Where necessary clarify what has been said
- Ensure that you have a full understanding of the facts as related by the student, perhaps by reporting back to the student for his/her confirmation
- Never ask leading questions
- When the student has finished make sure they feel secure. Explain what you will do next and (where appropriate) the referral process
- **Action must be taken immediately if the student is in imminent danger**

### Reassure:

- Acknowledge their courage in talking to you and reassure them that what they have said will be taken seriously
- Remind them that the abuse is not their fault
- Reassure them but do not promise what you may not be able to deliver – ‘Everything will be alright now’ – it may not be.

### Record:

- Record as much as you can remember as soon as possible (preferably immediately) afterwards, using the student’s own words as far as possible. Include who was present and the date, time and location of the incident or disclosure
- Log on to MyConcern and fill in ‘REPORT A CONCERN’, or if no access to a PC, please use the QR code on the safeguard team poster (please see Appendix III).

### Report:

- Refer the matter within 24 hours or sooner and **immediately if any student is in danger** to the DSL. Do not discuss with parents/carers. The DSL will agree with the Social Care team when parents/carers should be contacted and by whom. If the DSL is not available, staff should go via the DDSL, or SLT/SMT, or taken advice from the local children’s social care.

You have now fulfilled your duty and you should **not take any further action** or reveal this information to anyone else. The DSL will be aware that you may need support following a disclosure.

## Action to be taken by the Designated Safeguarding Lead / Deputy Designated Safeguarding Lead in case of an allegation of abuse and/or concerns raised

- Following the receipt of a report, the DSL and Heads will seek advice from the LADO/Children's Social Care (depending on who the allegation is made against)
- This may be done without giving names at first, and then follow the advice given. Millfield Schools will not investigate allegations of abuse, but will instead always refer to the appropriate authority. In cases of serious harm, the Police would be informed from the outset
- Agree with Children's Social Care any necessary next steps in relation to:
  - \* informing a student's parents when appropriate
  - \* medical examination or treatment
  - \* immediate protection for the victim or a student who has given information about an abuser or a student against whom an allegation has been made
- Inform the student or adult who made the initial allegation of what the next steps are to be
- Inform the relevant Heads of the allegation and action taken
- Ensure long term protection support for all students involved
- If unhappy with the action of Somerset Safeguarding Partnership (SSP) then use the Escalation Policy of Somerset Safeguarding Partnership (SSP)
- Any advice given will be clearly recorded as a file note.

When there are reports of abuse involving a number of students against a student or other students or any specific safeguarding issues the DSL will meet with appropriate staff following advice from Children's Social Care and coordinate the matters in line with guidance from Somerset Safeguarding Partnership (SSP) and ISI. The DSL will:

- Follow procedure and refer to the Children's Social Care team
- Ensure secure supervised spaces for all involved
- Involve the Deputy DSL and members of SLT/SMT trained to Level 2 as appropriate
- Follow guidance above with respect to each student in a secure supervised environment.
- If a student appears injured and/or distressed in anyway then medical attention may need to be received
- Practical and up to date support and information can also be found on [www.nspcc.org.uk](http://www.nspcc.org.uk) or via the [www.gov.uk](http://www.gov.uk) website

If there is an allegation against a person outside the school community, the DSL will seek advice from external agencies and contact the parents as and when appropriate.

**Millfield Schools will always undertake to share their intention to refer a child to Children's Social Care with their parents/carers unless to do so could put the child at greater risk or harm or impede a criminal investigation.**

### Support for victims/perpetrators/other children affected by abuse e.g. child-on-child abuse

- Counselling
- Referral to specialist support services if needed e.g. rape counselling/ CAMHS etc.
- Support from a trusted adult e.g. HsM
- Safety plan devised by DSL, HsM and child (plus other adults if required)

## Low level concerns

As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

### **What is a low level concern?**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338, of [KCSiE September 2022](#).

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly with the Head or DSL. Concerns can be reported verbally, following which an appropriate written record of the conversation will be made, or by submitting a Low-Level Concern Form (Appendix 2 of the Low-Level Concerns Policy). Reports will be dealt with appropriately, whilst ensuring those working in or on behalf of schools and colleges are protected from potential false allegations or misunderstandings.

If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then this should be referred to the Heads.

## Procedures Following an Allegation of Abuse by a Member of Staff (including volunteers and supply teachers)

It is important to draw a distinction between complaints and allegations against staff. In other words, the difference between behaviours that suggest misconduct or unprofessionalism, and those which specifically raise child protection concerns.

An allegation should be made if a teacher or other member of staff has:

- **behaved in a way that has harmed a child, or may have harmed a child;**
- **possibly committed a criminal offence against or related to a child;**
- **behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or**
- **behaved or may have behaved in a way that indicates they may not be suitable to work with children.**

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, schools and colleges should:

- apply common sense and judgement;
- deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

If an allegation is made against a teacher or member of staff, then the quick resolution of that allegation will be a clear priority as this is a benefit to all concerned. Any unnecessary delays should be eradicated. The Head should be informed at the earliest opportunity.

Any concern which involves the possibility of physical, emotional or sexual abuse will always be referred within 24 hours to the Local Authority Designated Officer (LADO) and their advice taken prior to any investigation. If child protection procedures are needed, an investigation will be carried out by Children's Social Care and the Police.

The Designated Safeguarding Lead (and or DDSL), the Heads and Governors must not carry out investigations themselves.

If an allegation is made against a member of staff it must be responded to immediately and with the utmost discretion to ensure protection for the child and support for the person who is the subject of the allegation. The informant should be told that the matter will be referred in confidence to the appropriate people. This must be done and the written record passed on **the same day** to the Designated Safeguarding Lead and the relevant Head. The circumstances should be kept strictly confidential until the relevant Head has been able to judge whether or not an allegation or concern indicates possible abuse. The concerns will be discussed with the Local Authority Designated Officer (LADO) for allegations management <http://sscb.safeguardingsomerset.org.uk/working-with->

If it is decided by the appropriate LADO that an investigation is called for, it is the responsibility of the Children's Social Care manager to arrange a Strategy Meeting. This would normally involve the Police, Children's Social Care, the DSL, the relevant Head and preferably a member of the Governing Body of Millfield Schools. The arrangements agreed upon will include informing the parents and seeking their consent for any immediate medical examination. Where a member of Boarding Staff is suspended pending an investigation of a child protection nature, alternative accommodation (away from children) will be arranged.

If the allegation made to a member of staff concerns a Head, the person receiving the allegation will immediately inform the Chairman of the Board of Governors, without prior notification to the Head. If the allegation concerns the DSL and/or DDSL, then the relevant Head must be informed.

If the allegation is made against a volunteer, a supply teacher, contractor etc, an investigation will necessarily involve the organisation or agency of employment. For those who are self-employed the allegation will be passed directly to Somerset Safeguarding Partnership (SSP) or LADO for advice or action, dependent upon whom the allegation is made against.

The person who is the subject of the allegation will normally be informed as soon as possible after the result of the initial investigation is known, or the decision is made to dispense with one, but not invited to make a response. There should be a warning that anything said will be recorded.

If it is established that the allegation is not well founded, either on the basis of the medical evidence or further statements, then the person against whom the allegation has been made would normally be informed that the matter is closed and any notes will be removed from their personnel file and will not be referred to in any references.

Students that are found to have made malicious allegations are likely to have breached school behaviour policies. The school will then determine what, if any, sanctions are appropriate. Police may well be informed if there are grounds to believe that a criminal offence may have been committed. Also, Children's Social Care may need to be involved with any follow up work with the student.

If the police decide to take the case further, the member of staff implicated would normally be suspended or, where the circumstances are considered to warrant it, dismissed. It is reasonable to ask the police to give some indication of their timescale.

The school will report to the DBS **within one month of leaving** 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, and the school has a duty to consider referral to Teaching Regulation Agency (TRA) this will be in line with the criteria by TRA. Advice about whether an allegation against a teacher is sufficiently serious to refer to TRA can be found at: [Teacher Misconduct The Prohibition of Teachers - October 2015](#) Or the TRA website:

<https://www.gov.uk/government/organisations/teaching-regulation-agency>

**Record Keeping:** All concerns, discussions and the decisions made a clear and the reasons for those decisions, should be recorded in writing. A comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, will be kept on the confidential personnel file and will be retained securely until the member of staff reaches retirement age, or for a period of 10 years after the allegation has been made. The school will provide information regarding an allegation for the purposes of future references and DBS disclosures.

The school is aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance '[For Organisations](#)' which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information.

The data Protection Act 2018 and the UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

#### **Good Practice Recommendations for Record Keeping will involve;**

- Ensuring that a proper record is kept of any Child Protection referral and action taken, and that this is kept securely and in confidence
- Child Protection records should be kept for the approved timescale for the various Authorities we are in conjunction with and then shredded on the basis that this information has been shared with Children's Social Care who will continue to hold copies
- When notes are dispatched to another school ensure that the original copies are held and that photocopies are despatched with notes and records of delivery i.e. special delivery / recorded delivery
- Ensuring that Child Protection files are monitored every term.
- New children have their old school approached to transfer any child protection files securely and also a proactive approach to ensuring sufficient support and cascading of information in place for key staff.

#### **Policy on allegations involving sexual impropriety**

If a member of staff is informed by a student of an event involving sexual impropriety of any kind, whether between students or staff and students, the following steps should be taken:

- Listen sympathetically and afterwards briefly note the content of what was disclosed, sign and date it
- Contact the Designated Safeguarding Lead immediately, who will discuss with the relevant Head and the LADO whether Children's Social Care should be notified
- If Children's Social Care is notified and it is agreed that Millfield Schools alone should follow up the issue, the DSL will interview the complainant and report as quickly as possible to the relevant Head who will oversee the disciplinary aspects of the enquiry
- If Children's Social Care seeks further investigations, they will open an enquiry. In these circumstances, Millfield Schools' internal disciplinary procedures will be suspended until cleared by Children's Social Care.

**This policy should be implemented regardless of whether the complainant is over or under 16. Parents should be informed as soon as a referral to Children's Social Care has been made by the Child Protection Liaison Person, unless to do so would put the student at greater risk of harm.**

## Policy on safeguarding and ICT

### SAFEGUARDING AND ICT GUIDELINES

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
  - **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
  - **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Protecting young people in the online world means thinking beyond the school environment. With the advance of Internet technology, students increasingly will have access to personal devices not covered by School network protection and therefore the emphasis should be on educating all users as to the risks involved and their obligation to act responsibly whilst online, however the School regularly review the effectiveness of our monitoring and filtering arrangements.

Safeguarding students in both the real and virtual world is the responsibility of all staff. Staff and the governing body must be familiar with these guidelines and understand how to respond to online incidents even when online at home. Staff need to be vigilant for threats of radicalisation online as well as cyber bullying or any other safety issues. Students will be taught through the curriculum including PSHEE and other pastoral support systems how to behave and build resilience in dealing with such matters.

All students should be made aware of the Millfield Student Safe & Acceptable ICT Use Policy and what to do if they have any ICT safeguarding concerns. Other school policies relating to Mobile devices and Social media also needs to be consulted. The Network Manager, the online Coordinator and other key personnel may also be consulted with.

### PROCEDURES FOR DEALING WITH INAPPROPRIATE/ILLEGAL INTERNET ACCESS OR MATERIAL

Millfield Schools have installed robust web filtering software to ensure the protection of its students whilst accessing the Internet. It is recognised that no software is infallible, and the following procedures will be abided by where necessary.

Discovery of inappropriate websites, by staff or students, should be reported immediately to the Designated Safeguarding Lead, who in liaison with the Network Manager will consider referral to <https://ceop.police.uk/> and the Police.

Illegal material within the School's network is a very serious situation and must always be reported to the Police. Any incident that involves inappropriate adult access to legal material on Millfield Schools' premises will be dealt with by the School's disciplinary policy in conjunction with the Police.

**Action in the event of discovery of illegal material:**

- seek immediate and specific advice from the Designated Safeguarding Lead who will consult with the Network Manager, the relevant Head and the Police
- prevent any further access to the device/network location until the correct advice is gained
- **unless absolutely necessary, DO NOT remove the power from a working device and under no circumstances start a device if it is already switched off**
- Consider if it is necessary to prevent remote access to the device/network location
- If it is believed that a member of staff or student who has left the site, could remove or damage evidence on the device remotely, unplug ONLY the network cable from the back of the device to prevent this access from occurring
- If the device is already turned off and it is no longer realistically possible to prevent further physical access (i.e. due to lack of supervision, high levels of access or an unoccupied location) disconnect the power at the base unit (not the wall) and remove the laptop. Store this device securely in a location where no one else can gain access to it and make a note of the date, time and name of the individual who performed this action.

**Under no circumstances should any member of staff attempt to conduct an investigation of their own or bring in an outside expert to do so as this may compromise the evidence if a legal case were to result. In some cases, this may constitute a criminal offence in itself.**

Further information regarding Safeguarding and ICT can be found in Part 1 and Annex B of [Keeping Children Safe in Education \(Sept 2022\)](#)

**Guidance on nudes and semi-nudes**

Details of how to respond to incidents of nudes and semi-nudes can be found at the following link:

[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

**Work Experience/Host families**

Special Circumstances

[Keeping Children Safe in Education- See Annex D](#)

This needs to be run in conjunction with the Schools Policies and procedures for work experience, volunteers policy and overseas trips and tours

- Work Experience Procedure
- Volunteers Policy
- Overseas Trips and Tours Policy

**Policy on keeping staff safe**

**Good Practice and Guidance on the Prevention of Allegations of Abuse - 'Safe School, Safe Staff'**

Millfield Schools are committed to ensuring that relationships between staff and students are conducted on a professional basis. Anticipation of possible risks and seeking to prevent all reasonable

risk of misunderstandings and false allegations are seen as part of this commitment.

Good practice includes valuing and respecting children as individuals and the adult modelling of appropriate conduct – please refer to the Code of Conduct for Staff. **It is recognised that it is the action rather than the intention that may subsequently give rise to problems.**

Early Years Foundation Stage (EYFS) only: EYFS and Pre Prep staff are not allowed to use personal devices such as phones, cameras or recording equipment to capture or record the students. They are not to be taken into classrooms and must only be used in designated staff areas. This is done with the sole intention of protecting our children from harm. Please see EYFS Mobile Phone Policy.

It is always recommended as good practice that all staff, where possible, only use Millfield owned devices to take photographs or record children (Refer to AUP).

**It is important for all staff and others in contact with children to:**

- be mindful of safe working practices and alert to situations which may present risks and manage these
- ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged
- empower children – discuss with them their rights and responsibilities, what is acceptable and unacceptable, and what they can do if there is a problem.

**Staff and others must never:**

- hit or otherwise physically assault children
- develop relationships with children which could in any way be deemed exploitative or abusive
- use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- behave physically in a manner which is inappropriate or sexually provocative
- condone, or participate in, behaviour of children which is illegal, unsafe or abusive
- act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse
- discriminate against, show differential treatment, or favour particular children to the exclusion of others
- never touch a child in a way which may be considered indecent – e.g. never touch a student below the shoulder unless there is a justifiable reason
- do anything of a personal nature for a student that he/she can do for him/herself
- indulge in horseplay, tickling or other games involving physical contact.

**Staff and residential staff should:**

- avoid inviting students (groups or individuals) to their homes unless there is a good reason and it has been approved by Senior Management. This prohibition also applies where staff have onsite accommodation, outside of the boarding house environment
- not give students their home address, home telephone number, mobile telephone number, or personal email address
- not give a student a lift in their own vehicle other than on school business and with permission from SLT/SMT.

This is not an exhaustive list. The principle is that staff should avoid actions or behaviour which may constitute poor practice or potentially abusive behaviour or be open to misinterpretation.

**If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded in writing as soon as possible and given to the DSL with a copy placed on the child's file.**

## **Responding to the needs of children requiring extra help to protect and promote their welfare**

Staff vigilance may identify children who may not reach external agencies' thresholds for intervention but still need our help to protect and promote their welfare in and out of school. Information can be found at the following link: [Effective Support for Children & Families in Somerset](#).

These children will be high priority in our pastoral system and should be well known to key pastoral staff and prioritised within the school. When dealing with these children the key points are:

- Listen and give the children time and space to talk safely
- Remember that no child under the age of 13 years can give informed consent to sexual activity. It is important to operate within Somerset Safeguarding Partnership (SSP) guidance on this issue and the legal age of consent is 16 years old.
- Record actual comments and concerns raised without putting words into their mouths
- Recognising that the child is free to speak to whomever they feel comfortable with, not just dedicated counsellors and pastoral staff
- Remember - never promise confidentiality
- Engage parents where appropriate and talk openly but do not avoid talking to Children's Social services if there are concerns about the welfare of the child at home. Never share concerns with parents if you are at risk of causing further damage to the child. In these matters take advice from DSL or Children's Social care team.
- Take advice from external agencies and cooperate fully with them
- Understand the differences between "actual" harm and "likely" harm and what needs to be done
- Teaching online safety in School (June 2019)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education Statutory guidance for governing bodies, proprietors, head teachers, principals, senior leadership teams, teachers (February 2019)

## **Related Documentation**

- Keeping Children Safe in Education- September 2022
- Statutory framework for the early years foundation stage – September 2021
- Teaching Online Safety in School -June 2019
- Working Together to Safeguard Children -September 2018
- Disqualification under the Childcare Act 2006 - September 2018
- Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers - July 2018
- Promoting the education of looked after children and previously looked after children Statutory guidance for local authorities- February 2018
- Prevent and Tackling Bullying – July 2017
- Children Missing Education – September 2016

- The Use of Social Media for online radicalisation -July 2015
- Mental Health and Behaviour in schools - March 2018
- Counselling in Schools: A Blueprint for the Future – March 2016
- What to do if you're worried a child is being abused- March 2015
- Teacher misconduct: the prohibition of teachers February 2022
- Mandatory Reporting of Female Genital Mutilation- procedural information – HM Office October 2015
- The Prevent Duty – Departmental advice for schools and childcare providers – June 2015
- Teacher misconduct: information for teachers. A guide for teachers subject to teacher regulation disciplinary procedures –February 2022
- Prevent Duty Guidance for England and Wales – HM Government – March 2015
- “Prevent” Counter-Terrorism and Security Act -(2015)
- ‘Statutory guidance on children who run away or go missing from home or care’ DfEs (-Jan 2014) DfES
- Dealing with Allegations of Abuse against Teachers and Other Staff (October 2012) DfES- October 2012
- Safeguarding Children and Safer Recruitment in Education (2007, updated 2010) DfES – 2007, updated 2010
- Disqualification under the Childcare Act 2006 (by association) - 2006
- Care Standards Act 2000 and Children Act 1989 and 2004 (Section 17 and 47) South West Child Protection Procedures (SWCPP)  
<http://www.proceduresonline.com/swcpp/somerset/index.html>
- Associated guidance replace Chapter 5 of SCSRE
- Regulated Activity in relation to children: scope
- UK Safer Internet Centre: Appropriate Filtering and Monitoring
- Relationships Education, Relationships and Sex Education (RSE) and Health Education
- When to call the police (NPCC)
- Child sexual exploitation
- [Preventing and tackling bullying](#)
- [Mental Health and Behaviour in Schools](#)
- [Promoting children and young people’s emotional health and wellbeing](#)
- [Rise Above](#)
- [Farrer and Co- Child on Child Abuse Toolkit](#)
- [Lucy Faithful Foundation](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

## Related School Documentation-

For the policies, please see [here](#).

- Whistle Blowing Policy
- Millfield Safer Recruitment and Selection Policy
- Anti-bullying policy
- Equal Opportunity Policy
- ICT Acceptable Usage Policy (AUP)
- Acceptable Usage Policy
- Behaviour and Discipline policy
- Staff Code of Conduct

- EYFS documentation
- Health and Safety Policy
- Missing Children Policy
- Risk Assessments including off site activities
- AEN policy
- EAL policy
- Staff misconduct and discipline policy
- Safe and Acceptable Use of IT Policy
- Social Media Policy
- PSHEE and Relationships Education, Relationships and Sex Education (RSE) Policy.

Further local safeguarding partner arrangements documents can be found on <http://sscb.safeguardingsomerset.org.uk/>

**The Safeguarding Policy and Child Protection Procedures will be reviewed at least annually and in the light of statutory changes and after any child protection concern.**

#### **Useful Contacts:**

- Children’s Social Care (Somerset Direct) 0300 123 2224 – contact LADO via this number
- Police 101 or 999 emergency
- NSPCC Whistleblowing Helpline 0808 028 0285
- Police Prevent Team 01793 507926
- Avon and Somerset Prevent 01278 647466 [prevent@somerset.gov.uk](mailto:prevent@somerset.gov.uk)
- Regional Channel Coordinator 0117 9455539 [channelsw@avonandsomerset.pnn.police.uk](mailto:channelsw@avonandsomerset.pnn.police.uk)
- DfE dedicated helpline and mailbox for non-emergency advice for Governors and staff: 020 7340 7264 [Counterextremism@education.gov.uk](mailto:Counterextremism@education.gov.uk)
- EYFS/Ofsted – 0300 123 1231 [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)
- Childline/NSPCC 0800 11 11
- Disclosure and Barring Services 0300 0200 190 [customeroffices@dbs.gsi.gov.uk](mailto:customeroffices@dbs.gsi.gov.uk)
- UK Council for Internet Safety
- National Education Network (NEN)
- [Operation Encompass](#)- For FREE advice from an Education Psychologist about how best to support them, call the OE Teachers' National Helpline on **0204 513 9990**
- National Domestic Abuse Helpline -24 hours a day on 0808 2000 247
- Report Abuse in Education helpline on 0800 136 663
- Lucy Faithful Foundation- 0808 1000 900

## Appendix I

### KEEPING STAFF SAFE

#### **Communication with Children and Young People at Millfield Schools (*including the Use of Technology*)**

Communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs. Adults should not share any personal information with a child or young person. They should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They should not give their personal contact details to children and young people including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with senior management and parents/carers. E-mail or text communications between an adult and a child young person outside agreed protocols may lead to disciplinary and/or criminal investigations. This includes communications through internet based web sites.

Internal e-mail systems should only be used in accordance with the organisation's policy.

*This means that the organisation should:*

- *have a communication policy which specifies acceptable and permissible modes of communication*

*This means that adults should:*

- *not give their personal contact details to children or young people, including their mobile telephone number and details of any blogs or personal websites*
- *only use equipment e.g. mobile phones, provided by organisation to communicate with children, making sure that parents have given permission for this form of communication to be used*
- *only make contact with children for professional reasons and in accordance with any organisation policy*
- *recognise that text messaging is rarely an appropriate response to a child in a crisis situation or at risk of harm. It should only be used as a last resort when other forms of communication are not possible*
- *not use internet or web-based communication channels to send personal messages to a child/young person*
- *ensure that if a social networking site is used, details are not shared with children and young people and privacy settings are set at maximum.*

Guidance for Safer Working Practice for Adults who Work with Children and Young People- February 2022.

## Appendix II: Safer Recruitment of Staff (NB to be read in conjunction with Millfield Schools' Safer Recruitment and Selection Policy)

Issues relating to child protection and the welfare of students are central to the process of appointing both teaching and support staff.

The appointment process is designed to deter potential offenders from applying; all advertisements should make reference to the Safeguarding Policy. All applicants are required to complete application forms which are scrutinised for discrepancies, anomalies and gaps in employment, and are designed to prompt interviewers to detect lacunae, frequent changes of jobs and movement around the country. They state the primacy of child protection concerns at the school and require a declaration of past convictions and whether or not the candidate is on the barred list and disqualified from working with children.

- References should be sought on all short-listed candidates, and should be obtained prior to interview so that any issues of concern they raise can be explored further with the referee and taken up with the candidate at interview. Where a reference has not been obtained before interview, ensure that it is received and scrutinised, and any concerns are resolved satisfactorily, before the person's appointment is confirmed. References should be completed on a reference pro forma and include sections requiring declarations of concerns raised, whether proven or not, which relate to the safety and welfare of children. References must be from at least two sources or institutions, and should always be sought and obtained directly from the referee. Where a candidate has worked with children in the past, a reference should be sought from that establishment where possible. On receipt, the written reference should be checked to ensure all specific questions have been answered and information provided correctly corresponds with that on the candidate's application form. Alongside references, an online search of the shortlisted candidate should be completed prior to interview and this check should be confirmed by HR on the Pre-Interview proforma.
- When interviewing, there must be a minimum of two members of staff in the interview panel and at least one member must have completed the Safer Recruitment in Education training. The Heads will, where possible, be accompanied by a member of the Senior Leadership Team when interviewing so that proceedings may be recorded. Support staff will be interviewed by a member of the Human Resources team together with the relevant line manager. Senior staff will be interviewed by the Finance Director and the Head of Human Resources. Those interviewing must not be afraid to ask difficult questions of the candidate or referee.
- On the day of interview, identity and qualification checks must be conducted and verified for each candidate by scrutiny of appropriate original documents. A form of photographic identification should be sought, except in exceptional circumstances, combined with evidence of address and any changes in name. Satisfactory explanations for gaps in employment history should also be sought at interview.
- Offers of appointment for all staff should be conditional on satisfactory completion of the following pre-appointment checks and a probationary period; references, identity, qualifications, right to work in the UK, DBS, the barred list, prohibition from Management check (for those appointed to a managerial role), prohibition from teaching check, disqualification declaration for those working or directly concerned in the management of Early Years settings, and medical declaration. Where the appointee has lived outside of the UK in the last 10 years further checks should be obtained i.e. Certificate of Good Conduct and, where possible, a Letter of Professional Standing if the individual qualified in Teaching outside of the UK

Any member of staff found not suitable to work with children will be notified to the Independent Safeguarding Authority (DBS). Any raised concern, whether proven or not, will be reported in staff references.

- In addition to staff files the Head of Human Resources will keep and maintain a single central record of recruitment and vetting checks to ease checking against names if enquiries are made or concerns raised.

Where an employee (teaching or non-teaching) is provided by a third party, identity checks must be conducted, as well as the necessary safeguarding checks completed

- For agency staff or other individuals who may work in the school, HR will obtain written confirmation along with appropriate ID, from the respective supply agencies or third-party organisations, which will confirm that the individual they are supplying has been appropriately checked and are suitable to work with children.

## **Appendix III - Children Act Sections 17 and 47**

### **Section 17**

**17 Provision of services for children in need, their families and others.**

<http://legislation.data.gov.uk/ukpga/1989/41/section/17/data.htm?wrap=true>

### **Section 47**

**47 Local authority's duty to investigate.**

<http://legislation.data.gov.uk/ukpga/1989/41/section/47/data.htm?wrap=true>

**For the Recruitment and Selection Checklists for both Support and Sport Staff and Teaching and Supply Staff please see [Human Resources](#).**

### **Glossary**

SSP is an abbreviation for the Somerset Safeguarding Partnership (SSP) the new name for the Local Safeguarding Board (LSCB).



# SAFEGUARDING TEAM 2022-2023

If you have any suspicions, knowledge of abuse or serious concerns about the welfare of a student, please report immediately to:

## How to report any safeguarding concerns:

- Teaching staff, coaches and support staff with regular access to a PC, should continue to use My Concern
- All individuals without regular access to a PC but with access to a personal smart phone, can use this QR code, or,
- Those who cannot use the QR code, should report immediately to their line manager or come straight to the safeguarding team.



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Policy owner	Designated Safeguarding Leads- Millfield and Millfield MPS, MPPS
Reviewed on	September 2022
Review by date	September 2023
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